



# WATFORD GRAMMAR SCHOOL FOR GIRLS

Headmistress: Miss Sylvia Tai BA (Hons)

## PRIVACY NOTICE FOR PARENTS/CARERS OF PUPILS, POTENTIAL PUPILS AND PAST PUPILS

Watford Grammar School for Girls collects data and information about parents / carers of our pupils so that we can operate effectively as a school. This privacy notice explains how and why we collect parent / carer data, what we do with it and what rights parents have.

The term “parent” is widely defined in education law to include the natural or adoptive parents (regardless of whether parents are or were married, whether a father is named on a birth certificate or has parental responsibility for the pupil, with whom the pupil lives or whether the pupil has contact with that parent), and also includes non-parents who have parental responsibility for the pupil, or with whom the pupil lives. It is therefore possible for a pupil to have several “parents” for the purposes of education law. This privacy notice also covers other members of pupils’ families who we may process data about from time to time, including, for example, siblings, aunts and uncles and grandparents.

Watford Grammar School for Girls is an Academy Trust school, company number 07348254, registered office at Lady’s Close, Watford, WD18 0AE, registered as a company in England and Wales, and an exempt charity. We are well known for our rich academic curriculum, our strong and supportive pastoral care, and the wide range of extended activities that, taken as a whole, educate, encourage and empower our girls. The school motto is *Sperate Parati* - or ‘Go forward with preparation’ - which encapsulates our aim for every member of the school community.

We are proud of the strong academic traditions and the importance of service to others that have shaped the ethos of our school since its foundation by Elizabeth Fuller in 1704. We value hard work and nurture scholarship, always encouraging our girls to achieve excellence in all fields of study. The girls have the opportunity to excel at music, drama and sport, as well as to play an active role in the wider community by taking part in many charitable activities. Thus they learn to be their best selves: hard working, compassionate and high achieving in all areas of life.

We are a diverse and thriving community, founded on consideration, toleration and trust. Each girl is given opportunities to develop confidence and resilience both in and outside the classroom, and to develop a sense of personal responsibility that is best summarised in the maxim ‘I can do it, and I will do it’ - words which every member of the school learns and takes to heart.

As part of ensuring the effective running of our school it is essential that we hold and use data and information about parents/carers, pupils, staff, governors, and others with whom we have relationships. It is important to us that we do this professionally and in line with our statutory, moral and contractual obligations, and this notice is part of how we explain how we do this. Legally the school is a Data Controller under the Data Protection Act 2018 / the UK General Data Protection Regulation, and the responsible officer at the school is Michael Lewis who is Data Protection Officer.



## **Why do we collect and use parent / carer information?**

Under the UK General Data Protection Regulation (GDPR) / Data Protection Act 2018, the school as Data Controller must have a lawful basis (under Article 6 of the UK GDPR) for all its collection and use of data, and make that clear as part of this notice.

We collect and use parent / carer information under the following lawful bases:

- a. where we have the consent of the data subject;
- b. where it is necessary for compliance with a legal obligation;
- c. where processing is necessary to protect the vital interests of the data subject or another person;
- d. where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

We do not generally process personal data on the 'legitimate interests' basis allowed for under the UK GDPR. If we do ever do this, we will carry out a Legitimate Interests Assessment first in line with the requirements of the Information Commissioner's Office, and only use this basis should it be justified under that Assessment. See our Data Protection Policy for further information

Where the personal data we collect about parents / carers is sensitive personal data, we will only process it where lawful under Article 9 of the UK GDPR / Data Protection Act 2018, for example where:

- a. we have explicit consent;
- b. processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent; and / or
- c. processing is necessary for reasons of substantial public interest, on the basis of one of 23 specific substantial public interest conditions set out in Part 2 of Schedule 1 of the Data Protection Act 2018, which shall be proportionate to the aim pursued, where we respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Please see our Data Protection Policy for a definition of sensitive personal data.

We use the parent / carer data to support our functions of running a school, in particular:

- a. as part of the regular process of admissions decision-making for the school;
- b. to maintain a waiting list for admissions;
- c. to support pupil learning;



- d. to monitor and report on pupil progress;
- e. to provide appropriate pastoral care;
- f. to assess the quality of our services;
- g. to comply with the law regarding data sharing;
- h. for the protection and welfare of pupils and others in the school, including our safeguarding / child protection obligations;
- i. for the safe and orderly running of the school;
- j. to promote the school;
- k. to send you communications that may be of interest to you which may include information about school events or activities, news, campaigns, appeals, other fundraising activities;
- l. in order to respond to investigations from our regulators or to respond to complaints raised by our stakeholders;
- m. in connection with any legal proceedings threatened or commenced against the school.

