



REDMAIDS'
HIGH SCHOOL
FOR GIRLS | BRISTOL

HOW WE USE YOUR DATA

PRIVACY NOTICE FOR JUNIOR SCHOOL PUPILS

Pupil Privacy Notice - Key Information

This notice contains the key information about how and why we collect your child's personal data and what we do with that data.

Personal data is data that identifies your child as an individual and relates to your child. For example, data about how well your child is doing at School and any data that we need to take care of your child. Photographs and videos of your child also count as their personal data.

We encourage you to read the full version of our pupil privacy notice below, which is also published on the School's website:

<https://www.redmaidshigh.co.uk/about-us-school-policies>.

The full version includes additional points, such as:

- the rights your child has in their data including what decisions you can make about your child's data;
- for how long the School retains your child's personal data; and
- our legal bases for using your child's personal data.

Our primary reason for using your child's personal data is to provide them with an education.

We set out below examples of the different ways in which we use your child's personal data and where that personal data comes from.

- Admissions forms and website enquiry forms give us lots of personal data about your child. We get data from you, your child's teachers and other pupils. Your child's old school also gives us data about your child so that we can teach and care for your child.
- Sometimes we get data from your child's doctors and other professionals where we need this to look after your child.
- We may need to report some of your child's data to the government (e.g. the Department for Education). We will need to tell the local authority

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that your child attends the School, if your child leaves the School or let them know if we have any concerns about your child's welfare.

- We may use photographs or videos of your child for the School's website, social media sites, in press releases, adverts, at School open events or in the School prospectus to show prospective pupils what we do here and to advertise the School. We may continue to use these photographs and videos after your child has left the School.
- Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson or sometimes during remote learning.
- We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what w/our pupils have been doing.
- We use CCTV and minibus dashboard cameras to make sure the School site is safe. CCTV is not used in private areas such as changing rooms.
- We may keep details of your child's address when they leave so we can invite them to join our virtual alumnae network; RHSA Connect. Full details of our alumnae association can be obtained from our Development Office at development@redmaidshigh.co.uk.

The school's Compliance Officer is responsible for managing how we look after personal data. They can answer any questions which you may have about how we use your child's personal data and can be contacted directly at privacy@redmaidshigh.co.uk

Introduction

This notice is to help you understand **how** and **why** we collect your child's personal data and **what** we do with that data. It also explains the decisions that you can make about your child's data.

We are giving you this notice because you are able to exercise your child's data protection rights on their behalf. When your child is older (usually when they reach the age of 12) they will be considered mature enough to exercise their own data protection rights.

If you have any questions about this notice please talk to our Compliance Officer. You can contact them directly at privacy@redmaidshigh.co.uk.

What is "personal data"?

Personal data is data that the School holds about your child and which identifies your child.

This includes data such as their date of birth and address as well as things like exam results, medical details and behaviour records. We will also hold data such as your child's religion or ethnic group for the purposes of meeting their educational needs. CCTV, photos and video recordings of your child are also personal data where they make your child identifiable.

Our legal bases for using your child's data

This section contains data about the legal basis that we are relying on when handling your child's data.

The two tables below contain a general description of the different legal bases but we have also used a colour code system so that you can see which bases we are relying on for each of the purposes described at paragraphs 1 to 39 below.

Legitimate interests ("LI")

This means that the School is using your child's data when this is necessary for the School's legitimate interests or someone else's legitimate interests. We won't rely on this basis when your child's interests and fundamental rights override our legitimate interests. Specifically, the School has a legitimate interest in:

- Providing your child (and other children) with an education and making sure that your child is behaving properly.
- Complying with our agreement with you for your child to be at the School.
- Keeping the school buildings safe.
- Making sure that the School is well managed and that we protect the School's reputation.
- Safeguarding and promoting your child's welfare and the welfare of other children.

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- Promoting the objects and interests of the School. This includes fundraising e.g. if we want to raise money to develop our facilities, and using photographs of your child in promotional material such as on our School's website, social media sites, in press releases, adverts, at School open events or in the School prospectus.
- Ensuring that all relevant legal obligations of the School are complied with (for example in relation to inspections).
- Using your child's data in connection with legal disputes.
- Facilitating the efficient operation of the School.

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

Legal obligation ("LO")

Where the School needs to use your child's data in order to comply with a legal obligation, for example to report a concern about your wellbeing to Children's Services. We will also have to disclose your child's data to third parties such as the courts, the local authority or the police where legally obliged to do so.

