



## How we use your information: Privacy Notice for Parents and Pupils

### What is the purpose of this document?

This notice is to help you understand **how** and **why** we (Edinburgh Steiner School) collect personal information about you and your child, **what** we do with that information used and **how long** it will be retained for. It also explains the decisions that you can make about your own information.

It provides you with certain information that must be provided under the General Data Protection Regulation (GDPR).

We are giving you this notice because you are able to exercise your child's data protection rights on their behalf. When your child reaches the age of 12 they are considered mature enough to exercise their own data protection rights.

If you have any questions about this notice, please contact Nick Brett by emailing: [dataprotection@edinburghsteinerschool.org.uk](mailto:dataprotection@edinburghsteinerschool.org.uk)

### What is personal information?

Personal information is information that identifies you (or your child) as an individual and relates to you (or your child).

The school will collect, store, and use the following categories of personal information about you:

- **For parents/guardians:**

Contact details, next of kin and financial information.

Information about family circumstances.

- **For pupils:**

Contact details, next of kin, date of birth, gender, educational and developmental history, behaviour records, preferences and interests.

Information about your health, including any medical conditions, health and sickness records, attendance and absence information.

Information about any special educational needs.

CCTV, photos and video recordings.

- **For both parents/guardians and prospective pupils:**

Any information you provide to us during an interview and subsequently that is for legitimate use within the school.

## Our legal grounds for using your information

This section contains information about the legal basis that we are relying on when handling your information.

**Legitimate interests:** This means that the processing is necessary for legitimate interests except where the processing is unfair to you. The School relies on legitimate interests for most of the ways in which it uses your information.

Specifically, the School has a legitimate interest in:

- Providing educational services to your child;
- Safeguarding and promoting the welfare of your child (and other children);
- Promoting the objects and interests of the School. This includes fundraising. It also includes making sure that we are able to enforce our rights against you, for example, so that we can contact you if unpaid school fees are due;
- Facilitating the efficient operation of the School; and
- Ensuring that all relevant legal obligations of the School are complied with.

In addition your personal information may be processed for the legitimate interests of others. For example, another school will have a legitimate interest in knowing if you have not paid School fees that are due to us.

If you object to us using your information where we are relying on our legitimate interests as explained above please speak to Nick Brett.

**Necessary for a contract:** We will need to use your information in order to perform our obligations under our contract with you. For example, we need your name and contact details so that we can update you on your child's progress and so that we can contact you if there is a concern.

**Legal obligation:** Where the School needs to use your information in order to comply with a legal obligation, for example to report a concern to Children's Services. We may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

**Vital interests:** For example, to prevent someone from being seriously harmed or killed.

**Public interest:** The School considers that it is acting in the public interest when providing education.

For **special categories of personal information** (e.g. race, ethnicity, health, religion), the School will also meet one of the special category conditions for processing which are set out under Article 9 of the GDPR.

## How and why does the School collect personal information

We obtain information about you and your child from admissions forms and from your child's previous school. We get information from your child, his/her teachers and other pupils. Information is also received directly from you via telephone calls, Skype calls and messaging, voicemails, face-to-face and by letter/email. For example, you might email us with information about your marital status or provide us with documents such as court orders.

Sometimes we may also get information from professionals such as doctors and from local authorities where we need this to look after your child.

We collect this information to safeguard and promote the welfare of your child, promote the objects and interests of the School, facilitate the efficient operation of the School and ensure that all relevant legal obligations of the School are complied with.

Here are some examples:

- We contact parents or guardians by telephone where necessary and particularly in the event of an emergency.
- We may send you information by email and post to keep you up to date with what is happening at the School. For example, by sending you information about academic information, parents' evenings, trips, events and activities taking place (including fundraising events), and the School newsletter (known as 'Tuesday Notice') if consent has been provided.
- We may need information about any court orders or criminal petitions which relate to you. This is so that we can safeguard the welfare and wellbeing of your child and the other pupils at the School.
- We may take photographs or videos of your child at School events to use on newsletters, internal and external publications, school displays, social media, on the School website and those of affiliated partners, if consent has been provided. This is to show prospective parents and pupils what we do here and to advertise the School. We may continue to use these photographs and videos after your child has left the School.
- We may take photographs or videos of your child to use for educational purposes.
- We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as toilets.
- We may use information about you if we need this for historical research purposes or for statistical purposes.
- We will process financial information about you in relation to the payment of fees and assessing bursary applications. In some cases we get information about you from third parties such as from your child's previous schools.

