



Privacy Policy

Approved by:	Board of Governors
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Last reviewed on:	May 2024
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Next review due by:	May 2025
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How we use student information

Rugby High School is a registered charity. Our official name is Rugby High School Academy Trust. We take our responsibilities as a data controller seriously and are committed to using the personal data we hold in accordance with the law.

This privacy notice provides detailed information about how we process personal data.

The categories of student information that we process include:

- personal identifiers and contacts (such as name, unique student number, contact details and address)
- characteristics (such as ethnicity, language, and free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- special educational needs (including the needs and ranking)
- medical and administration (such as doctors' information, child health, dental health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (such as key stage 2, 4 and 5 results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- biometric data (in the form of fingerprints for cashless catering).

Why we collect and use student information

We collect and use student information, for the following purposes:

- to support student learning
- to monitor and report on student attainment progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to keep children safe (food allergies, or emergency contact details)
- to meet the statutory duties placed upon us for DfE data collections
- to provide catering services
- to organise trips and visits across the UK and overseas.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing student information are:

- to support student learning
- to monitor and report on student attainment progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to keep children safe (food allergies, or emergency contact details)
- to meet the statutory duties placed upon us for DfE data collections in accordance with the legal basis of public task and
- to provide catering services to organise trips and visits across the UK and overseas in accordance with consent.

In addition, concerning any special category data we also rely on the legal basis of the student's vital interests and public interest in the form of aggregate data.

How we collect student information

We collect student information via registration forms at the start of the school year or Common Transfer File (CTF) or secure file transfer from previous school.

Student data is essential for the school's operational use. Whilst the majority of student information you provide to us is mandatory, some of it requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain student information to us or if you have a choice in this.

How we store student data

We hold student data securely on servers held in school and as paper records held in secure cabinets. In addition, data is held by three external providers:

Parentmail provide support for our parent communication and payment arrangements and the data they retain is kept on servers in encrypted form. Further information about how Parentmail comply with the Data Protection Act can be found via this link:

<https://www.parentmail.co.uk/gdpr>.

MyConcern provides a secure repository for the recording of incidents in school. Further information on their compliance can be found at

<https://www.myconcern.co.uk/gdprcompliance/>

SISRA provides the school with the ability to track and analyse student achievement data. Further information on their compliance can be found at

<https://www.sisra.com/datasecurity/#>

Who we share student information with

We routinely share student information with:

- Our local authority (e.g. admissions)
- The Department for Education (e.g. attainment)
- The pupil's family and representatives (e.g. attendance)
- Educators and examining bodies
- Our regulators Ofsted, DFE and the ESFA (e.g. pupil data)
- Suppliers and service providers (e.g. careers advisers)
- Central and local government (e.g. attainment)
- Health authorities (e.g. immunisations)
- Health and social welfare organisations (e.g. social services)
- Professional advisers, bodies and consultants (e.g. Educational psychologist) ☒ Police forces, courts, tribunals (in relation to safeguarding)
- Collaborating schools for moderating purposes.

Why we regularly share student information

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

Department for Education

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our students with the Department for Education (DfE) either directly or via our local authority for the purpose of those data collections, under regulation 5 of The Education (Information About Individual Students) (England) Regulations 2013.

All data is transferred securely and held by DfE under a combination of software and hardware controls, which meet the current [government security policy framework](#).

Requesting access to your personal data

Under data protection legislation, parents and students have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact the Clerk to the Governors by email on gdp@rugbyhighschool.co.uk by telephone on 01788 810518; or, by post at Rugby High School, Longrood Road, Rugby CV22 7RE.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- a right to seek redress, either through the ICO, or through the courts.

Requests that cannot be fulfilled:

Please be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This includes information which identifies other people or information which involves legal advice being given to or sought by the School. The School is also not required to disclose any student examination scripts or other information consisting solely of student test answers, provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the School itself for your education. The “right to be forgotten” – we will sometimes have important reasons to refuse specific requests to amend, delete or stop processing your personal data. For example, a legal requirement or where it falls within a legitimate interest as identified in this Notice.

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner’s Office at <https://ico.org.uk/concerns/>

Contact

If you would like to discuss anything in this privacy notice, please contact: Clerk to the Governors by email on gdp@rugbyhighschool.co.uk by telephone on 01788 810518; or, by post at Rugby High School, Longrood Road, Rugby CV22 7RE.

This notice is based on the [Department for Education’s model privacy notice](#) for the school, amended to reflect the way we use data in this school.