



DATA PROTECTION POLICY

THIS POLICY

- This policy 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 (referred to in this policy as "parents").
- It applies in addition to the school's terms and conditions, and any other information the school may provide about a particular use of personal data, including e.g. the school's policy on taking, storing and using images of children.
- Anyone who works for, or acts on behalf of, the school (including staff, volunteers, governors and service providers) should also be aware of and comply with the school's data protection policy for staff, which also provides further information about how personal data about those individuals will be used.

RESPONSIBILITY FOR DATA PROTECTION

- In accordance with the Data Protection Act 2018 ('the Act'), and any subsequent legislation (e.g. GDPR 2018) the school has notified the Information Commissioner's Office of its processing activities. The school's ICO registration number is Z4606686 and its registered address is Brooklyn Road, Woking, Surrey, GU22 7TP.
- The School's Bursar is designated as Chief Privacy Officer (CPO) and is primarily responsible for ongoing Data Protection Compliance. The CPO will endeavour to ensure that all personal data is processed in compliance with this policy and the Act.
- The school has a General Data Privacy Statement which is published on the school's website Homepage and on the wall of the school's main reception area.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

- The school may process a wide range of personal data about individuals including current, past and prospective pupils, their Parents, the School's Staff and Governors as part of its operation, including by way of example:
 - names, addresses, telephone numbers, e-mail addresses and other contact details;
 - car details (about those who use our car parking facilities);
 - bank details and other financial information, e.g. about parents who pay fees to the school;
 - past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
 - where appropriate, information about individuals' health, and contact details for their next of kin;
 - 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; and
 - images of pupils (and occasionally other individuals) engaging in school activities (in accordance with the school's policy on taking, storing and using images of children);
- Generally, the school receives personal data from the individual directly (or, in the case of pupils, from parents). However in some cases personal data may be supplied by third parties (for example another school, or other professionals or authorities working with that individual), or collected from publicly available resources.
- The school may, from time to time, need to process "sensitive personal data" regarding individuals. Sensitive personal data includes information about an individual's physical or mental health, race or ethnic origin, political or religious beliefs, sex life, trade union membership or criminal records and proceedings. Sensitive personal data is entitled to special protection under the Act, and will only be processed by the school with the explicit consent of the appropriate individual, or as otherwise permitted by the Act.

In all cases the school will clearly state the reason why data is collected, how it will be stored and the retention period at the point of collection.

USE OF PERSONAL DATA BY THE SCHOOL

- The school will use (and where appropriate share with third parties – see below) personal data about individuals for a number of purposes as part of its operations, including as follows:
 - For the purposes of pupil selection and to confirm the identity of prospective pupils and their parents;
 - To provide education services (including SEN), career services, and extra-curricular activities to pupils; monitoring pupils' progress and educational needs; and maintaining relationships with alumni and the school community;
 - For the purposes of management planning and forecasting, research and statistical analysis, and to enable the relevant authorities to monitor the school's performance;
 - To give and receive information and references about past, current and prospective pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils;
 - To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the school;
 - To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so, for example for medical advice, insurance purposes or to organisers of school trips;
 - To monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's IT Acceptable Use policy (part of the E-Safety policy).
 - To make use of photographic images of pupils in school publications, on the school website and on the school's social media channels (Facebook, Twitter & LinkedIn) in accordance with the school's policy on taking, storing and using images of children;
 - For security purposes, and for regulatory and legal purposes (for example child protection and health and safety) and to comply with its legal obligations; and
 - Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

DATA SHARING

- The school will share data with certain third party organisations in order to fulfil its contractual responsibilities or to facilitate the smooth operation of the school's educational practices.
- Data is only shared with third parties once the assurance of the organisation's own Data Protection processes has been obtained.

KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

- The school will use the contact details of parents, alumni and other members of the school community to keep them updated about the activities of the school, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the school may also:
- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the school community, such as the Friends of Greenfield School (FrOGS) and the Greenfield Alumni;
- Contact parents and/or alumni [(including via the organisations above)] by post and email in order to promote and raise funds for the school [and, where appropriate, other worthy causes];
- Should you wish to limit or object to any such use, or would like further information about them, please contact the Bursar (CPO) in writing.

RIGHTS OF ACCESS TO PERSONAL DATA ("SUBJECT ACCESS REQUEST")

- From May 2018 data protection legislation gives you a number of rights regarding your information.
- Some of these are new rights whilst others build on your existing rights. Your rights are as follows:
 - Rectification: if information is incorrect you can ask us to correct it.
 - Access: you can also ask what information we hold about you and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to.
 - Deletion: you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.

