



Privacy Policy

Last reviewed on: March 2026

Next review due by: March 2028

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 [UK General Data Protection Regulation \(UK GDPR\)](#), the lawful bases we rely on for processing student information are:

- **Public Task:** the processing is necessary for the school to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
- **Legal Obligation:** the processing is necessary for us to comply with the law
- **Consent:** the individual has given clear consent for us to process their personal data for a specific purpose.
- **Vital Interests:** the processing is necessary to protect someone's life.
- **Legitimate interests:** the processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (only relevant to information processed outside our official function as a school)

Some of the information we process falls into "special categories" of more sensitive personal data. To process special category data, in addition to one of the lawful bases specified above, we must also satisfy one of the additional lawful reasons outlined in data protection law. These include:

- We have explicit consent of the data subject
- The processing involves data that has been made manifestly public by the data subject
- Processing is necessary for establishing, exercising, or defending legal claims.
- Processing is necessary for reasons of substantial public interest
- Processing is necessary for preventative or occupational medicine, or for reasons of public interests in the area of public health.
- The processing is necessary for archiving, historical research, or statistical purposes in the public interest.

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:

Arbor is the Schools Management Information system and is a cloud based software. [Arbor Privacy Notice \[FINAL July 2024\]](#)

Parentmail provide support for our 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:

<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/#>

Personal data is retained by the school in accordance with our retention schedules, which is guided by the Information Records Management Society. More information can be found here: <https://irms.org.uk/>

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 and the DFE (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 regularly share personal data to support students' learning, development and wellbeing, and to comply with our legal obligations. We do not share information about our students with anyone without consent unless the law and our policies allow us to do so.

Youth support services

Pupils aged 13+

Once our pupils reach the age of 13, we also pass pupil information to our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- youth support services
- careers advisers

The information shared is limited to the child's name, address and date of birth. However, where a parent or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the child / pupil once they reach the age 16.

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 School Data Lead (Mrs L Wallace) by email on l.wallace@rugbyhighschool.co.uk by telephone on 01788 810518; or, by post at Rugby High School, Longrood Road, Rugby CV22 7RE.

Data protection law also grants individuals with the right to:

- be informed about the collection and use of your personal data.
- ask us to change information you think is inaccurate or incomplete.
- in certain circumstances, ask us to delete the information we hold about you.
- in certain circumstances, object to the processing.

- In certain circumstances, ask us to stop using your data.
- Where relevant, withdraw consent at any time.
- Make a complaint about how we handle your data, and where you are not satisfied with our response, seek redress through the Information Commissioner's Office (ICO) or the courts.

Requests that cannot be fulfilled:

Where there is a legitimate reason, we may refuse to comply with your information rights request. Examples of some of those reasons are set out below.

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 or received by the School itself for your education.

We will not be able to comply with requests to erase data that is required for us to fulfil our public task or where we have a legal obligation to process the data. We will also be unable to comply with objection requests where the data is processed for the purposes of fulfilling a legal obligation, the data is needed to protect the vital interests an individual, or where we require the data to fulfil a contract we have in place with you.

Complaints

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 by contacting Louisa Wallace (l.wallace@rugbyhighschool.co.uk). We will acknowledge your complaint within one calendar month and investigate without undue delay. Where you are not satisfied with our response to your concern, you have the right to escalate the matter to the Information Commissioner's Office at <https://ico.org.uk/concerns/>.

Phone Recordings

Rugby High School may record both incoming and outgoing phone calls. The purpose of this facility includes:

- Training and monitoring for staff
- Investigating and resolving complaints
- Protecting staff from abuse or aggressive callers

The purpose for recording calls align with the schools aim to improve service delivery, maintain accurate records, ensuring staff safety, and assisting the school with compliance with statutory duties (e.g., safeguarding, complaints handling).

These objectives are legitimate, proportionate, and in the reasonable interests of the school, staff, pupils, and parents.

Any recordings are retained for 6 months and are only accessible by the Schools Data Lead and Savvy IT, who provide IT support for the school.

Transcripts of call recordings would form part of a Subject Access Request, where phone numbers are legitimately linked to the person requesting information.

Contact Details:

If you need to contact us regarding the details contained within this privacy notice, you can get in touch with the school directly or our Data Protection Officer (DPO).

School contact details:

Louisa Wallace
Data Protection Lead
Rugby High School
Longrood Road
Rugby
CV22 7RE
Email: l.wallace@rugbyhighschool.co.uk

DPO contact details:

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL
Email: schooldpo@warwickshire.gov.uk