SURBITON

HIGH SCHOOL

Pupil and Parent Privacy Notice

Contents

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 is the Data Protection Officer (DPO) for UCST and is responsible for ensuring that UCST complies with Data Protection Law. The can be contacted on 01832 864538 or company.secretary@unitedlearning.org.uk.

The School Data Protection Lead is responsible for ensuring that Surbiton High School complies with UCST's policies and procedures in relation to Data Protection. They can be contacted on data.protection@surbitonhigh.com

2. Why we collect and use Personal Data about pupils and parents

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, SEN and medical information, references, safeguarding files and information relating to outstanding fees or payment history.
- For the purposes of pupil selection and to confirm the identity and immigration status 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 policy on taking, storing and using images of children.
- To provide information about the activities of the School including by sending updates and newsletters by email and post.
- To raise invoices and process payments in accordance with the School's terms and conditions.
- To organise trips and visits both in the UK and abroad.

- To receive reports from any external bodies who may be working with pupils.
- To determine the outcome of bursary applications and decide what level of bursary, if any, will be awarded.
- 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 comply with our obligation as a UK Visas and Immigration Licenced Sponsor to ensure that every pupil has permission to be in the UK.
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School.

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 of the pupils during their time at School, including 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 and study 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, religious beliefs, 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 School's 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.

5. Data Retention Periods

The pupil's educational record and any safeguarding information will normally 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 alongside the pupil's educational record for successful admissions or for one year post unsuccessful admission or appeal.

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. For further information regarding how we keep personal data secure, please refer to our Security of Personal Data Policy.

7. Data Processors

We use third-party data processors to provide us with a variety of services, including accounts software, cloud storage services, apps and software to support pupil learning and to facilitate the secure transfer of data when required. This use of data processors will only take place in compliance with the Data Protection Act 2018 and UK GDPR (and any subsequent legislation related to data protection in applicable jurisdictions).

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. For further information, please refer to our Data Sharing Policy and Procedure.

A list of the data processers 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 (SHSPA) 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 SHSPA: chair@shspa.org.uk or Green & Silver Club: alumni@surbitonhigh.com.

Careers Guidance

We may share data with relevant organisations providing careers events and interviews, 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 and other awarding bodies

We will provide information to relevant Examination Boards and the Joint Council for Qualifications (JCQ) 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. The Examination Boards and awarding bodies routinely used at Surbiton High School include AQA, CCEA, Edexcel, OCR, WJEC, ABRSM, Trinity College London, DofE and NNAS.

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 on request.

Insurance

If you choose to participate in the voluntary 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. In the event of a claim, we will provide information direct to Marsh Ltd. If you choose to take out medical insurance through the School, you apply online direct with 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 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 relevant information, such as 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

Surbiton High School is a Student and Child Student Visa 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 audits, to assist with queries and when they need to assess an individual's immigration status.

Department for Education

We are legally required to pass some information about our pupils on 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 in compliance with the Data Protection Act 2018 and UK GDPR.

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. Any child over the age of 12 will need to make the request themselves or give us authority to deal with a parent or guardian on their behalf. 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.

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.

For further information regarding these rights, please refer to our Rights of the Data Subject Policy.

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

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/

Copies of any additional policies mentioned in this document are available on request on data.protection@surbitonhigh.com

10. Document Information

Version Number	6
Reason for amendment	Annual review; updates to Data Controller and Data Processor lists
Name of owner/author	Ruth Stillman, Data Protection Lead
Name of individual/department responsible	Ruth Stillman, Data Protection Lead
Target Audience	Public
Date issued	November 2017
Last updated	January 2024
Where available	School Website
Review Date	*This is an organic document which will be regularly updated*

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

Accelerated Reader (digital learning)
Access (finance system)
AccessIT (library system)
Airwatch (IT services)
Apple Inc. (IT services)
Atom Learning (digital learning)
Canva (Graphic design software)
Classoos (digital learning)
Classroom Monitor (assessment tracking)
CodeSpark (digital learning)
Cursor (admissions)
Dr Frost Maths (digital learning)
Edukit (wellbeing surveys)
Education Shed (digital learning)
Edurio (surveys)
Elitech Lab (transport services)
Equin Ltd (assessment tracking)
Eventbrite (event booking)
Facebook (social media)
First News (digital learning)
Google (IT services)
Gooseberry Planet (online safety training)
Hegarty Maths (digital learning)
Hodder Education (assessment tracking)
Hopscotch (digital learning)
Host Media (website services)
HubGem (admissions)
HubSpot (admissions)
ImpactEd (engagement analysis)
Instagram (social media)
Interactive Schools (admissions)
Innermedia (website services)
Ipsos Mori (surveys)
ISAMS (database services)
InVentry (visitor management)
KayScience (digital learning)

Lexington Independents (catering services)
LinkedIn (social media)
Mailgun (IT services)
Microsoft Corporation (IT services)
No more marking (digital learning)
Pearson Education (assessment)
Pobble (igital learning)
Oxbridge Applications (university applications)
Oxford University Press (digital learning)
Royal European Coaches (transport services)
Satchel One (digital learning)
SchoolsBuddy (co-curricular management)
School Cloud Systems (parents evening booking)
School Sports Ltd (co-curricular management)
SeeSaw (classroom journals)
Seneca (digital learning)
Shortlist Me (careers)
Showbie (digital learning)
Shred on Site (shredding services)
Signable (digital document management)
Smoothwall (IT services)
SpellZone (digital Learning)
Steer (wellbeing tracking)
Study Hall (digital learning)
Tapestry (classroom journals)
Tootoot (wellbeing support)
Toucan Tech (alumni database)
TT Rock Stars (digital Learning)
Twitter (social media)
Up Learn (digital learning)
Voice Pro 7 (digital learning)
Vocab Express (digital learning)
Wonde (database management)
Wufoo (surveys)
YouTube (social media)
Yumpu (digital learning)