



CANBURY SCHOOL

Privacy Notice for parents and guardians of children at the school or applying to join the school

The EU General Data Protection Regulation (GDPR) includes rules on giving privacy information to those whose data is held by an organisation (data subjects). These are more detailed and specific than in the Data Protection Act (DPA) and place an emphasis on making privacy notices understandable and accessible. Data controllers are expected to take ‘appropriate measures’ to ensure that this is the case. The school interprets this as using very clear language to outline each of the responsibilities for each of the data subject groups.

The GDPR say that the information provided to data subjects about how the school processes their personal data must be:

- concise, transparent, intelligible and easily accessible;
- written in clear and plain language, particularly if addressed to a child; and
- free of charge.

These requirements are about ensuring that privacy information is clear and understandable for data subjects. This privacy notice deals with the overall privacy responsibilities of the school.

This privacy notice deals with two sources of data, that obtained directly from the subject and data not obtained directly from the subject. The School’s privacy officer, who is responsible for the processing of data, is the Bursar. Please contact her via the School Office if you have any queries or concerns about the way your data or that of your child is collected, handled or processed.

The italicised paragraphs in red refer to guidance from the ICO on the compilation of privacy notices.

(The privacy notice should be provided at the time the data was obtained, if it was obtained directly from the data subject.)

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

(The purpose of the processing and the legal basis for processing must be clearly stated and the categories of personal data held must be clearly stated.)

Data will be processed for the purposes of responding to requests for information about joining the school and the school will therefore have a “legitimate interest” for processing basic personal data and sensitive personal data. The data the school holds will be the minimum it requires to form and maintain the contract between you and the school.

(Any recipient or categories of recipient must be clear and it should also be clear if data transfer to other countries and the safeguards in place.)

The school will share your data with the following companies who have contracts with the school and who have equalled the school’s precautions and systems for dealing with data. These include:

- Educational services (including on-line) providers
- Photographer
- Health care service providers
- Local Authorities
- IT Contractor(s)

- IT software providers
- Consultants engaged by the School
- External specialist teachers/therapists

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the school organises; should this be envisaged for your child, you will be contacted for your consent, the consent will be limited in time and content if it be required.

(The retention period for the data or the criteria used to determine the retention period.)

Please refer to the School's Data Retention Policy.

(The existence of each data subject's rights. The right to withdraw consent at any time.)

You have the right to withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.

(The right to lodge a complaint at any time with a supervisory authority.)

You can complain at any time about how the school has handled your data: the Information Commissioner is available as follows:

ICO helpline is 0303 123 1113.

(Where data is not obtained directly, the source from which it was obtained and whether or not it is a publicly available source.)

(For data obtained indirectly, the privacy notice should be provided within a one month (referred to as a reasonable period of time), when the first communication takes place with an individual, or if disclosure is envisaged to another recipient, at the latest, before the information is disclosed.)

We will obtain the data the school requires from you. Should we need data from other sources we will contact you within a month.

(Whether the provision of personal data is part of a statutory or contractual requirement or obligation and the possible consequences of failing to provide the personal data.)

We see the provision of personal data as necessary to properly admit your child to the school and to administer, and for the school to fulfil its obligations under the contract, once your child is a pupil here.

(The existence of automated decision making including profiling and the information about how decisions are made, the significance and the consequences.)

There is no automated decision making or profiling involved in this data stream into and through the school.

15 May 2018