**GATEHOUSE SCHOOL DATA PROTECTION POLICY**

### THIS POLICY

* This policy 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 (referred to in this policy as "parents").
* It applies in addition to the school's terms and conditions, and any other information the school may provide about a particular use of personal data, including e.g. the school's policy on taking, storing and using images of children.
* Anyone who works for, or acts on behalf of, the school (including staff, volunteers, governors and service providers) should also be aware of and comply with the school's data protection policy for staff, which also provides further information about how personal data about those individuals will be used.

### RESPONSIBILITY FOR DATA PROTECTION

* In accordance with the Data Protection Act 1998 ('the Act'), the school has notified the Information Commissioner's Office of its processing activities. The school's ICO registration number is Z1140259 and its registered address is Gatehouse Educational Trust Ltd., Sewardstone Road, London E2 9JG.
* The School has appointed the Bursar as Data Protection Officer ("DPO") who will endeavour to ensure that all personal data is processed in compliance with this policy and the Act.

### TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

* The school may process a wide range of personal data about individuals including current, past and prospective pupils and their parents as part of its operation, including by way of example:
	+ names, addresses, telephone numbers, e-mail addresses and other contact details;
	+ bank details and other financial information, e.g. about parents who pay fees to the school;
	+ past, present and prospective 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; and
	+ 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);
	+ Biometric finger print data for the sole purpose of maintaining library record software –special conditions relate to the processing of biometric data, please see Appendix A of this policy.
	+ Generally, the school receives personal data from the individual directly (or, in the case of pupils, from parents). However in some cases personal data may be supplied by third parties (for example another school, or other professionals or authorities working with that individual), or collected from publicly available resources.
	+ The school may, from time to time, need to process "sensitive personal data" regarding individuals.  Sensitive personal data includes information about an individual's physical or mental health, race or ethnic origin, political or religious beliefs, sex life, trade union membership or criminal records and proceedings.  Sensitive personal data is entitled to special protection under the Act, and will only be processed by the school with the explicit consent of the appropriate individual, or as otherwise permitted by the Act.

### USE OF PERSONAL DATA BY THE SCHOOL

* The school will use (and where appropriate share with third parties) personal data about individuals for a number of purposes as part of its operations, including as follows:
	+ For the purposes of pupil registration and to confirm the identity of prospective pupils and their parents;
	+ To provide education services (including SEN) and extra-curricular activities to pupils; monitoring pupils' progress and educational needs; and maintaining relationships with the school community;
	+ To share pupil and parent data with peripatetic music teachers (who are under contract to the school) to facilitate the provision of individual music lessons.
	+ For the purposes of management planning and forecasting, research and statistical analysis, and to enable the relevant authorities to monitor the school's performance;
	+ To give and receive information and references about past, current and prospective pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend;
	+ To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the school;
	+ To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so, for example for medical advice, insurance purposes or to organisers of school trips;
	+ To monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's IT: acceptable use policy;
	+ To make use of photographic images of pupils in school publications, on the school website in accordance with the school's policy on taking, storing and using images of children;
	+ For security purposes, and for regulatory and legal purposes (for example child protection and health and safety) and to comply with its legal obligations; and
	+ Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

### KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

* The school will use the contact details of parents and other members of the school community to keep them updated about the activities of the school, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the school may also contact parents by post and email in order to provide information about holiday clubs run by third party organisations and to promote the school’s Parents Association and, where appropriate, other worthy causes;

### RIGHTS OF ACCESS TO PERSONAL DATA ("SUBJECT ACCESS REQUEST")

* Individuals have the right under the Data Protection Act access to personal data about them held by the school, subject to certain exemptions and limitations set out in the Act.  Any individual wishing to access their personal data should put their request in writing to the Data Protection Officer.
* The school will endeavour to respond to any such written requests (known as "subject access requests") as soon as is reasonably practicable and in any event within statutory time-limits. The school may charge an administration fee of up to £10 for providing this information.
* You should be aware that certain data is exempt from the right of access under the Act. This may include information which identifies other individuals, or information which is subject to legal professional privilege. The school is also not required to disclose any pupil examination scripts (though examiners' comments may fall to be disclosed), nor any reference given by the school for the purposes of the education, training or employment of any individual.
* Children 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. Ex-pupils aged 12 or over are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested. All subject access requests from children 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 pupils. A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

