

GDPR Privacy Notice

FOR THE EMPLOYEES, CHILDREN ATTENDING AND PARENTS/GUARDIANS OF RINGWOOD WALDORF SCHOOL

Ringwood Waldorf School is committed to protecting the privacy and security of your personal information.

This privacy notice describes how the School collects and uses personal information about children attending the School, and the parents/guardians of the children, and employees of the school in accordance with the General Data Protection Regulation (GDPR).

We are required under data protection legislation to notify you of the information contained in this privacy notice.

Contents:

Privacy notice for parents/guardians	page	2
Privacy notice for pupils	page	8
Privacy notice for staff	page	12

1. Privacy notice for parents/carers

Under data protection law, individuals have a right to be informed about how the 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 and parents We, Ringwood Waldorf School are the 'data controller' for the purposes of data protection law. Our Data Protection Officer is **Hannah Mathew** (see 'Contact us' below).

The personal data we hold on pupils

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

- Name, gender, date of birth, address, contact details
- Emergency contact and details, should the parents be unavailable
- Attendance records, e.g. number of and reasons for absence.
- Assessment results, e.g. internal assessments and externally set tests
- · Information relating to SEND
- Behavioural issues or exclusions
- · Records of any reportable death, injury, disease or dangerous occurrence
- Photographs
- Details of any medical conditions, including physical and mental health*
- Safeguarding information, e.g. child protection referral forms/child protection case details/reports*
- Non-reportable accident or incident reports*
- Race or ethnicity, spoken language and nationality*

*These are classed as a 'special category' of more sensitive data which require a higher level of protection

We may also hold data about pupils that we have received from other organisations, including other schools, local authorities and the Department for Education.

Why we use this data

We use this data to:

- Support pupil learning
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Protect pupil welfare
- Assess the quality of our services
- Administer admissions waiting lists
- Carry out research
- Comply with the law regarding data sharing

Some of the above ground for processing will overlap and there may be several grounds which will justify our use of personal information.

Our legal basis for using this data

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

- We need to comply with a legal obligation, e.g. to keep children safe (food allergies, medical conditions)
- We need it to perform an tasks that schools are required to perform as part of our statutory function

Less commonly, we may also process pupils' 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)

Where we have obtained consent to use pupils' 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 pupils' personal data overlap, and there may be several grounds which justify our use of this data.

Collecting this information

While the majority of information we collect about pupils is mandatory, there is some information that can be provided voluntarily. Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

How we store this data

We keep personal information about pupils 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. Please refer to <u>Information and Records Management Society's toolkit for schools</u>, which is available to view in the school office. This makes clear how long we are legally obliged to keep records for.

Data sharing

We do not share information about pupils 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 pupils with:

- Our local authority to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions.
- The Department for Education to provide information for statutory data collections.
- Your family and representatives to keep parents informed of progress and other information.
- Educators and examining bodies to assist in educational development.
- Our regulator, the Schools Inspection Service to enable them to check our records and ensure we are meeting the needs of our children.
- Suppliers and service providers to enable them to provide the service we have contracted them for.
- Financial organisations if required for fees or funding.
- Our auditors to ensure our financial records are correct and fees have been paid.
- Health authorities in the event of an emergency.
- Health and social welfare organisations to assist in the safeguarding and welfare of children and their families.

How secure is my data with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions

National Pupil Database

We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school census and early years census.

Some of this information is then stored in the <u>National Pupil Database</u> (NPD), which is owned and managed by the Department foe Education and provides evidence on school performance to inform research.

The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The Department for Education may share information from the NPD with other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

For more information, see the Department's webpage on how it collects and shares research data.

You can also contact the Department for Education with any further questions about the NPD.

The personal data we hold on parents/guardians

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

- Name, address
- Contact details, e.g. telephone numbers, personal email addresses
- Conversations with parents where employees of the school deem it relevant to the prevention of radicalisation or other aspects of the government's 'Prevent' strategy*
- Race or ethnicity, spoken language and nationality*

Why we use this data

We use this data to:

- · Make contact when needed
- · Ensure school fees are paid
- Comply with the law regarding data sharing

Some of the above ground for processing will overlap and there may be several grounds which will justify our use of personal information.

Our legal basis for using this data

We only collect and use pupils' 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 pupils' 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)

^{*}These are classed as a 'special category' of more sensitive data which require a higher level of protection

Where we have obtained consent to use your 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 your personal data overlap, and there may be several grounds which justify our use of this data.

