Pupil and Parent Privacy notice

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This notice is intended to provide information about how Embley 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 (referred to in this notice as "parents").

1. Responsibility for Data Protection

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

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

1.3. Embley's Data Manager is responsible for ensuring that the school complies with UCST's policies and procedures in relation to Data Protection. They can be contacted on Lisa.Johnson@embley.org.uk

2. Why we collect and use Personal Data about pupils and parents

2.1. Embley 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. 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 images of pupils in print and digital communications, and for promotion and marketing, 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 the school's legal obligations.
- To receive reports from any external bodies who may be working with a 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 & Immigration (UKVI) sponsor licence holder to ensure that every pupil has permission to live and study in the UK.
- To keep parents updated about the activities of the school including sending updates and newsletters by email and post.
- To organise study trips and visits both in the UK and abroad.
- To determine the outcome of bursary applications.

3. The categories of personal data that we process

3.1. 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 pupil's learning or qualifications.
8. Images captured by the school's CCTV and ANPR systems in accordance with the CCTV policy.
9. Still and moving images in accordance with the image use policy.
10. Fee payers' bank details.
11. Passport and visa (where applicable) details or other evidence of the pupil's right to live and study in the UK.
12. In the case of bursary applications, we will receive an assessment from Bursary Applications Limited regarding parents' lifestyle and financial circumstances.
13. Personal characteristics such as the pupil's ethnic group, any additional educational needs they may have and any relevant medical information.

4. The legal basis for the processing of pupil and parent data

4.1. 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 parents;
- to comply with our legal obligations; and
- where the processing is necessary for the purposes of Embley and/or UCST's legitimate interests.

4.2. Information relating to 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.

5. Data Retention Periods

5.1. 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.

5.2. Information relating to financial transactions will be kept for seven years.

5.3. For further information on how long we keep personal data, please refer to our Records Retention Schedule in policies section of the Embley website.

6. Data Security

6.1. Embley and UCTS have 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 the United Learning Security of Personal Data Policy in policies section of the Embley website.

7. Data Processors

7.1. We use third party data processors to provide us with 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 United Learning. This use of data processors will only take place in compliance with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

7.2. 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.

7.3. A list of the data processors currently used by Embley is available in Appendix A.

8. Sharing Data with Third Parties (other data controllers)

8.1. We may share data with the following recipients:

Keeping in touch and supporting the school
We share parent contact details with our Embley Parents' Association only if parents have given consent. 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 admissons@embley.org.uk

Careers Guidance
Information relating to careers guidance will be held securely in UniFrog under the pupil's individual record.

Examination Boards
We will provide information to relevant examination boards and the Joint Council for Qualifications (JCQ) in relation to any external examinations taken. The Examination Board will retain a copy of the data we share with them to maintain a permanent record of results achieved. The examination boards routinely used at Embley include AQA, Cambridge International, Edexcel, OCR, WJEC, ABRSM and Trinity College London.

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.

Insurance
If you choose to participate in the voluntary fees refund scheme, you will be asked to complete applications forms provided by our insurance broker, Marsh Ltd, for the purpose of administering the scheme. In the event of a claim, we will provide information direct to Marsh Ltd. If you choose to take out medical insurance through the school, you apply online direct with AXA PPP to enable them to administer the medical insurance scheme.

The school uses Zurich Municipal to administer our travel insurance for school trips. In the event of a claim, we will provide relevant information to Zurich Municipal in relation to this and you may be asked to provide documentary evidence as appropriate. Our iPad insurance is administered by Summit Insurance Services Ltd, trading as Compucover through our iPad leasing scheme provided by Albion Computers Plc. In the event of a lost or damaged iPad, we will provide the relevant pupil's name in relation to any claim submitted.

School Photographer(s)
We arrange a photographer who will take individual photographs of any pupils as instructed by us. The photographer will supply the school with a digital copy of the image to upload to our MIS to be used for identification purposes and will retain copies of the images for sale in accordance with their own policies and procedures.

We arrange for a photographer to take sibling and class photos.

We use several other professional photographers to capture images for marketing purposes throughout the school year.

Where necessary, photos or video recordings may be taken as an integral part of a project, assignment, coursework module or as evidence of educational achievement. In addition, photos and video recordings are also a way for us to celebrate success, document school life for current and prospective parents and to raise our profile. Parents and families and the children themselves often enjoy seeing their loved ones in print or on our website.

We will only use students photos for marketing or social media purposes if parents have signed the appropriate consent form.

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 prior to taking such action.

UK Visas & Immigration
Embley is a UK Visa & Immigration (UKVI) student sponsor licence holder. As such, we may be

required from time to time to share personal data with UKVI, when they carry out sponsor inspections or when they need to assess a pupil's immigration status.

Department for Education
We are required by law to pass some information about 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 complies 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 https://www.hants.gov.uk/; or
- the DfE website at https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

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

9. Rights of the Data Subject

9.1. Data protection legislation gives individuals certain rights which are detailed below. If you wish to exercise these rights, please contact Lisa.Johnson@embley.org.uk

Right of access to personal data 'subject access request'
Parents have the right to access the personal data that the school holds about them. Requests need to be made in writing. If a pupil 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 parents for proof of identity to verify that they are entitled to the information requested.

Right to withdraw consent
Where we have obtained parent consent to specific processing activities, they 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.

9.2. For further information regarding these rights, please refer to the United Learning Rights of the Data Subject Policy.

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

9.4. 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/.

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10. Appendix A – List of Data Processors engaged by Embley

Apple School Manager
Atom
Bursary Applications Limited
Canva for Education
CEM Centre
Classroom Cloud
Cursor
CCTV – Alnet CMS4
CPOMS
Digital Theatre
DofE
D&D
Edshed
Educake
Elemental
Eventbrite
First News
Freshdesk
Focus on Sound Pro
GL Assessment
GradFinale Yearbooks
Groupcall
Gillman & Soame
Harper Collins
Hodder Education (Boost/Mark)
Hubspot
HubGem
iSAMS
Jamf
Kids Club App
Kerboodle
LeapFrog IM
MailChimp
MS 365
My School Portal
National Team Photographers
Parenta
Pupilprogress
Read Write Inc
Salamander
School Bus Tracker
Seneca
Securly
Showbie
Sign in app
Steer
Sparx Learning
SportsSmart – Podium Analysis
SOCs
SumpUp
TES School Cloud – Parents Evening System
Ticket Tailor
UCAS
Unifrog
Up Learn
UBIQ Education
Westminster
Wellbeing Hub
Wonde