



## Privacy notice for parents/carers – use of your child’s personal data

Under data protection law, individuals have a right to be informed about how our school uses any personal data that we hold about them. We comply with this right by providing ‘privacy notices’ (sometimes called ‘fair processing notices’) to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **pupils at our school**.

This privacy notice applies while we believe your child is not capable of understanding and exercising their own data protection rights.

Once your child is able to understand their rights over their own data (generally considered to be age 12, but this has to be considered on a case-by-case basis), you should instead refer to our privacy notice for pupils to see what rights they have over their own personal data. A copy of this can be found on the school website.

We, Bridlington School, Bessingby Road, Bridlington, YO16 4QU are the ‘data controller’ for the purposes of data protection law.

Our data protection officer is Helen Evans (see ‘Contact us’ below).

### The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about students includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents,
- Results of internal assessments and externally set examinations
- Student and curricular records
- Characteristics, such as eligibility for free school meals
- Details of rewards, achievements, behaviour issues or exclusions
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Filmed images as part of a school media promotion, school project work or staff training programme
- Your child’s signature
- Details of accidents occurring whilst under the school’s supervision



We may also collect, use, store and share (when appropriate) information about your child that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- Any medical conditions we need to be aware of, including physical and mental health
- Characteristics, such as ethnic background, or special educational needs
- Filmed images and audio recordings part of a school media promotion, school project work or staff training programme
- Photographs and CCTV images captured in school

## Why we use this data

We use this data to:

- Support student learning
- Monitor and report on student progress
- Provide appropriate pastoral care
- Protect student welfare
- Assess the quality of our services
- Administer admissions waiting lists
- Identify funding streams resulting from a student's postcode, characteristics and / or assessment results
- Comply with the law regarding data sharing
- Comply with exam board regulations
- Keep the school site safe
- Ensure that appropriate access arrangements are provided for those who require them
- Prepare students for the next stage of their education
- Promote the school and its activities

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

## Our legal basis for using this data

We only collect and use students' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest

Less commonly, we may also process students' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)
- We have legitimate interests in processing the data – this may happen whilst:
  - Promoting the objects and interests of the school, this includes fundraising and school trips.
  - Promoting your child's welfare and the welfare of other children

In addition, student's personal information may be used for the legitimate interests of others. For example, we may use information about your child when investigating a complaint made by another student.



Where we have obtained consent to use students' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using students' personal data overlap, and there may be several grounds which justify our use of this data.

## Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in data protection law:

- We have obtained your explicit consent to use your child's personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

## Collecting this information

While the majority of information we collect about students is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about your child will come from you, but we may also hold data about your child from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals
- Their previous school – this is usually transferred by a CTF (Common Transfer File) or secure transfer file



## How we store this data

We keep personal information about students while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. Our Information Retention Policy sets out how long we keep information about students. Under normal circumstances a student who leaves our school at the end of their education, would expect that their record be kept until the end of the academic year in which they turn 25 years old.

A full copy of the school's Information Retention Policy can be requested from Jan Elmhirst.

We have put in place appropriate security measures to prevent your child's personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your child's personal data securely when we no longer need it.

## Data sharing

We do not share information about students with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about students with:

- Other schools – for instance, where your child moves to another school and their education record needs to be transferred
- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns, exclusions, accident reporting and insurance claims
- The Department for Education – for statutory compliance, such as the school's census (this helps determine the funding made available to the school each year based on the student information received)
- The student's family and representatives - to report upon student progress and to share concerns relating to student welfare
- Examining bodies – to enable them to mark external exam papers and assessment components completed by students
- Ofsted – to meet our legal obligation to share information during an inspection
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as sharing allergy information with the catering team
- Our auditors - engaged from the Local Authority to inspect safeguarding, single central record and / or accident reporting
- Health authorities – where this is in the student's vital interest, for example if a student were taken suddenly ill with a medical condition known to the school, or they contracted a notifiable disease
- The Health & Safety Executive (HSE) – to report upon specific incidents / accidents occurring whilst under the school's supervision
- Health and social welfare organisations – to provide safeguarding information to appropriate agencies, such as social workers, youth and family support workers
- Professional advisers and consultants – School counsellors, where consent has been sought from the parent or the child (where they are able to consent)
- Police forces, courts, tribunals - where the school is legally obliged to provide the information requested, such as information from the student's educational record, CCTV
- Software / APP providers - external companies that provide software / apps used in school to process information where students' personal data may be stored, such as SIMS, Show My Homework (Where the school shares data with a third party processor, the same data protection standards that Bridlington School uphold are imposed upon the processor)
- Promotional materials of the school, including the school prospectus and social media pages – where you or your child has given the school consent to do so
- NHS Test & Trace, where you have been identified as someone who has been in close contact with a person that has tested positive for Covid-19
- Youth Support Services



## Youth support services

### Pupils aged 13+

Once our pupils reach the age of 13, we also pass pupil information to our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- youth support services
- careers advisers

A parent or guardian can object to any information in addition to their child's name, address and date of birth being passed to their local authority or provider of youth support services by informing us. This right is transferred to the child / pupil once they reach the age 16

Data is securely transferred to the youth support service via **[insert method used]** and is stored **[insert storage]** and held for **[insert data retention period]**.

### Pupils aged 16+

We will also share certain information about pupils aged 16+ with our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- post-16 education and training providers
- youth support services
- careers advisers

A child / pupil once they reach the age of 16 can object to only their name, address and date of birth is passed to their local authority or provider of youth support services by informing us.

Data is securely transferred to the youth support service via **[insert method used]** and is stored **[insert storage]** and held for **[insert data retention period]**.

For more information about services for young people, please visit our local authority website.

### The National Pupil Database (NPD)

Much of the data about pupils in England goes on to be held in the National Pupil Database (NPD).

The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the department.

It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

### Transferring data internationally

Where we transfer your child's personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting the Data Protection Officer.



## Parents and students' rights regarding personal data

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

If you make a subject access request, and if we do hold information about you or your child, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in a clear format

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our data protection officer.

Parents, or those with parental responsibility, also have the right to access their **child's educational record** (which includes most information about a pupil). This right applies as long as the pupil is aged under 18.

There are certain circumstances in which this right can be denied, such as if releasing the information might cause serious harm to the physical or mental health of the pupil or another individual, or if it would mean releasing exam marks before they are officially announced.

To make a request, please contact Data Protection Officer.

## Other rights

Under data protection law, you have certain rights regarding how your child's personal data is used and kept safe. For example, you have the right to:

- › Object to our use of your child's personal data
- › Prevent your child's data being used to send direct marketing
- › Object to and challenge the use of your child's personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- › In certain circumstances, have inaccurate personal data corrected
- › In certain circumstances, have the personal data we hold about your child deleted or destroyed, or restrict its processing
- › In certain circumstances, be notified of a data breach
- › Make a complaint to the Information Commissioner's Office
- › Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

Once your child is able to understand their rights over their own data (generally considered to be age 12, but this has to be considered on a case-by-case basis), we will need to obtain consent from your child for you to make these requests on their behalf.



## Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

- Helen Evans, telephone number 01262 672593
- Email: [dataprotection@bridlingtonschool.org.uk](mailto:dataprotection@bridlingtonschool.org.uk)