Collecting this information

While the majority of information we collect about parents is mandatory, there is some information that can be provided voluntarily. Whenever we seek to collect information from you, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

How we store this data

We keep personal information while your child/ren 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. Please refer to <u>Information and Records Management Society's toolkit for schools</u>, which is available to view in the school office. This makes clear how long we are legally obliged to keep records for.

Data sharing

We do not share information about pupils 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 parents with:

- Our local authority to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions.
- Our regulator, Ofsted to enable them to check our records and ensure we are meeting the needs of our children.
- Suppliers and service providers to enable them to provide the service we have contracted them for.
- Financial organisations if required for fees or funding.
- Our auditors to ensure our financial records are correct and fees have been paid.
- Health authorities in the event of an emergency.
- Health and social welfare organisations to assist in the safeguarding and welfare of children and their families.

How secure is my data with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions

Transferring data internationally

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

Parents and pupils' 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.

Parents also have the right to make a subject access request with respect to any personal data the school holds about them.

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 an intelligible form

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 liaise with our Data Protection Officer.

Parents/carers do not have an automatic legal right to access their child's **educational record**. If a parent would like to request access, please contact our Administrator. A charge may apply.

Other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please liaise with our Data Protection Contact.

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 Contact.

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 liaise with our **DPO: Hannah Mathew**

This notice is based on the <u>Department for Education's model privacy notice</u> for pupils, amended for parents and to reflect the way we use data in this school.

2. Privacy notice for pupils

You have a legal right to be informed about how our school uses any personal information that we hold about you. To comply with this, we provide a 'privacy notice' to you where we are processing your personal data.

This privacy notice explains how we collect, store and use personal data about you.

We, Ringwood Waldorf School, are the 'data controller' for the purposes of data protection law.

Our Data Protection Officer is Hannah Mathew (see 'Contact us' below).

The personal data we hold

We hold some personal information about you to make sure we can help you learn and look after you at school.

For the same reasons, we get information about you from some other places too – like other schools, the local council and the government.

This information includes:

- Your contact details
- Your parents' details and emergency contact details
- Your test results
- Your attendance records
- Your characteristics, like your ethnic background or any special educational needs
- Any medical conditions you have
- Details of any behaviour issues or exclusions
- Photographs

Why we use this data

We use this data to help run the school, including to:

- Get in touch with you and your parents when we need to
- Check how you're doing in exams and work out whether you or your teachers need any extra help
- Track how well the school as a whole is performing
- Look after your wellbeing and keep you safe

Our legal basis for using this data

We will only collect and use your information when the law allows us to. Most often, we will use your information where:

- We need to comply with the law (e.g. to keep you safe if you have food allergies or medical conditions)
- We need to use it to carry out a task in the public interest (in order to provide you with an education)

Sometimes, we may also use your personal information where:

- You, or your parents/carers have given us permission to use it in a certain way
- We need to protect your interests (or someone else's interest)

Where we have got permission to use your data, you or your parents/carers may withdraw this at any time. We will make this clear when we ask for permission, and explain how to go about withdrawing consent.

Some of the reasons listed above for collecting and using your information overlap, and there may be several grounds which mean we can use your data.

Collecting this information

While in most cases you, or your parents/carers, must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data.

We will always tell you if it's optional. If you must provide the data, we will explain what might happen if you don't.

How we store this data

We will keep personal information about you while you are a pupil at our school. We may also keep it after you have left the school, where we are required to by law.

We use the <u>Information and Records Management Society's toolkit for schools</u>, which is available to view in the school office. This sets out how long we must keep information about pupils.

Data sharing

We do not share personal information about you with anyone outside the school without permission from you or your parents/carers, unless the law and our policies allow us to do so.

Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you with:

- Our local authority to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions.
- The Department for Education to provide information for statutory data collections.
- Your family and representatives to keep your parents informed of how you're getting on at school.
- Educators and examining bodies to assist in your educational development.
- Our regulator, the Schools Inspection Service to enable them to check our records and ensure we
 are meeting the needs of our children.
- Suppliers and service providers to enable them to provide the service we have contracted them for.
- Financial organisations if required for fees or funding.
- Our auditors to ensure our financial records are correct and fees have been paid.
- Health authorities in the event of an emergency.
- Health and social welfare organisations to assist in the safeguarding and welfare of children and their families.

How secure is my data with third-party service providers?

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions

National Pupil Database

We are required to provide information about you to the Department for Education (a government department) as part of data collections such as the school census.

