ASHFORD SCHOOL
Inspiring Minds

Pupil and Parent Privacy notice for Ashford School, a United Church Schools Trust School

This notice is intended to provide information about how the School will use or "process" personal data about individuals including current, past and prospective pupils (referred to in this notice as "pupils") and their parents, carers or guardians, and host families (referred to in this notice as "parents").

Responsibility for Data Protection

The Data Controller for personal information held by Ashford School is United Church Schools Trust (UCST). UCST is registered with the Information Commissioner's Office (ICO). The registration number is Z533407X.

The Company Secretary, is the Data Protection Officer (DPO) and, is responsible for ensuring that UCST complies with the Data Protection Law. The Company Secretary can be contacted on company.secretary@unitedlearning.org.uk or 01832 864538.

The Bursar, Susan Williams, is responsible for ensuring that the School complies with UCST's policies and procedures in relation to Data Protection. They can be contacted on 01233 625171 or williamss@ashfordschool.co.uk

Why we collect and use Personal Data about pupils and parents

Ashford School and United Church Schools Trust collect, create and hold personal information relating to our pupils and may also receive information about them from their previous school, local authority and/or the Department for Education (DfE). We also collect and hold personal information about our pupil's parents and carers. We use this personal data to:

- Provide education services (including SEN), career services and extra-curricular activities to pupils; and to monitor pupils' progress and educational needs;
- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care.
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils at the school.
- To maintain relationships with alumni and the school community.
- For the purposes of management planning and forecasting, research and statistical analysis and to enable UCST to monitor the School's performance.
- To monitor use of the School's IT systems in accordance with the school's acceptable use policy.
- To receive information about current and prospective pupils from any educational institution that they attended, including academic records, references and information relating to outstanding fees or payment history.
- For the purposes of pupil selection and to confirm the identity of prospective pupils and their parents.
- To make use of photographic images of pupils in school publications and on the school website in accordance with the School's policy on taking, storing and using images of children.
- To raise invoices and process payments in accordance with the school's terms and conditions.

- For security purposes, and for regulatory and legal purposes (for example child protection and health and safety) and to comply with its legal obligations.
- To receive reports from any external bodies who may be working with your child.
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the School.
- To comply with our obligation as a UK Visas and Immigration Licenced Sponsor to ensure that every pupil has permission to be in the UK.
- To keep you updated about the activities of the school including by sending updates and newsletters by email and post.
- To organise trips and visits both in the UK and abroad.
- The school will use this information to decide what level of bursary, if any, will be awarded.
- To determine the outcome of bursary applications.

The categories of personal data that we process

The types of personal data processed by the school will include:

1. Names, addresses, telephone numbers, email addresses and other contact details.
2. Academic records and national curriculum assessment results, including examination scripts and marks.
3. Attendance information, behavioural records, any exclusion information.
4. Child protection records (where applicable).
5. 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
6. Where pupils go after they leave the school.
7. For pupils enrolling for post 14 qualifications, the Learning Records Service will give us the unique learner number (ULN) and may also give us details about your learning or qualifications.
8. Images captured by the School's CCTV system (in accordance with the school's policy on taking, storing and using images of children.
9. Fee payers' bank details.
10. Passport and visa details (where applicable) or other evidence of the pupil's right to live in the UK.
11. In the case of bursary applications, we will receive an assessment from Bursary Applications Limited regarding your lifestyle and financial circumstances.
12. Personal characteristics such as your ethnic group, any special educational needs you may have and any relevant medical information.

The legal basis for the processing of pupil and parent data

The legal basis for processing the personal data listed in points 1-11 above are:

- to enable us to fulfil the terms of our contract with you.
- to comply with our legal obligations
- Where the processing is necessary for the purposes of UCST's legitimate interests.

Information relating to racial or ethnic origin, religious beliefs or health (point 11) will only be processed with the explicit consent of the pupil or the pupil's parents. Further information regarding the purposes for which these data would be processed will be provided with the data collection form.

Data Retention Periods

The pupil's educational record will move with the pupil to their next school. Where the school is the last school that the pupil attends the records will be kept until the pupil is 25 years old.

Admissions information will be retained for one year post successful admission or closure of appeal.

Information relating to financial transactions will be kept for 7 years.

For further information on how long we keep personal data for please refer to our records retention schedule which can be found here.

Data Security

ULT has in place technical and organisational measures that ensure a level of security appropriate to the sensitive nature of the personal data that we process. For further information regarding how we keep personal data secure please refer to our security of personal data policy here.

Data Processors

We use third party data processors to provide us with a variety of services [1]. This use of data processors will only take place if is in compliance with the UK GDPR and the Data Protection Act 2018 (and any subsequent legislation related to data protection in applicable jurisdictions).

