



GUILDFORD HIGH SCHOOL

4-24 PRIVACY NOTICE

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 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 Guildford High 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, Steve Whiffen, is responsible for ensuring that UCST complies with the General Data Protection Regulation (GDPR). He can be contacted on company.secretary@unitedlearning.org.uk or 01832 864538.

Guildford High School is responsible for ensuring that the School complies with UCST’s policies and procedures in relation to Data Protection. The person to contact is Rosana Vilaplana, MIS Manager, who can be contacted on 01483 561440 or via email rosana.vilaplana@guildfordhigh.co.uk

THE PURPOSES FOR WHICH WE PROCESS PUPIL AND PARENT PERSONAL DATA

Guildford High 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 through an annual Old Girls newsletter, termly school newsletters, email communication, social media and networking sites and organised school events.
- 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 and videos of pupils in school marketing (printed, online and offline) in accordance with the Child's Protection 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:

- Names, addresses, telephone numbers, email addresses and other contact details.
- Academic records and national curriculum assessment results, including examination scripts and marks.
- Attendance information, behavioural records, any exclusion information.
- Child protection records (where applicable).
- 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
- Where pupils go after they leave the school.
- For pupils enrolling, the Learning Records Service will give us the unique learner number (ULN) and may also give us details about your learning or qualifications.
- Images captured by the School's CCTV system (in accordance with the Child's Protection Policy on taking, storing and using images of children.
- Fee payers' bank details.
- Passport and visa details (where applicable) or other evidence of the pupil's right to live in the UK.
- In the case of bursary applications, we will carry out an assessment internally.
- Personal characteristics such as your ethnic group, any special educational needs you may have and any relevant medical information.
- Images and videos captured around school and at school events and trips by school staff and external photography agencies for marketing department use in accordance with the Child's Protection Policy on taking, storing and using images of children.

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 12) 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 6 years.

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 management and retention schedule Policy.

DATA SECURITY

GHS 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 IT and Data Security Policy.

DATA PROCESSORS

We use third party data processors to provide us with a management information system, accounts software, cloud storage services, apps and software for use in the classroom and to facilitate the secure transfer of data between the school and central office. This use of data processors will only take place if it is in compliance with the Data Protection Act 1998 and the General Data Protection Regulation.

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.

For the list of processors that we share data with, please refer to the Appendix- List of third party processors.

SHARING DATA WITH THIRD PARTIES (OTHER DATA CONTROLLERS)

We may share data with the following recipients:

Keeping in touch and supporting the School

Our Old Girls Association has a voluntary one off lifetime membership fee collected when your daughter joins the senior school.

We would like to share pupil and parent personal data with our Old Girls Association. We will only do so if you have signed the appropriate consent form. Details of how the Old Girls Association use your personal data are given on the consent form. Consent may be withdrawn at any time by writing to:

Old Girls Association	oldgirls@guildfordhigh.co.uk
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Our parents' association, The Friends of Guildford High School, has a voluntary annual subscription to become a member of FoGHS. The consent to collect this annual membership fee is obtained when your daughter first joins the school and this consent can be withdrawn at any time by writing to:

FoGHS Chair	FoGHS@guildfordhigh.co.uk
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Careers Guidance – we use the following services in our careers department:

https://www.morrisby.com	Option opportunity for all Year 10 to take the Morrisby profile
https://www.ucas.com/	Year 13 University applications

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.

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 1998 and the General Data Protection Regulation.

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 <https://www.surreycc.gov.uk/your-council/accessing-information-that-we-hold> 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 Rosana Vilaplana, MIS Manager, via email rosana.vilaplana@guildfordhigh.co.uk or on 01483 561440.

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, Steve Whiffen, 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/>

Version number:	1.0	Target Audience	Staff/Parent/Pupils
Date issued:	May 2018	Reason for version change:	GDPR
Scheduled reviewed:	May 2019	Name of owner/ author:	Duncan Peel

APPENDIX : LIST OF THIRD-PARTY PROCESSORS

We use third party data processors to provide us with a management information system, accounts software, cloud storage services, apps and software for use in the classroom and to facilitate the secure transfer of data between the school and central office. This use of data processors will only take place if it is in compliance with the General Data Protection Regulation.

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.

List of 3rd party processors:

MIS System	ISAMS
Cloud Storage	Office 365 – OneDrive
Software Providers	Clarion call Doodlemaths ePraise Heritage Ciqua Parents Evening System SchoolPost Calendar The Little Boxoffice myHomework ClickView Edmondo Foldr Line Up – Ticketing System Roombooking System SOCS Sports Website and SOCS Airwatch LightSpeed
iPad Provider	Albion Computers
Data Sharing tools	Wonde
Online and School Assessments	GL Assessment; CEM

Exam Boards	<p>Edexcel</p> <p>AQA</p> <p>OCR</p> <p>CIE</p> <p>WJEC</p>
Marketing	<p>Something Big</p> <p>Pelican Images</p> <p>Eagle Print Limited</p> <p>Apex Direct Mail</p> <p>Facebook</p> <p>YouTube</p> <p>School House Magazine</p> <p>Eagle Radio</p> <p>The Telegraph</p> <p>Dan Cook Photography</p> <p>Pret-a-Portrait</p> <p>Mazuri Design</p> <p>Finalsite (school website)</p> <p>Twitter</p> <p>Mail Chimp</p> <p>Reach Publishing Services Limited BBC</p> <p>Royal Grammar School</p>
Admissions	<p>RS Admissions</p> <p>AXA PPP Healthcare Scheme*</p>
Accounts	<p>Stripe</p> <p>Barclays</p> <p>Redwood Collections</p> <p>Marsh Limited**</p>
HR	<p>Bonds</p>
Other	<p>ISI</p> <p>UK Visas and Immigration</p> <p>Department for Education</p>

	Guildford County Council
Trips and Activities	Duke of Edinburgh

*If you choose to take out medical insurance through the school the application forms will be sent to AXA PPP to enable them to administer the medical insurance scheme.

**If you choose to participate in the voluntary insurance schemes and fees refund scheme, you will be asked to complete application forms. These forms will be provided to our insurance broker, Marsh Ltd for the purposes of administering the scheme.