



SURBITON

HIGH SCHOOL

Pupil and Parent Privacy notice

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This notice is intended to provide information about how the School will use or “process” personal data about individuals including current, past and prospective pupils and their parents, carers or guardians, and host families (referred to in this notice as “parents”).

1. Responsibility for Data Protection

The data controller for personal information held by Surbiton High School is United Church Schools Trust (UCST). UCST is registered with the Information Commissioner’s Office (ICO). The registration number is **Z533407X**.

The Company Secretary, Steve Whiffen, is responsible for ensuring that UCST complies with the Data Protection Act 2018. He can be contacted on company.secretary@unitedlearning.org.uk or 01832 864538.

Marinke Overwater is responsible for ensuring that the School complies with UCST’s policies and procedures in relation to Data Protection. She can be contacted on data.protection@surbitonhigh.com

2. The purposes for which we process pupil and parent personal data

Surbiton High School and UCST collect, create and hold personal information relating to our pupils and may also receive information about them from their previous school, local authority and/or the Department for Education (DfE). We also collect and hold personal information about our pupils, parents and carers. We use this personal data to:

- Provide education services (including SEN), career services and extra-curricular activities to pupils and to monitor pupils’ progress and educational needs.
- To safeguard pupils’ welfare and provide appropriate pastoral (and where necessary, medical) care.
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils at the School.
- To maintain relationships with alumni and the School community.
- For the purposes of management planning and forecasting, research and statistical analysis and to enable UCST to monitor the School’s performance.
- To monitor use of the School’s IT systems in accordance with the School’s Responsible Use Policy.
- To receive information about current and prospective pupils from any educational institution that they attended, including academic records, references and information relating to outstanding fees or payment history.
- For the purposes of pupil selection and to confirm the identity of prospective pupils and their parents.
- To make use of photographic images of pupils in School publications and on the School website in accordance with the School’s Child Protection (Safeguarding) Policy.
- To raise invoices and process payments in accordance with the School’s terms and conditions.
- For security purposes, and for regulatory and legal purposes (for example child protection and health and safety) and to comply with its legal obligations.
- To receive reports from any external bodies who may be working with pupils.



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- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School.
- To comply with our obligation as a UK Visas and Immigration Licenced Sponsor to ensure that every pupil has permission to be in the UK.
- To provide information about the activities of the School including by sending updates and newsletters by email and post.
- To organise trips and visits both in the UK and abroad.
- To determine the outcome of bursary applications and decide what level of bursary, if any, will be awarded.

3. The categories of personal data that we process

The types of personal data processed by the School will include:

1. Names, addresses, telephone numbers, email addresses and other contact details.
2. Academic records and assessment results, including examination scripts and marks.
3. Attendance information, behavioural records, any exclusion information.
4. Child protection records (where applicable).
5. References given or received by the School about pupils and information provided by previous educational establishments and / or other professionals or organisations working with pupils
6. Where pupils go after they leave the School.
7. For pupils enrolling for post-14 qualifications, the Learning Records Service will give us the unique learner number (ULN) and may also give us details about previous learning or qualifications.
8. Images captured by the School's CCTV system (in accordance with the School's CCTV Policy).
9. Fee payers' bank details.
10. Passport and visa details (where applicable) or other evidence of the pupil's right to live in the UK.
11. In the case of bursary applications, we will receive an assessment from Bursary Applications Limited regarding parent lifestyle and financial circumstances.
12. Personal characteristics such as a pupil's ethnic group, any special educational needs they may have and any relevant medical information.

4. The legal basis for the processing of pupil and parent data

The legal basis for processing the personal data listed in points 1-12 above are:

- To enable us to fulfil the terms of our contract with you.
- To comply with our legal obligations.
- Where the processing is necessary for the purposes of Surbiton High Schools and/or UCST's legitimate interests.

Information relating to racial or ethnic origin, religious beliefs or health (point 12) will only be processed with the explicit consent of the pupil or the pupil's parents. Further information regarding the purposes for which such data would be processed will be provided with the data collection form.



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5. Data Retention Periods

The pupil's educational record will move with the pupil to their next school. Where the School is the last school that the pupil attends the records will be kept until the pupil is 25 years old.

Admissions information will be retained for 6 years.

Information relating to financial transactions will be kept for 7 years.

Other data will be held in accordance with our Records Retention Schedule.

6. Data Security

Surbiton High School and UCST have in place technical and organisational measures that ensure a level of security appropriate to the sensitive nature of the personal data that we process.

7. Data Processors

We use third-party data processors to provide us with a management information system, accounts software, cloud storage services, apps and software for use in the classroom and to facilitate the secure transfer of data between the School and central office. This use of data processors will only take place if it is in compliance with the Data Protection Act 2018 and the General Data Protection Regulation. For further information please refer to our Data Sharing Policy and Procedure.

Decisions on whether we contract with these third-party processors are subject to a robust approval process and are based on a detailed assessment of the purpose for which the data processing is required, the level and sensitivity of data involved and the arrangements in place to store and handle the data. To be granted access to pupil-level data, data processors must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and procedures relating to the retention and use of data.

A list of the data processors currently used by Surbiton High School is available in Appendix A.

8. Sharing Data with Third Parties (other data controllers)

We may share data with the following recipients:

Keeping in touch and supporting the School

We would like to share pupil and parent personal data with both our Parent Association and our Alumni Network (Green & Silver Club). We will only do so if you have signed the appropriate consent form. Details of how these groups use your personal data are given on the consent form. Consent may be withdrawn at any time by writing to alumni@surbitonhigh.com



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Careers Guidance

We may share data with relevant organisations providing careers events, external careers interview and careers competition organisers, such as NHS England. Details are shared with the Morrisby Organisation in relation to profiling and psychometric testing and Durham University (CEM) in relation to progress and value-added monitoring.