**The categories of parent / carer information that we collect, hold and share include:**

- a. Personal information (such as name, address, previous addresses or other places where you reside or have resided, telephone number and email address);
- b. Information relating to your identity, marital status, employment status, religion, ethnicity, language, the type of tenure you have at your home address, medical conditions, nationality, country of birth and free school meal / pupil premium eligibility / entitlement to certain benefits, information about court or other orders in place affecting parenting arrangements for pupils and what those arrangements are in practice;
- c. Whether either parent of a child is employed by the school;
- d. Whether either parent of a child at the school is currently serving in the Armed Forces;
- e. Your contact details in case of emergency plus those of another person who may be contacted if you are not available;
- f. Your consent to any SEN or other individual arrangements made for your child as part of the normal workings of the school, and/or your consent (or withholding of consent) to data relating to your child being shared as part of the normal workings of the school;

From time to time and in certain circumstances, we might also process personal data about parents / carers, some of which might be sensitive personal data, information about criminal proceedings / convictions or information about child protection / safeguarding. This information is not routinely collected about parents / carers and is only likely to be processed by the school in specific circumstances relating to particular pupils, for example, if a child protection issue arises or if a parent / carer is involved in a criminal matter. Where appropriate, such information may be shared with external agencies such as the child protection team at the Local Authority, the Local Authority Designated Officer and / or the Police. Such information will only be processed to the extent that it is lawful to do so and appropriate measures will be taken to keep the data secure.



We collect information about parents / carers before pupils join the school and update it during pupils' time on the roll as and when new information is acquired.

## **Collecting parent / carer information**

Whilst the majority of information about parents / carers provided to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the UK General Data Protection Regulation, we will inform you whether you are required to provide certain parent / carer information to us or if you have a choice in this. Where appropriate, we will ask parents / carers for consent to process personal data where there is no other lawful basis for processing it, for example where we wish to ask your permission to use your information to keep in touch via Parentmail, to request voluntary contributions or charitable support, including via our connected organisation the Women of Vision Trust, and record how and when this consent is given. Parents / carers may withdraw consent given in these circumstances at any time.

## **CCTV**

The school also uses CCTV cameras around the school site for security purposes and for the protection of staff, pupils and others on site. CCTV footage may be referred to during the course of disciplinary procedures (for staff or pupils) or investigate other issues. CCTV footage involving parents / carers will only be processed to the extent that it is lawful to do so. Please see our CCTV policy for more details.

## **Storing parent / carer data**

A significant amount of personal data is stored electronically, for example we currently hold personal data on our School Information Management database, SIMS. Some information may also be stored in hard copy format.

Data stored electronically may be saved on a cloud based system which may be hosted in overseas, including outside of the UK. If this happens we will take steps to ensure the data is managed and protected as if it were covered by the same protections which apply in the UK.

Personal data may be transferred to other countries, including countries outside the UK, for specific essential purposes - if, for example, we are arranging a school trip overseas. Appropriate steps will be taken to keep the data secure.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, insurance or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. We do this in line with the best practice promoted by appropriate professional bodies, and currently follow the data retention guidelines in the Information and Records Management Society ([www.irms.org.uk](http://www.irms.org.uk)) Toolkit



for Schools. Further details of retention periods for different aspects of your personal information are available in our Data Retention Policy, and a copy of this can be obtained from the Data Protection Officer upon request.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a parent / carer we will retain and securely destroy your personal information in accordance with our Data Retention Policy. If you continue a relationship with the school in another capacity, for example a voluntary role, we will use your data as appropriate for that role.

### **Who do we share parent / carer information with?**

We routinely share parent / carer information with:

- schools that pupils attend after leaving us;
- The Women of Vision Trust, the charitable arm of the school, Charity No. 1069040
- Parentmail's service provider where we have the parent/carers consent to do so
- Any institution or organisation which requires parent contact details as part of a routine visit by school pupils, for example for emergency contact purposes

From time to time, we may also share parent / carer information other third parties including the following:

- our local authority, Hertfordshire County Council
- a pupil's home local authority (if different);
- the Department for Education (DfE);
- school governors / trustees;
- the Police and law enforcement agencies;
- NHS health professionals including the school nurse, educational psychologists, or other health professional who may be treating a pupil in an emergency
- Education Welfare Officers;
- Courts, if ordered to do so;
- the Teaching Regulation Authority;
- Prevent teams in accordance with the Prevent Duty on schools;
- other schools, for example, if we are negotiating a managed move and we have your consent to share information in these circumstances;
- music teachers if lessons are arranged via the school
- UCAS
- our legal advisors;
- our insurance providers.

Some of the organisations referred to above are joint data controllers. This means we are all responsible to you for how we process your data.

In the event that we share personal data about parents / carers with third parties, we will provide the minimum amount of personal data necessary to fulfil the purpose for which we are required to share the data.



## **Requesting access to your personal data**

Under data protection legislation, parents / carers have the right to request access to information about them that we hold ("Subject Access Request"). To make a request for your child's personal data, or be given access to your child's educational record, contact the Data Protection Officer, Michael Lewis, although any written request for personal data will be treated as a Subject Access Request.

The legal timescale for the School to respond to a Subject Access Request is one calendar month. As the School has limited staff resources outside of term time, we encourage parents / carers to submit Subject Access Requests during term time and to avoid sending a request during periods when the School is closed or is about to close for the holidays where possible. This will assist us in responding to your request as promptly as possible. For further information about how we handle Subject Access Requests, please see our Data Protection Policy.

## **No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

## **What we may need from you**

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of our data protection responsibilities.

## **RIGHT TO WITHDRAW CONSENT**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your



consent, please contact the Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

### **DATA PROTECTION OFFICER**

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO, Michael Lewis, at the school.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

### **CHANGES TO THIS PRIVACY NOTICE**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.