Vital interests

In limited circumstances we may use your child's data to protect your child's vital interests or the vital interests of someone else (e.g. if your child or they are seriously hurt).

Performance of a task carried out in the public interest (or carrying out public tasks) ("PI")

This applies where what we are doing is for the benefit of people generally. The following are examples of where this applies:

- providing your child and others with an education;
- safeguarding and promoting your child's welfare and the welfare of other children;
- facilitating the efficient operation of the School; and
- ensuring that we comply with all of our legal obligations.

The School must also comply with an additional condition where it processes special categories of personal data. These special categories include: personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic data, health data, and data about sex life or orientation.

Substantial public interest ("SPI")

The School is allowed to use special categories of personal data where doing so is necessary in the substantial public interest. This is similar to "public interest" in the table above. For example the School will use data about your

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child's health to look after them. We may also use other types of special category personal data about your child to provide them with an education, to look after your child and their classmates or when the School is inspected.

Employment and social protection and social security law ("ESP ")

There will be times when the School needs to use your child's data because we are an employer. Also the School will use your child's data to comply with social protection law (e.g. to look after your child) and social security laws. Social protection law is concerned with preventing, managing, and overcoming situations that adversely affect people's wellbeing.

Vital interests

In limited circumstances we may use your child's data to protect your child's vital interests or the vital interests of someone else (e.g. if your child or they are seriously hurt).

Legal claims ("LC")

The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share data with our legal advisors and insurers. This applies whenever sharing special category data is necessary in relation to legal claims.

Medical purposes ("MP")

This includes medical treatment and the management of healthcare services.

How and why does the School collect and use your child's personal data?

We set out below different ways in which we use personal data and where this personal data comes from. The letters highlighted in different colours refer to the legal bases we are relying on. Please see the section above for an explanation.

1. Our primary reason for using your child's data is to provide your child with an education - LI, PI, SPI.
2. The School will also use your child's personal data to safeguard and promote your child's welfare and the welfare of others (for example, so that we can look after your child if they are hurt) - LI, PI, SPI, ESP, MP.

The admissions forms which you complete give us personal data about your child. We get data from your child, his / her teachers and other pupils. Your child's old school also gives us data about how well your child did and any difficulties they had if we need this data to teach and care for them.

Sometimes we get data from your child's doctor and other professionals where we need this to look after your child.

3. We will use data about your child during the admissions process e.g. when marking entrance exams and considering any data provided on the

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registration form. We may let your child's previous school know if they have been offered a place at the School - LI, PI, SPI.

4. We need to tell all appropriate members of staff if your child has a health issue - LI, PI, SPI.
5. We will tell your child's teachers if he or she has special educational needs or requires extra help with some tasks - LI, PI, SPI.
6. We will need to share data about your child (e.g. about their health and wellbeing) with the School nurse or counsellor] - LI, PI, SPI, ESP, MP.
7. If we have data that your child suffers from an allergy we will use this data so that we can look after your child - LI, PI, SPI, VI, MP.
8. If we have data that your child suffers from a disability we will use data about that disability to provide support - LI, PI, SPI, ESP and in certain circumstances, MP.
9. Where appropriate, the School will have data about your religious beliefs and practices. For example, if your child does not eat certain foods - LI, PI, SPI.
10. We use CCTV to make sure the School site is safe and minibus forward facing dashboard cameras to capture any footage in the case of an incident. CCTV is not used in private areas such as changing rooms - LI, PI, SPI.
11. We will be told if your child is eligible to receive free school meals so that we can provide these - LI, PI, SPI.
12. We record your child's attendance and if he or she has time away from the School we record the reason(s) why - LI, PI, SPI.
13. We will need to report some of your child's data to the government (e.g. the Department for Education). We will need to tell the local authority that your child attends the School, if your child leaves the School or let them know if we have any concerns about your child's welfare - LI, LO, PI, SPI, ESP.
14. We are legally required to provide the Department for Education with certain data about your child. Some of this data will be stored on the National Pupil Database. Organisations can request data from the National Pupil Database which includes data about your child. But they are only allowed to do this for limited purposes and they must be very careful about how they use your child's data. More information can be found here - <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information> - LO, SPI.
15. We will need data about any court orders or criminal petitions which relate to your child. This is so that we can safeguard your child's welfare and wellbeing and the other pupils at the School - LI, PI, SPI.