Examination Boards

We will provide information to relevant Examination Boards in relation to any external examinations taken. The Examination Board will retain a copy of the data we share with them to maintain a permanent record of results achieved.

References

We will provide references and information regarding outstanding fees and payment history to any other educational institution that the pupil proposes to attend. We will also provide references to potential employers of current and past pupils.

Insurance

If you choose to participate in the voluntary insurance schemes and fees refund scheme, you will be asked to complete application forms provided by our insurance broker, Marsh Ltd, for the purpose of administering the scheme. If you choose to take out medical insurance through the School, the application forms will be sent to AXA PPP to enable them to administer the medical insurance scheme. The School uses Zurich Insurance PLC to administer our travel insurance for School trips. In the event of a claim we will provide relevant information to Zurich in relation to this and you may be asked to provide documentary evidence as appropriate. Our iPad insurance is administered by Summit Insurance Services Ltd trading as Compucover through our iPad leasing scheme provided by Albion Computers Plc. In the event of a lost or damaged iPad we will provide the relevant pupil's name in relation to any claim submitted.

School Inspections

On request we will share academic records with inspectors from the Independent Schools Inspectorate (ISI) and Ofsted.

Redwood Collections

When fees are unpaid we may share parental contact details and fee payment history with Redwood Collections, our debt collection agency. We will write to you to inform you that we may do this prior to taking such action.

UK Visas and Immigration

UCST is a Tier 4 Immigration Sponsor. As such we may be required from time to time to share personal data with UK Visas and Immigration, when they carry out sponsor inspections or when they need to assess an individual's immigration status.

Department for Education

We are required, by law, to pass some information about our pupils to the Department for Education (DfE). This information will, in turn, then be made available for use by the Local Authority. DfE may also share pupil level personal data that we supply to them, with third parties. This will only take place where legislation allows it to do so and it is in compliance with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).



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Decisions on whether DfE releases this personal data to third parties are subject to a robust approval process and are based on a detailed assessment of who is requesting the data, the purpose for which it is required, the level and sensitivity of data requested and the arrangements in place to store and handle the data. To be granted access to pupil level data, requestors must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and procedures relating to the retention and use of data.

For more information on how this sharing process works, please visit:

<https://www.gov.uk/guidance/national-pupil-database-apply-for-a-data-extract>

For information on which third-party organisations (and for which project) pupil level data has been provided to, please visit: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

If you need more information about how our local authority and / or DfE collect and use your information, please visit:

- our local authority at <https://www.kingston.gov.uk/>
- the DfE website at <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

We will not give information about our pupils to any other third parties without your consent unless the law and our policies allow us to do so.

9. Rights of the Data Subject

Data protection legislation gives individuals certain rights which are detailed below. If you wish to exercise these rights, please contact data.protection@surbitonhigh.com

Right of access to personal data “subject access request”

You have the right to access the personal data that the School holds about you. Requests need to be made in writing. If a child is over the age of 12 they will also need to sign the request. We take the security of personal data seriously, so we may ask you for proof of identity to verify that you are entitled to the information requested.

Right to withdraw consent

Where we have obtained your consent to specific processing activities you may withdraw this consent at any time.

Right to rectification

You have the right to have the personal data that we hold about you rectified if it is inaccurate or incomplete. We will respond to such requests within one month.

Right to erasure

You have the right to have personal data erased in certain specific circumstances. If you make such a request, we will consider whether the right to erasure applies and give you a full and reasoned response.



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Right to restrict processing

In certain circumstances you have the right to request that we restrict the processing of your personal data. If you make such a request, we will consider whether the right to restrict processing applies and give you a full and reasoned response.

If you disagree with a decision that we have taken regarding the processing of your personal data please contact UCST's Company Secretary, Steve Whiffen, on 01832 864538 or company.secretary@unitedlearning.org.uk

You also have the right to lodge a complaint with the information Commissioners Office on 0303 123 1113 or <https://ico.org.uk/for-the-public/>

10. Document Information

Version Number	2
Reason for amendment	Annual review; updates to Data Controller and Data Processor lists
Name of owner/author	Marinke Overwater, Data Protection Lead
Name of individual/department responsible	Marinke Overwater, Data Protection Lead
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Where available	United Hub, MIS, School Website
Review Date	April 2020 <i>This is an organic document which will be regularly updated</i>



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APPENDIX A – List of Data Processors engaged by Surbiton High School

7billionideas	ISAMS
Accelerated Reader	Linkedin
Airwatch	Microsoft Corporation
ALPS	Practice
Apple	Pearson Education
Chartwells Independent (Catering)	Quiver
Classoos	Royal European Coaches
Classroom Monitor	School Cloud Systems (Parents Evening booking)
Eclipse	School Sports
Edukit	SeeSaw
Elitech Lab (School Bus Tracker)	Showbie
Edurio	Shred on Site
Facebook	Smoothwall
First News	Spelling Shed
Foos	SpellZone
G Suite	Teachercentric Ltd (Show my Homework)
Google Analytics	Tapestry
Google Forms	Toucan Tech
Google Drive	TT Rock Stars
Hegarty Maths	Twitter
Hodder Education	Up Learn
Hopscotch	Voice Pro 7
Host Media (Learning Spaces)	Vocab Express
iDocio	Wetransfer
Interactive Schools (Admissions)	Wonde
Interactive Schools (Website)	Wufoo (Survey Monkey)
Instagram	YouTube
Ipsos Mori	Yumpu