Edinburgh Steiner School will comply with data protection law and principles, which means that your data will be used lawfully, fairly and in a transparent way for relevant and legitimate purposes we have told you about and limited only to those purposes. The school undertakes to keep this information secure, accurate and up to date and only kept for as long as is necessary.

### **Sharing personal information with third parties**

The school routinely shares pupils' information, accordance with our legal and regulatory obligations, with the following bodies:

- Local authorities;
- NHS Scotland;
- Education Scotland;
- Schools that pupils attend after leaving us.

We also share information with appropriate third parties, including:

- The pupil's family and representatives;
- Other parents within your child's class (applies to parent/child names and parent's email only, to facilitate communication within the class, and only if explicit consent has been given);
- Examining bodies;
- The pupil's leaving destination (e.g. UCAS and further education bodies) and prospective employers;
- Edinburgh Council (e.g. regarding pupils in receipt of Educational Maintenance Allowance);

- The police (e.g. where a pupil is at risk of being exploited, trafficked or are considered missing);
- Our auditors and legal advisers;
- Travel agents, airlines, ferry companies, and accommodation venues (e.g. to make arrangements for school trips);
- UK Visas and Immigration (e.g. to comply with our duties as a Tier 4 sponsor, if your child is not of British nationality);
- Our insurance company (e.g. if there is a serious incident at the School or on a school trip);
- External advertisers, printing companies and affiliated partners;
- The School photographer (who takes class photographs of all pupils in the Summer term);
- The School Doctor.

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

### **Sending information to other countries**

We may send your information to other countries:

- Where we store information on computer servers based overseas, which might happen if we using software that is based within other countries, such as Google Drive and Mailchimp (for which we provide an e-mail address and contact name only). We will ensure that appropriate security and protection is in place for any piece of software that we use and we will get your consent before we share any data.
- Where we communicate with you or your child when you are overseas (for example, during the summer holidays if you live in a different country);
- When we are arranging international school trips. You will be contacted for your consent in this case and it will be limited to the duration of the trip.

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here:

[http://ec.europa.eu/justice/data-protection/internationaltransfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/internationaltransfers/adequacy/index_en.htm)

If the country that we are sending your information to is not on the list or, is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland) then it might not have the same level of protection for personal information as there is the UK.

### **Data security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to employees on a need-to-know basis. They will only process your personal information on our instructions and are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Details of these measures and procedures may be obtained from Nick Brett.

### **For how long do we keep your information?**

**Applying for a place:** We will hold your personal information for six months after we have informed you of our decision about whether to offer admission to the prospective pupil.

After this period, we will securely destroy your personal information in accordance with our data retention policy.

**Enrolled pupils:** We keep your information for as long as we need to in order to educate and look after your child. Retention periods depend on the type of information. For example, we will keep some information after your child has left the School, up to their 25<sup>th</sup> birthday.

After this period, we will securely destroy your personal information in accordance with our data retention policy.

We are keen to use information for historical, research or statistical purposes, however where possible we will anonymise the data. If we are going to use any personal information about you or a pupil, then we will seek your consent or the consent of the child. We are keen to ensure that there is an accurate historical record of attendance at the School and that information may be used for historical or to inform any alumni group that we may set up.

## **Your rights in relation to your information**

Under Data Protection law, individuals have a right to:

- **Request access** to a copy of the personal information we hold about you/your child;
- **Object to processing** of personal data that is likely to cause, or is causing, damage or distress;
- **Prevent processing for direct marketing;**
- **Object to decisions being taken by automated means.** At this School you will not be subject to decisions that will have a significant impact on you based solely on automated decision-making;
- In certain circumstances, have inaccurate personal data **corrected, blocked, erased or destroyed;**
- **Claim compensation** for damages caused by a breach of the Data Protection regulations.

If you would like us to change or update the information we hold about you, please contact the School office.

To exercise any other rights, please contact [dataprotection@edinburghsteinerschool.org.uk](mailto:dataprotection@edinburghsteinerschool.org.uk).

## **Right to withdraw consent**

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.

For example, if you would prefer for your child not to have their photo or video used for publicity, please indicate this on the parental consent form provided on admission.

Any use of your information before you withdraw your consent remains valid.

## **Further information and guidance**

We may amend this privacy notice from time to time. Any significant changes to this Notice or to the way we treat your data will be communicated via the School website or by contacting you directly.

If you have any questions about how we handle your personal information, or you would like to withdraw any consent given, please email Nick Brett: [dataprotection@edinburghsteinerschool.org.uk](mailto:dataprotection@edinburghsteinerschool.org.uk).

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues: [www.ico.org.uk](http://www.ico.org.uk).