

Privacy Notice (for students and their families)

Aylesbury High School is the *data controller* of the personal information you provide to us. This means the school determines the purposes for which, and the manner in which, any personal data relating to pupils and their families is to be processed. The Data Protection Lead, Mr K Marshall, acts as the representative for the school with regard to its data controller responsibilities and can be contacted on 01296 388222 or DPO@ahs.bucks.sch.uk.

Mr C King is the Data Protection Officer. His role is to oversee and monitor the school's data protection procedures, and to ensure they are compliant with the GDPR. The Data Protection Officer can be contacted at DPO@ahs.bucks.sch.uk.

If you need to tell the School about an update for your personal data then please contact the relevant Pastoral Support Assistant for you/your daughter's Key Stage or use office@ahs.bucks.sch.uk.

Why do we collect and use your information?

Aylesbury High School holds the legal right to collect and use personal data relating to pupils and their families and we may also receive information regarding them from their previous school, Local Authority and/or the DfE. We collect and use personal data in order to meet legal requirements and legitimate interests set out in the GDPR and UK law, including those in relation to the following:

- Article 6 and Article 9 of the GDPR
- Education Act 1996
- Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013

In accordance with the above, the personal data of students and their families is collected and used for the following reasons:

- to support student learning
- to monitor and report on student progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing
- to enable students to quickly and easily access catering and library services

What data do we hold and use?

The categories of student information that we collect and use include:

- Personal information (such as name, unique student number, date of birth and address)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Biometric information (includes photographs and digital finger scans)
- Assessment information
- Relevant medical information
- Special educational needs information
- Exclusions / behavioural information

The categories of parent and other student contact information that we collect and use include:

- Personal information (such as name, date of birth and address)
- Contact information (such as email addresses and telephone numbers)
- Student relationship (information relating to your links to the student, such as your relationship to them)

We collect and process sensitive data (known as Special Category Data) such as special educational needs or safeguarding information where there is a legal obligation so to do or there is a legitimate interest in supporting a student's education and welfare. In such cases we ensure either the subject has given explicit consent or it is necessary to protect the vital interests of the data subject or of another person.

How long is your data stored for?

Personal data relating to pupils and their families is stored in line with the School's GDPR Data Protection Policy. In accordance with the GDPR, the school does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected. We normally hold student data after they have left the School until they reach the age of 25.

Will my information be shared?

The school is required by UK Law to share student data with the DfE via statutory data collections; some of this information is then stored in the The National Pupil Database (NPD) which is managed by the DfE. The DfE may share information about our students from the NDP with third parties who promote the education or wellbeing of children in England by:

- Conducting research or analysis
- Producing statistics
- Providing information, advice or guidance

The DfE has robust processes in place to ensure the confidentiality of any data shared from the NDP is maintained.

The School also routinely shares student information with:

- schools that the student's attend after leaving us
- our local authority
- parents and legal guardians

This shared information includes the names, addresses and contact information of students' families, but does not include biometric information.

Once a student reaches the age of 13 we also pass student information to our local authority or their 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 youth support services and careers advice. A parent or guardian can request that only their child's name, address and date of birth is passed to their local authority or provider of youth support services by informing us. This right is transferred to the student once they reach the age of 16. We may also share specific personal data of pupils who are aged 16 and over with post-16 education and training providers, in order to secure appropriate services for them. The information provided includes

addresses and dates of birth of all pupils and their parents, and any information necessary to support the services, e.g. school name, ethnicity or gender.

In some cases, your data will be outsourced to a third party processor who will provide a service to us. We do this either to enhance student attainment through analysis of their achievement data or to enhance their school experience by providing services such as cashless catering, on-line payments or educational trips, or improve efficiency through quicker identity confirmation for registration or library services. The companies that we currently routinely use for such services include:

- Transfer testing applicant photos, family contact and medical information - The Bucks Grammar Schools
- Email and document storage - Google
- On-line payment and parent communications - ParentMail
- Parent communications - SchoolComms
- Library records - Oliver
- Cashless catering - Nationwide
- Accounts - SAGE
- Achievement analysis - Fischer Family Trust
- On-line assesment (eg CATS) - CEM

We have a legitimate reason for sharing this data with these companies and will only do so where we are satisfied that data will be protected and not misused. If you do not want us to pass personal data to such companies and we are able to comply with your request without prejudicing the school's operation or a student's education, we will comply with your request; we will explain to you the reasons if we cannot comply with this type of request.