Some of this information is then stored in the <u>National Pupil Database</u>, which is managed by the Department for Education and provides evidence on how schools are performing. This, in turn, supports research.

The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards and others.

The Department for Education may share information from the database with other organisations which promote children's education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data.

You can find more information about this on the Department for Education's webpage on how it collects and shares research data. You can also contact the Department for Education if you have any questions about the database.

Transferring data internationally

Where we share data with an organisation that is based outside the European Economic Area, we will protect your data by following data protection law.

Your rights

How to access personal information we hold about you

You can find out if we hold any personal information about you, and how we use it, by making a 'subject access request', as long as we consider that you can properly understand your rights and what they mean.

If we do hold information about you, we will:

- · Give you a description of it
- Tell you why we are holding and using it, and how long we will keep it for
- Explain where we got it from, if not from you or your parents
- Tell you who it has been, or will be, shared with
- Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)
- Give you a copy of the information

You may also ask us to send your personal information to another organisation electronically in certain circumstances.

If you want to make a request please liaise with our Data Protection Contact.

Your other rights over your data

You have other rights over how your personal data is used and kept safe, including the right to:

- Say that you don't want it to be used if this would cause, or is causing, harm or distress
- · Stop it being used to send you marketing materials
- Say that you don't want it used to make automated decisions (decisions made by a computer or machine, rather than by a person)
- Have it corrected, deleted or destroyed if it is wrong, or restrict our use of it
- Claim compensation if the data protection rules are broken and this harms you in some way

Complaints

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we've done something wrong.

You can make a complaint at any time by contacting our Data Protection Officer, Hannah in the office.

You can also complain to the Information Commissioner's Office in one of the following ways:

- 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 liaise with our DPO: Hannah Mathew

This notice is based on the <u>Department for Education's model privacy notice</u> for pupils, amended to reflect the way we use data in this school.

3. Privacy notice for staff

Under data protection law, individuals have a right to be informed about how the 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 individuals we employ, or otherwise engage, to work at our school.

We, Ringwood Waldorf School, are the 'data controller' for the purposes of data protection law.

Our Data Protection Officer is Hannah Mathew (see 'Contact us' below).

The personal data we hold

We process data relating to those we employ, or otherwise engage, to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details such as name, title, addresses telephone numbers, personal email addresses.
- · Date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Personnel files including performance information, outcomes of any disciplinary and/or grievance procedures
- Absence data
- · Copy of driving license if applicable
- Photographs
- Data about your use of the school's information and communications system
- Records of any reportable death, injury, disease or dangerous occurrence.

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Health, including any medical conditions, and sickness records

Why we use this data

The purpose of processing this data is to help us run the school, including to:

- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Check an employee is legally entitled to work in the UK.
- Enable you to be paid, and, if appropriate, deducting tax and NI contributions
- Education, training and development requirements
- Gathering evidence for possible grievance or disciplinary hearings.
- Dealing with legal disputes involving employees, including accidents at work.
- Support effective performance management
- Inform our recruitment and retention policies
- Comply with health and safety obligations
- Managing sickness absence
- Monitor your use of our information and communication systems to ensure compliance with our IT policies.

· Equal opportunities monitoring

Some of the above ground for processing will overlap and there may be several grounds which will justify our use of personal information.

Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

Collecting this information

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

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.

How we store this data

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our the *Information and Records Management Society's toolkit for schools*, which is available to view in the school office. This makes clear how long we are legally obliged to keep records for.

Data sharing

We do not share information about you with any third party without your 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 you with:

- Our local authority to meet our legal obligations to share certain information with it, such as safeguarding concerns.
- The Department for Education
- Our regulator, the School's Inspection Service to enable adequate inspection of our School.
- Suppliers and service providers to enable them to provide the service we have contracted them for, such as payroll
- Our auditors to ensure our financial records are correct
- Health authorities in the event of an emergency
- Police forces, courts, tribunals when necessary as part of legal process
- Employment and recruitment agencies if applicable.

Transferring data internationally

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

Your rights

How to access personal information we hold about you

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

If you make a subject access request, and if we do hold information about you, 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
- 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 an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please liaise with our Data Protection Contact.

Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your 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, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please liaise with our Data Protection Contact.

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 liaise with our Data Protection Contact.

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

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please liaise with our **Data Protection Officer**:

Hannah Mathew

This notice is based on the <u>Department for Education's model privacy notice</u> for the school workforce, amended to reflect the way we use data in this school.