



PRIVACY NOTICE FOR PUPILS

St John's School GDPR Privacy Notice For Pupils

The General Data Protection Regulation 2018 protects an individual's rights in respect of their information. The following rights exist for individuals:

- Right to be informed how data is used by the School. (As set out below in this Privacy notice).
- Right of access to personal data held by the School.
- Right of rectification where personal data can be rectified if it is inaccurate or incomplete.
- Right of erasure also known as the "right of erasure" is to enable an individual to request the deletion or removal of personal data where there is no compelling reason for its continued processing.
- Right to restrict processing in order to 'block' or suppress processing of personal data in certain circumstances eg where the data is inaccurate or the processing was unlawful, so that particular data is merely held but not processed.
- Right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services.
- Right to object to processing based on legitimate interests, direct marketing or processing for purposes of scientific/historical research and statistics.
- Right to object to decisions made automated individual decision-making (making a decision solely by automated means without any human involvement).

St John's School holds and processed significant amounts of "personal data" about members of the school community. Under the Act, the school must process such personal data "fairly".

The School's Information Commissioner's Office registration number is Z8356081 and its registered address is **St John's School**. The School Address is Potter Street Hill, Northwood, Middlesex, HA6 3QY

Whilst **St John's School** is the Data Controller for the school, the School has appointed the Deputy Head (Pastoral) to endeavour to ensure that all personal data is processed in compliance with this policy and the Regulation. In the event if queries arise, the Deputy Head (Pastoral) may be contacted at the School via email: jsavage@st-johns.org.uk or telephone, 0208 866 0067 or via written communication sent to the Deputy Head (Pastoral) at the School postal address.



The school will use (and where appropriate share with third parties) and process personal pupil data about individuals for a number of purposes as part of its “legitimate interest” operations, including as follows:

- names, addresses, telephone numbers, e-mail addresses and other contact details; 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;
- images of pupils (and occasionally other individuals) engaging in school activities, and images captured by the school's CCTV system (in accordance with the school's policy on taking, storing and using images of children);

Occasionally, the school will need to share personal information relating to its community with third parties, such as professional advisers (eg health care professionals, psychologists, counsellors, lawyers and accountants) or relevant authorities (eg police or the local authority).

The School also has to complete surveys issued by organisations to which it is affiliated to including the Department for Education, the Independent Schools Council, the Independent Schools Bursars' Association and the Large Independent Day Schools group. Much of the information supplied to these groups is anonymous in character.

For the most part, personal data collected by the school will remain within the school, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis).

Once pupils leave St John's, the School has to retain securely all past pupils personal data connected with for example admissions, academic progress within the School, examination results and medical records until they reach the age of 25. Records associated with former pupils who had Special Education needs must be retained until they reach the age of 35. Records that specifically relate to pupil health issues or accidents that happened while the pupil was engaging in educational activity under supervision of a School member of staff or a contracted employee may need to be retained indefinitely.

Everyone responsible for using the personal data of others at St John's School has to follow strict rules called 'data protection principles'. They must make sure the information is:

- used fairly and lawfully.
- used for limited, specifically stated purposes.
- used in a way that is adequate, relevant and not excessive.
- accurate.
- kept for no longer than is absolutely necessary.



- handled according to people's data protection rights.
- kept safe and secure.
- not transferred outside the UK without adequate protection.

Where pupils (or parents on behalf of the pupils) have been given their data to the School under the legal basis of "consent", this consent may be withdrawn from the School in writing to the Deputy Head (Pastoral). Examples of this could include information about ethnicity or religious tradition or the use of photographs or video footage taken by the School or its employees of a pupil engaging in educational activity where the pupil is the predominant focus of the activity.

Pupils should be reminded that the School retains photographs of its pupils for the daily running of the School under the "legitimate interest" legal criteria. Moreover, there will be some circumstances in which it will not be practical to withdraw the use of a pupil image once it has been published eg in school publications.

The school has a statutory obligation to establish nationality and hence the right of residency of its pupils.

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 13 or over are generally assumed to have this level of maturity. 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 behalf.

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 procedure and should also notify the Deputy Head (Pastoral). An individual can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Tel (01626) 545 700. However, the ICO recommends that steps are taken to resolve the matter with the school before involving the regulator.

The school will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable. Further details on personal data protection can be obtained in the School's Privacy Notice.

Date for Review July 2022