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- 16.If your child is from another country we have to make sure that they have the right to study in the UK. Sometimes the government will ask us to provide data as part of our reporting requirements. In addition to this we have a duty to provide data about your child to UK Visas and Immigration - LI, LO, PI, SPI.
17. If your child needs a visa to study with us then we will sometimes share your data with a company that helps us with our visa applications - LI
- 18.
- 19.Dependent on where your child will go when they leave us we will provide their data to other schools and colleges. For example, we will share data about your child's exam results and provide references - LI, PI, SPI.
- 20.We may need to share data about your child with the Health and Safety Executive (a government organisation) or with Public Health England if there is a health and safety issue at the School - LI, LO, SPI.
- 21.When we are inspected by the Independent Schools Inspectorate we will have to make your child's data available to the inspectors to assist them with their inspection - LI, LO, PI, SPI.
- 22.If the School receives a complaint or grievance which involves your child we will need to use their data to deal with this appropriately. For example, if you make a complaint or if another parent complains about an issue which involves your child - LI, PI, SPI.
- 23.The School may share data about your child with the local authority for the purpose of the preparation, implementation and / or review of your child's Statement of Special Educational Needs or Education Health and Care Plan - LI, PI, LO.
- 24.If your child has a safeguarding file, we are legally required to pass this file to their next school - LI, LO, PI, SPI, ESP.
- 25.If your child takes public examinations (e.g Music Board Examinations) we will need to share data about them with examination boards. For example, if your child requires extra time in exams - LI, PI, SPI.
- 26.We may need to share data with the police or our legal advisers if something goes wrong or to help with an enquiry. For example, if one of your child's classmates is injured at School or if there is a burglary - LI, LO, PI, SPI, LC.
- 27.We use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We will share your child's data with them if this is relevant to their work - LI, PI, SPI.
- 28.If your child has misbehaved in a serious way, we may need to share data with the police and we may need to use data about the action taken by the police - LI, LO, PI, SPI, ESP.

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29. We may share some data with our insurance company to make sure that we have the insurance cover that we need - **LI, PI, SPI, LC**.
30. If you have appointed an agent to act on your behalf during the admissions process, then we may share data about your child with them. For example, we may send them the acceptance letter so that they can pass this on to you - **LI**.
31. We will share your child's academic and (where fair) their behaviour records with you or their guardians so you can support their schooling - **LI, PI, SPI**.
32. We will monitor your child's use of email, the internet and mobile electronic devices (e.g. iPads) whilst they are on the school network. This is to check that your child is not misbehaving when using this technology or putting themselves at risk of harm. If you would like more information about this you can read our ICT Acceptable Use Policy (<https://www.redmaidshigh.co.uk/about-us-school-policies>) or speak to the Headteacher's PA - **LI, SPI**.
33. We may use photographs or videos of your child for the School's website, social media sites, in press releases, adverts, at School open events or in the School prospectus to show prospective pupils what we do here and to advertise the School. We will continue to use these photographs and videos after your child has left the School - **LI, PI**.
34. Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson or sometimes during remote learning - **LI**.
- Our full approach to photography is outlined in our Taking, Storing and Using Images of Pupils Policy, available on our website:
<https://www.redmaidshigh.co.uk/about-us-school-policies>.
- If you have any concerns about us using photographs or videos of your child please speak to the Headteacher's PA.
35. We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing - **LI**.
36. If your child does not progress through to the Senior School, we may keep their contact so we can invite them to join the virtual alumnae community; RHSA Connect in the future. - **LI**.
37. The School must make sure that our computer network is working well and is secure. This may involve data about your child, for example, our anti-virus software might scan files containing data about your child - **LI**.
38. From time to time, we may use a third party to provide activities and/or support such as an external sports or drama coach, peripatetic music teacher or learning support assistant and we will share your child's data

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with them, in order to perform their role. We may also share your personal data with other third parties such as travel providers, accommodation providers or activity centres in order to appropriately manage residential trips and/or school exchanges but would look to do so with your consent for the proposed activity - **LI**, **PI**].

39. We can keep data about your child for a very long time or even indefinitely if we need this for historical, research or statistical purposes and to develop our school's archive to promote its history. - **LI**.

40. The School is a charity which means that, in exceptional circumstances, we may need to share your data with the Charity Commission which checks how we are behaving as a charity.