What are your rights?

Parents and pupils have the following rights in relation to the processing of their personal data.

You have the right to:

- be informed about how we use your personal data
- request access to the personal data that we hold. To make a request for your personal information, or be given access to your child's educational record, contact the Data Manager at School
- request that your personal data is amended if it is inaccurate or incomplete
- request that your personal data is erased where there is no compelling reason for its continued processing
- request that the processing of your data is restricted in certain circumstances
- object to the processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing

Where the processing of your data is based on your consent, you may withdraw this consent at any time.

Where can you find out more information?

If you would like to find out more information about how we use and store your personal data, please visit our website and download our GDPR Data Protection Policy.

If you have a concern about the way we are collecting or using your personal data, you should in the first instance let us know so that we can try and resolve your concern. If you are unhappy with the way we respond you may use our Complaints Procedure and if still dissatisfied, you can raise a concern with the Information Commissioner's Office (ICO) - to find out how to contact them, please visit their website www.ico.org.uk.

Privacy Notice (for the School's workforce)

Aylesbury High School is the *data controller* of the personal information you provide to us. This means the school determines the purposes for which, and the manner in which, any personal data relating to the school workforce and their families is to be processed. The Data Protection Lead, Mr K Marshall, acts as the representative for the school with regard to its data controller responsibilities and can be contacted on 01296 388222 or DPO@ahs.bucks.sch.uk.

Mr C King is the Data Protection Officer. His role is to oversee and monitor the school's data protection procedures, and to ensure they are compliant with the GDPR. The Data Protection Officer can be contacted at DPO@ahs.bucks.sch.uk.

If you need to tell the School about an update for your personal data then please contact the Headteacher's PA.

Why do we collect and use your information?

Aylesbury High School holds the legal or legitimate right to collect and use personal data relating to employees, volunteers and other persons who work in the school.

We use school workforce data to:

- enable the development of a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- enable individuals to be paid
- support individuals with disability or medical conditions at work
- manage absence and ill health issues
- enable staff to be recognised by other staff and students
- make staff access to areas of the school, catering and library services more easy and efficient

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain school workforce information to us or if you have a choice in this.

What data do we hold and use?

The categories of school workforce information that we collect, process, hold and share include:

- personal information (such as name, employee or teacher number, national insurance number)
- special categories of data including characteristics information such as gender, age, ethnic group, disability and medical data
- contract information (such as start dates, hours worked, post, roles and salary information)
- work absence information (such as number of absences and reasons)
- qualifications (and, where relevant, subjects taught)
- Biometric information (photographs and digital finger scans)
- Information on criminal convictions provided through the Disclosure and Barring Service

We collect and process sensitive data (known as Special Category Data) such as medical needs or criminal conviction information where there is a legal obligation so to do or there is a legitimate interest in supporting a person's welfare. In such cases we ensure either the subject has given explicit consent or it is necessary to protect the vital interests of the data subject or of another person.

How long is your data stored for?

In accordance with the GDPR, the school does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected. Personal data relating to the School's workforce is usually retained for 7 years to comply with HMRC audit requirements, after which time the personal data will be erased or destroyed. The basic contract information, ie who was employed in what role and when, will be retained indefinitely. Data relating to unsuccessful applicants will be retained for 6 months.

Will my information be shared?

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

Department for Education (DfE)

We share personal data with the Department for Education (DfE) on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, links to school funding / expenditure and the assessment of educational attainment. We are required to share information about our staff with the (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Payroll Bureau

We share basic data including name, address, National Insurance number and date of birth with our payroll provider as it is a legitimate requirement in order for them to process our payroll, inform the HMRC and pension bodies, and arrange payment for staff.

HMRC

We share basic data including name, address, National Insurance number and date of birth with the HMRC because we have legal obligation to notify them of payments made and to enable them to collect the correct National Insurance and tax payments from staff.

Pension Bodies

We share basic data including name, address, National Insurance number and date of birth with pension bodies, as it is a legitimate requirement in order to allow them to manage staff pensions.