Decisions on whether we contract with these third party processors are subject to a robust approval process and are based on a detailed assessment of the purpose for which the data processing is required, the level and sensitivity of data involved and the arrangements in place to store and handle the data. To be granted access to pupil level data, data processors must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and retention and use of the data.

We currently use the following data processors:

iSams, Microsoft Office 365, Wonde, Classroom Monitor, AirWatch, Altinet Barracuda, CiE, Fortigate, Gradeset, CHQ, Firefly, EduTrips, Sports Fixtures Pro, ThankQ, Hegarty Maths, Swimsoft, Memrise, Practice, Project Q Software, GL Assessment which includes CATS, NGRT and SWST, CEM which includes MidYIS, YELLIS and ALIS, E-Praise, Renaissance Learning - Accelerated Reading/Star ReadingJunior Librarian/Eclipse, Showbie, Rising Stars, Mail Chimp, CPOMS, 2Simple, Edurio.

Sharing Data with Third Parties (other data controllers)

We may share data with the following recipients:

Keeping in touch and supporting the School
We would like to share pupil and parent personal data with both our Parent Teacher Association, our Alumni Association. We will only do so if you have signed the appropriate consent form. Details of how these groups use your personal data are given on the consent form. Consent may be withdrawn at any time by writing to the Headmaster, Mr Michael M Hall. Headmaster@ashfordschool.co.uk

Careers Guidance
We currently share pupil personal data with University Colleges and Admissions Services (UCAS) and online career services Kudos, Centrigrade and Morrisby.

References
We will provide references and information regarding outstanding fees and payment history to any other educational institution that the pupil proposes to attend. We will provide references to potential employers of past pupils.

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School Inspections
On request we will share academic records with inspectors from the Independent Schools Inspectorate (ISI) and Ofsted.

Redwood Collections
When fees are unpaid we may share your contact details and fee payment history with Redwood Collections, our debt collection agency. We will write to you to inform you that we may do this prior to taking such action.

UK Visas and Immigration
UCST is a Tier 4 Immigration Sponsor. As such we may be required from time to time to share personal data with UK Visas and Immigration, when they carry out sponsor inspections or when they need to assess an individual's immigration status.

Department for Education
We are required, by law, to pass some information about our pupils to the Department for Education (DfE). This information will, in turn, then be made available for use by the Local Authority.

DfE may also share pupil level personal data that we supply to them, with third parties. This will only take place where legislation allows it to do so and it is in compliance with the Data Protection Act 2018 and the UK GDPR.

Decisions on whether DfE releases this personal data to third parties are subject to a robust approval process and are based on a detailed assessment of who is requesting the data, the purpose for which it is required, the level and sensitivity of data requested and the arrangements in place to store and handle the data. To be granted access to pupil level data, requestors must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and retention and use of the data.

For more information on how this sharing process works, please visit:
https://www.gov.uk/guidance/national-pupil-database-apply-for-a-data-extract

For information on which third party organisations (and for which project) pupil level data has been provided to, please visit: https://www.gov.uk/government/publications/national-pupil-database-requests-received

If you need more information about how our local authority and/or DfE collect and use your information, please visit:

- our local authority at www.ashford.gov.uk or
- the DfE website at https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

We will not give information about our pupils to any other third parties without your consent unless the law and our policies allow us to do so.

Rights of the Data Subject

Data protection legislation gives individuals certain rights which are detailed below. If you wish to exercise these rights please contact Susan Williams.

Right of access to personal data "subject access request"

You have the right to access the personal data that the school holds about you. Requests need to be made in writing. If your child is over the age of 12 they will also need to sign the request. We take the security of personal data seriously so we may ask you for proof of identity to verify that you are entitled to the information requested.

Right to withdraw consent

Where we have obtained your consent to specific processing activities you may withdraw this consent at any time.

Right to rectification

You have the right to have the personal data that we hold about you rectified if it is inaccurate or incomplete. We will respond to such requests within one month.

Right to erasure

You have the right to have personal data erased in certain specific circumstances. If you make such a request we will consider whether the right to erasure applies and give you a full and reasoned response.

Right to restrict processing

In certain circumstances you have the right to request that we restrict the processing of your personal data. If you make such a request we will consider whether the right to restrict processing applies and give you a full and reasoned response.

For further information regarding these rights please refer to the Group's rights of the data subject policy.

If you disagree with a decision that we have taken regarding the processing of your personal data please contact UCST's Company Secretary, Alison Hussain, on 01832 864538 or company.secretary@unitedlearning.org.uk.

You also have the right to lodge a complaint with the information Commissioners Office on 0303 123 1113 or https://ico.org.uk/for-the-public/ .