We will only share your child's data with other people and organisations when we have a good reason to do so. In exceptional circumstances we may need to share it more widely than we would normally.

To provide you with an education, we sometimes share your data with external educational companies, for example Doodle Maths.

We sometimes use contractors to handle personal data on our behalf. The following are examples:

- IT consultants who might access data about your child when checking the security of our IT network; and
- we use third party "cloud computing" services to store some data rather than the data being stored on hard drives located on the School site.

If you have any questions about the above, please speak our Compliance Officer by contacting them at privacy@redmaidshigh.co.uk

Criminal offence data

In exceptional circumstances, we may use data about criminal convictions or offences. We will only do this where the law allows us to. This will usually be where such processing is necessary to carry out our obligations, to exercise our rights or to look after our pupils.

More than one basis

As you will see from the information above, in some cases we will rely on more than one basis for a particular use of your child's data. In addition, we may move from one of the legal bases listed above to another as circumstances change. For example, as a safeguarding matter becomes more serious, we may start to rely on "legal obligation" to share personal data with the local authority in addition to the other legal bases which are noted for safeguarding purposes.

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Consent

We may ask for your consent to use your child's data in certain ways as an alternative to relying on any of the bases in the table above. For example, we may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on legitimate interests. If we ask for your consent to use your child's personal data you can take back this consent at any time.

Any use of your child's data before you withdraw your consent remains valid. Please speak to the Headteacher's PA if you would like to withdraw any consent given.

Sending data to other countries

We may send your child's data to countries which do not have the same level of protection for personal data as there is in the UK. For example, we may store your child's data on cloud computer storage based overseas.

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here:

https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en

If the country that we are sending your child's data to is not on the list, or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland), then it might not have the same level of protection for personal data as there is in the UK. Where appropriate we will put in place additional safeguards.

We will provide you with details about the safeguards which we have in place outside of this privacy notice. If you have any questions about the safeguards that are in place please contact the school's Compliance Officer.

N.B. This section is subject to change due to the BREXIT deal. It will be reviewed once further details are known.

For how long do we keep your child's data?

We keep your child's data for as long as we need to in order to educate and look after them. We will keep certain data after your child has left the School, for example, so that we can find out what happened if you make a complaint.

In exceptional circumstances we may keep your child's data for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

Please see our Information and Records Retention Policy for more detailed information. This can be found on our website here:

<https://www.redmaidshigh.co.uk/about-us-a-brief-history-school-policies.aspx>

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What decisions can you make about your child's data?

The Data Protection Act 2018 allows you to make various decisions about your child's rights. Your child's rights are as follows:

- **The right to be informed:** this privacy policy gives you clear information about how your data is used and what your rights are.
- **The right to rectification:** if data held by the School about your child is incorrect you can ask us to correct it.
- **The right of access:** you can also ask what data we hold about your child and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra data, such as why we use this data about your child, where it came from and what types of people we have sent it to.
- **The right to erasure:** you can ask us to delete the data that we hold about your child in certain circumstances. For example, where we no longer need the data.
- **The right to data portability:** you can request the transfer of your child's data to you or to a third party in a format that can be read by computer in certain circumstances.
- **The right to restrict processing:** our use of data about your child may be restricted to simply storing it in some cases. For example, if you tell us that the data is inaccurate we can only use it for limited purposes while we check its accuracy.
- **The right to object:** you may object to us using your child's data where:
 - we are using it for direct marketing purposes (e.g. to send your child the School magazine or prospectus for additional services;
 - the legal basis on which we are relying is either legitimate interests or performance of a task carried out in the public interest. Please see the section "Our legal bases for using your child's data" above;
 - we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of your class for historical reasons.

Rights in relation to automated decision making and profiling: this is when machines/software make decisions based on rules about someone. This is not a process that the School undertakes but it is important to know it is still your right.

The Compliance Officer can give you more information about your child's data protection rights.

Further information and guidance

This notice is to explain how we look after your child's personal data. The Compliance Officer can answer any questions which you might have.

Please speak to Compliance Officer if:

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- you would like to exercise any of your child's rights listed above; or
- you would like us to update the data we hold about your child; or
- you would prefer that certain data is kept confidential.

If you consider that we have not acted properly when using your child's personal data you can contact the Information Commissioner's Office: ico.org.uk.

Kate Doarks/Paul Dwyer/Lisa Brown/Richard Bacon April 2021
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