- Portability: you can request the transfer of your information to you or to a third party in a format that can be read by computer. This applies where (a) the information has been provided by you; (b) the basis that we are relying on to process your information is consent or contract (please see "Our legal grounds for using your information" below); and (c) the information is being processed by us on computer.
 - Object: you may object to us using your information where:
 - we are using it for direct marketing purposes (e.g. to send you the School newsletter or termly magazine);
 - we are relying on either the legitimate interests or performance of a task carried out in the public interest legal ground to use it - please see the section "Our legal grounds for using your information" above;
 - we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of staff for historical reasons.
 - Restriction: our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.
- The Bursar can give you more information about your data protection rights. To exercise any of your rights you can submit your request in writing to the Bursar (CPO).
The school will endeavour to respond to any such written requests (known as "subject access requests") as soon as is reasonably practicable and in any event within statutory time-limits (30 days).
 - You should be aware that certain data is exempt from the right of access under the Act. This may include information which identifies other individuals, or information which is subject to legal professional privilege. The school is also not required to disclose any pupil examination scripts (though examiners' comments may fall to be disclosed), nor any reference given by the school for the purposes of the education, training or employment of any individual.
 - Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the school, they have sufficient maturity to understand the request they are making. Pupils aged 12 or over are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested. As Greenfield pupils are aged between 3 and 11, this could only apply after the pupil has left, whilst they are at Greenfield the bullet point below would apply. All subject access requests from pupils will therefore be considered on a case by case basis.
 - A person with parental responsibility will generally be expected to make a subject access request on behalf of younger pupils. A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

WHOSE RIGHTS

- The rights under the Act belong to the individual to whom the data relates. However, the school will in most cases rely on parental consent to process personal data relating to pupils (if consent is required under the Act) unless, given the nature of the processing in question, and the pupil's age and understanding, it is more appropriate to rely on the pupil's consent. Parents should be aware that in such situations they may not be consulted.
- In general, the school will assume that pupils consent to disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare, unless, in the school's opinion, there is a good reason to do otherwise.
- However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the school will maintain confidentiality unless, in the school's opinion, there is a good reason to do otherwise; for example where the school believes disclosure will be in the best interests of the pupil or other pupils.
- Pupils are required to respect the personal data and privacy of others, and to comply with the school's E-Safety Policy which contains the IT Acceptable Use policy and the school rules.

DATA ACCURACY AND SECURITY

- The school will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the Bursar (CPO) of any changes to information held about them.
- An individual has the right to request that inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under the Act) and may do so by contacting the Bursar (CPO) in writing.
- The school will take appropriate technical and organisational steps to ensure the security of personal data about individuals. All staff will be made aware of this policy and their duties under the Act.

- Data is retained for as long as is appropriate depending on the data classification, retention periods are defined in the school's Data Retention Policy.
- The Bursar is responsible for ensuring Data is disposed securely at the expiry of the appropriate retention period.

DATA BREACHES

- Data Breaches should be reported to the ICO if the breach will result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage. Such matters may also require a separate report to the Charity Commission.
- If the school suspects a breach, a risk assessment should be completed immediately to assess if the breach warrants reporting to the ICO.
- The school will notify the ICO of a breach within 72 hours of becoming aware of it, even if the school does not have all the details yet.
- The school has to inform affected individuals about a breach when it is likely to result in a high risk to their rights and freedoms. It must inform affected individuals without undue delay.
- The school documents all breaches, even if they don't all need to be reported
- Serious breaches should be reported to the ICO using the security breach helpline on 0303 123 1113 (open Monday to Friday, 9am to 5pm). Select option 3 to speak to staff who will record the breach and give advice. Or, use the security breach notification form, which should be sent to the email address:

casework@ico.org.uk

or by post to the ICO office address:

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

The security breach notification form can be found here:

https://ico.org.uk/media/fororganisations/documents/2666/security_breach_notification_form.doc

QUERIES AND COMPLAINTS

- Any comments or queries on this policy should be directed to the DPO using the following contact details
The Bursar (CPO)
Greenfield School
Brooklyn Road
Woking
Surrey
GU22 7TP
- If an individual believes that the school has not complied with this policy or acted otherwise than in accordance with the Act, they should utilise the school Complaints Policy (for parents) or the Grievance process (for employees) and should also notify the Bursar (CPO) or Headmistress.

Policy Reviewed by:



Janet Day

Chairman of the Board of Governors

Date : 7 May 2019

Next Review Due: May 2020