Third Party Service Providers

We share basic personal data (such as name, address and date of birth) with third party service providers, as it is needed to enable their systems to identify the staff user and communicate with them or provide the service to staff for which we have contacted with them. We routinely share data as follows:

- email and document storage systems - Google
- on-line payment and automated communications - ParentMail
- library records - Oliver
- cashless catering - Nationwide
- accounts - SAGE

We have a legitimate reason for sharing this data with these commercial companies and will only do so where we are satisfied that data will be protected and not misused. If you do not want us to pass personal data to such companies and we are able to comply with your request without prejudicing the school's operation, we will comply with your request; we will explain to you the reasons if we cannot comply with this type of request.

What are your rights?

Staff, volunteers and other school workers have the following rights in relation to the processing of their personal data.

You have the right to:

- be informed about how we use your personal data.
- request access to the personal data that we hold. To make a request for your personal information, or be given access to your child's educational record, contact the Data Manager at School.
- request that your personal data is amended if it is inaccurate or incomplete.
- request that your personal data is erased where there is no compelling reason for its continued processing.
- request that the processing of your data is restricted in certain circumstances.
- object to the processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing

Where the processing of your data is based on your consent, you may withdraw this consent at any time.

Where can you find out more information?

If you would like to find out more information about how we use and store your personal data, please visit our website and download our GDPR Data Protection Policy.

If you have a concern about the way we are collecting or using your personal data, you should in the first instance let us know so that we can try and resolve your concern. If you are unhappy with the way we respond you may use our Complaints Procedure and if still dissatisfied, you can raise a concern with the Information Commissioner's Office (ICO) - to find out how to contact them, please visit their website www.ico.org.uk.

Privacy Notice (for the School's Donors and Alumni)

Aylesbury High School is the *data controller* of the personal information you provide to us. This means the school determines the purposes for which, and the manner in which, any personal data relating to donors to the school and Alumni is to be processed. The Data Protection Lead, Mr K Marshall, acts as the representative for the school with regard to its data controller responsibilities and can be contacted on 01296 388222 or DPO@ahs.bucks.sch.uk.

Mr C King is the Data Protection Officer. His role is to oversee and monitor the school's data protection procedures, and to ensure they are compliant with the GDPR. The Data Protection Officer can be contacted at DPO@ahs.bucks.sch.uk.

If you need to tell the School about an update for your personal data then please contact the Development and Alumni Relations Department at the School.

Development and Alumni Relations Privacy Statement

The aim of this Privacy Notice

Our alumni and supporters are extremely important to us and this Privacy Notice explains how Aylesbury High School's Development and Alumni Relations Department collects, stores, manages and protects your data. It outlines the types of data that we hold and how we use it to provide services to our alumni and supporters. We aim to be clear when we collect your personal information and not do anything you would not reasonably expect.

Who we are and what we do

The Development and Alumni Relations Department supports Aylesbury High School through contact with alumni, students, and supporters of the school. We do this by offering a range of academic, social and networking events and publications. We also fundraise to support the school's students, teaching, research and capital projects.

In order to do this, we have a database that contains personal data collected by the school during the course of our relationship with students, alumni, donors and supporters. Initially, data about students is transferred into our database from the student record system. The vast majority of the information we hold is obtained directly from you and we always aim to keep your details up to date, and to check that the contact details we have for you are correct, and, where appropriate, update them. As a result, some of the data may also have been obtained from publicly available sources – for example, we may find a new address for you by using the Royal Mail's National Change of Address database (NCOA). We value our relationship with you and we use your personal data to ensure we contact you in the most appropriate way and to ensure we work efficiently and effectively.

Our responsibilities and legal basis for processing your data

As part of our work we process and store personal information relating to students, staff, alumni, current and potential supporters and friends of Aylesbury High School and we therefore adhere to the Data Protection Act 2018 and General Data Protection Regulation (GDPR). We take our responsibilities under this Act seriously and ensure the personal information we obtain is held, used, transferred and processed in accordance with the Act.

Aylesbury High School's Development and Alumni Relations Department processes the information outlined in this Privacy Notice in pursuit of our legitimate interests in:

- Communicating with students, staff, alumni, and current and potential supporters
- Providing benefits and services to students, staff, alumni and supporters
- Furthering the school's educational charitable mission (which includes fundraising and securing the support of volunteers)
- Enabling the school to achieve its strategic and operational goals

We may pursue these legitimate interests by contacting you by email, post or social media. Information about how you can manage the ways that we contact you, including how to opt out from some or all contact from the Development and Alumni Relations Department, is outlined in the 'Your rights' section below.

