

## Student Privacy Notice

### 1. Scope

All data subjects whose personal data is collected, in line with the requirements of the GDPR.

### 2. Responsibilities

- 2.1 The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to St Paul's School for Girls collecting or processing their personal data.
- 2.2 All governors, employees and volunteers of St Paul's School for Girls who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

### 3. Privacy notice

We are a secondary comprehensive school for girls aged 11 – 18 engaged in the teaching and the care and welfare of the pupils. St Paul's is a unique school, founded in 1908 by the Sisters of Charity of St Paul the Apostle for the education of Catholic girls and now, over 100 years later, still retains the same sense of community.

Our Data Protection Officer can be contacted here:

spellowe@stpaulgl.bham.sch.uk

0121 454 0895

The personal data we would like to collect from/process on you is:

<b>Personal data type:</b>	Where St Paul's School for Girls obtained the personal data from if it has not been collected directly from you, the data subject
Personal data	From you
Previous school records	From previous school
Parents/Carers details ,eg NHS No:	From you

The personal data we collect will be used for the following purposes:

- Administering your (or your child's) progress through the education system
- Maintaining records of your (or your child's) participation in school life.

Our legal basis for processing for the personal data:

- Compliance with legal obligations to ensure children receive education, attend school on a regular basis, and are kept safe.

Any legitimate interests pursued by us, or third parties we use, are as follows:

- To enable you (or your child) to participate in extra-curricular school activities.

The special categories of personal data concerned are:

- Ethnic origin
- Religious beliefs
- Biometric data
- Health and welfare data

### 3.1 Consent

As we not relying on consent as the legal basis for processing your (or your child's) data we do not need to seek your permission to process the data. By issuing this notice to you we are fulfilling our legal duty to inform you that the processing is taking place.

### 3.2 Disclosure

St Paul's School for Girls will not pass on your personal data to third parties without first obtaining your consent. The following third parties will receive your personal data for the following purpose(s) as part of the processing activities:]

<b>Organisation and location, including any third country (non-EU) international organisations</b>	<b>Safeguards in place to protect your personal data</b>
Photographers for school records	Letter received from photographer
Biometrics to provide food at school	Letter received from Taylor Shaw
Inventry ID badges for ID and attendance/safeguarding	Letter received from Inventry
Local authority	Compliance with legal obligations
Ofsted	Compliance with legal obligations
Exam boards	Compliance with legal obligations
Parishes	Names only
Careers	Compliance with legal obligations
Firefly	Letter received from Firefly

### 3.3 Retention period

St Paul's School for Girls will process personal data for length of stay at school and will store the personal data until student reaches 25 years of age and beyond if there are any Child Protection issues.

### 3.4 Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.

- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that St Paul’s School for Girls refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.6 below.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.

### 3.5 Complaints

In the event that you wish to make a complaint about how your personal data is being processed by St Paul’s School for Girls or third parties acting on our behalf, or how your complaint has been handled, you have the right to lodge a complaint directly with the Information Commissioner’s Office and St Paul’s School for Girls Data Protection Officer.

The details for each of these contacts are:

	<b>Supervisory authority contact details</b>	<b>Data Protection Officer contact details</b>
Name:	Information Commissioner's Office	Sheila Pellowe
Address line	Wycliffe House	Vernon Road
Address line	Water Lane	B16 9SL
Email:	casework@ico.org.uk	spellowe@stpaulgl.bham.sch.uk
Telephone:	0303 123 1113 (local rate)	0121 454 0895

### 3.6 Privacy statement

Read more about how and why we use your data on school website [www.stpaulgl.bham.sch.uk/polices](http://www.stpaulgl.bham.sch.uk/polices)

#### **4. Online privacy statement**

##### Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

“any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person”.

##### How we use your information

This privacy notice tells you how we, St Paul's School for Girls, will collect and use your personal data.

##### Why does St Paul's School for Girls need to collect and store personal data?

In order for us to provide you with food, photographs for ID, pupil allowances, work experience, curricular and extra-curricular visits, exam qualifications, criteria to determine school places, we need to collect personal data for correspondence purposes and/or information to inform the census for the Local Authority which funds school, careers, travel companies, exam boards, parishes to provide evidence of religion . In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy. In terms of being contacted for marketing purposes we would contact you for additional consent.

##### Will St Paul's School for Girls share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to St Paul's School for Girls in the course of dealing with you. Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with our own procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

##### How will St Paul's School for Girls use the personal data it collects about me?

St Paul's School for Girls will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavour to keep your information accurate and up-to-date, and not keep it for longer than is necessary. St Paul's School for Girls is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be

kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Under what circumstances will St Paul's School for Girls contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

Can I find out the personal data that St Paul's School for Girls holds about me?

St Paul's School for Girls at your request, can confirm what information we hold about you and how it is processed. If St Paul's School for Girls does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of St Paul's School for Girls or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it was not collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

What forms of ID will I need to provide in order to access this?

St Paul's School for Girls accepts the following forms of ID when information on your personal data is requested:

current passport bearing a photograph and signature, or  
driving license, bearing a photograph and signature.

If you do not hold a current passport or driving license two copies of other identification documents may be accepted as an alternative, such as:

birth certificate;

utility bill from preceding three months bearing current address;

current vehicle registration document;

bank statement from preceding three months;

current rent book.

Contact details of the Data Protection Officer

	<b>Data Protection Officer contact details</b>
Contact Name:	Sheila Pellowe
Address line	Vernon Road
Address line	B16 9SL
Email:	spellowe@stpaulgl.bham.sch.uk
Telephone:	0121 454 0895

The Governing Body is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with the review requirements stated above. A current version of this document is available to all members of staff.

This policy was approved by the Governing Body on 01/05/2018 and is issued on a version controlled basis.