### WHOSE RIGHTS

* The rights under the Act belong to the individual to whom the data relates. However, the school will in most cases rely on parental consent to process personal data relating to pupils (if consent is required under the Act) unless, given the nature of the processing in question, and the pupil's age and understanding, it is more appropriate to rely on the pupil's consent. Parents should be aware that in such situations they may not be consulted.
* In general, the school will assume that pupils consent to disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare, unless, in the school's opinion, there is a good reason to do otherwise.
* However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the school will maintain confidentiality unless, in the school's opinion, there is a good reason to do otherwise; for example where the school believes disclosure will be in the best interests of the pupil or other pupils.
* Pupils and parents are required to respect the personal data and privacy of others, and to comply with relevant school policies which are published on the school website.

### DATA ACCURACY AND SECURITY

* The school will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible.  Individuals must notify the school of any changes to information held about them.
* An individual has the right to request that inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under the Act) and may do so by contacting the Bursar in writing.
* The school will take appropriate technical and organisational steps to ensure the security of personal data about individuals. All staff will be made aware of this policy and their duties under the Act.

### QUERIES AND COMPLAINTS

* Any comments or queries on this policy should be directed to the Data Protection Officer either by email: bursar@gatehouseschool.co.uk or telephone 020 8709 5222.
* If an individual believes that the school has not complied with this policy or acted otherwise than in accordance with the Act, they should, in the first instance, discuss their concerns with the Head. If the matter remains unresolved, the school’s complaints procedure can be followed and the Data Protection Officer should be notified.

### APPENDIX A - PUPIL BIOMETRIC INFORMATION

At Gatehouse School we strive to make the lives of our pupils easier by enabling quick and easy access to our School Library through the use of library record software.  To this end, as a school, we collect, store and process pupils' biometric data in the form of fingerprints for the purpose of speeding up book issue in the library. At present fingerprint data is only collected for pupils in Year 1 and above.

Gatehouse School takes the collection and storage of all pupil data very seriously, and abides by the principles of The Data Protection Act 1998 and The Protection of Freedoms Act 2012.  We store all pupil biometric data securely for the purposes of identification only. Pupil biometric data is only processed for the purpose for which it was obtained, and which has been notified to pupils' parents or legal guardians, and it is not unlawfully disclosed to third parties.

In accordance with The Protection of Freedoms Act 2012, we notify every pupil's parents and/or legal guardian(s) of our practice of collecting and processing pupils' biometric data as part of an automated biometric recognition system, and obtain written parental consent to that use from at least one parent or legal guardian. Parents may withdraw their consent in writing at any time. Pupils may also opt out of the use of their own biometric information at any time.

Notification sent to parents and/or legal guardians informs them fully of the school’s reasons for collecting and processing pupils' biometric data and includes full details of the biometric data to be collected, its intended use, and parents' and pupils' right to opt out of the school's biometric recognition system. Those who opt out will be provided with details of alternative arrangements to access the relevant school services.

The automated recognition software which we use for the purposes of processing biometric data turns the pupil's fingerprint into a mathematical algorithm. The image of the finger print itself is then deleted meaning that the information which is stored cannot be used to recreate the original image of the fingerprint .

Pupil biometric data will be deleted when the pupil leaves the school, or if for some other reason he/she ceases to use the biometric system.

If parents or pupils have any questions about the school's collection and use of biometric information, they are welcome to contact the school's nominated Data Protection Officer (the Bursar).

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|  |  | **Next Review** | **June 2017** |
| **Circulation** | **All staff.** | **School Website** |  |