Whilst Aylesbury High School relies on legitimate interest as the legal basis for processing, where this is not overridden by the interests and rights or freedoms of the data subjects concerned, it recognises that it is not the only lawful ground for processing data. As such, where appropriate, Aylesbury High School's Development and Alumni Relations Department will sometimes process your data on an alternative legal basis – for example, because you have given us consent to do so.

The data we hold

The personal data the Development and Alumni Relations Department stores and processes, which is given to us by our alumni, may include:

- Name, title and gender
- Contact details including postal address, email address, phone number and links to social media accounts (LinkedIn)
- Information about your time at the school and other academic institutions
- Your occupation and professional activities
- Your interests supporting the school
- Your relationships to other alumni, supporters and friends
- Records of donations and Gift Aid status, where applicable (as required by HMRC)
- Records of communications sent to you by the Development and Alumni Relations Department or received from you
- Volunteering by you on behalf of the school
- Media articles about you
- Archived photographs
- information on your engagement in school meetings, events, groups or networks

How we use your data

Unless you have requested otherwise, your data may be used and processed for a full range of alumni engagement and fundraising purposes. These include the following communications and marketing activities, which may be sent by mail, email, telephone and social media:

- School publications
- Notification of alumni events
- Fundraising programmes
- Promotion of alumni and student mentoring initiatives.

The school may use third-party partners to support the activities described above. The receipt of data by the Development and Alumni Relations Department in this manner is subject to the third party's own privacy policy. A list of parties with whom we partner in this way is available on request. Data

obtained in this way is treated no differently to any other once held by Development and Alumni Relations Department, and is bound by the terms of this Privacy Notice as soon as it is received.

We may carry out projects to find new contact details for alumni with whom we are not in contact, to ensure the school can remain in touch with as many of its alumni as possible. If you provide us with contact details for a particular method of communication we will assume that you have given us your consent for us to update your record and communicate with you using this information, unless you have told us otherwise. Contact details provided directly by you will update any previous preferences in relation to this channel unless you inform us otherwise. If you are registered with the Telephone Preference Service (TPS) but provide us with a telephone number, we will assume that we have your consent to call you on this number. Fundraising is a key part of the Development and Alumni Relations Department, and we are committed to working in a transparent, ethical, responsible and honest way.

Protecting your data

We are committed to holding your data securely and treating it with sensitivity. All data is held securely and in accordance with the Data Protection Act 2018 and General Data Protection Regulations (GDPR). Your data is held on a database hosted on a secure server within the school network. This database is protected by multi-level authentication and access is restricted to individuals who need to see the data to carry out their duties at the school. This is limited to: members of staff in the Development and Alumni Relations Department; assigned IT support; and colleagues from other areas within the school who work closely with the Development and Alumni Relations Department on the provision of services to alumni and supporters, such as the Careers Coordinators. User access rights to the database are restricted according to individual job roles in order to ensure that users only see information relevant to them. This access is reviewed on a regular basis.

Unless we have a legal obligation to do so, we will not disclose your data to individuals, organisations or other entities outside the school. All external entities with whom data is being shared and to whom we are not legally bound must sign a contract and/or a confidentiality and non-disclosure agreement before any data transfer takes place. We do not sell to or trade your data with any other organisations.

Your rights

The Development and Alumni Relations Department considers its relationship with alumni and supporters to be lifelong, and we will hold your details until you tell us you no longer wish to hear from us. We will always try to ensure that the data we hold for you is up to date, reasonable and not excessive. You will always have the right to:

- be informed as to how we use your data (via this Privacy Notice);
- access or request a copy of the data we hold about you;
- update, amend or rectify the data we hold about you
- change your communication preferences at any time to restrict how we process your data, or opt out of some or all communication from Development and Alumni Relations Department
- ask us to remove your data from our records
- withdraw consent, where it is used as a legal basis for processing
- object to or restrict the processing of your information for any of the purposes outlined above.

If you have any questions about this Privacy Notice, or would like to receive a copy of the information we hold about you, please contact us at: Development and Alumni Relations, Aylesbury High School, Walton Road, Aylesbury, HP21 7SX, or telephone 01296 388222

Future changes

From time to time, we may use your information for new purposes not currently described in this Privacy Notice. If our information practices change at some time in the future, we will always inform you of policy changes.