

SUTTON GRAMMAR SCHOOL TRUST

Data Protection Policy

This policy is the Sutton Grammar School Trust Data Protection Policy in accordance with the Data Protection Act 2018 and the General Data Protection Regulation.

It explains why Sutton Grammar School Trust - the Trust - collects personal information about Members and Directors of the Trust, staff, parents, students, volunteers, and how it is used and how it is kept secure.

For the purpose of this Policy:

“Member” or “Director” means a Member or Director of the Trust, whether appointed or elected.

“Staff” means any full time or part time employee and any person employed under a contract for service.

“Student” means any student enrolled on a course offered by Sutton Grammar School.

“Parent” means any parent or guardian and any person in *loco parentis* of a student as notified to the School.

“Volunteer” is any person providing a service to the Trust or the School for which no payment other than out of pocket expenses is paid.

The Trust will collect, use and store a data, as described in this Data Protection Policy and as described when Trust collects data from an individual.

The Trust reserves the right to amend this Data Protection Policy from time to time without prior notice. This Policy and any amendments that have been made are published on the School website <https://www.suttongrammar.sutton.sch.uk>.

The Trust will always comply with the Data Protection Act 2018 (DPA) and the General Data Protection Regulation (GDPR) and any statutory amendment, revision or repeal when dealing with a personal data. Further details on the DPA and the GDPR can be found at the website for the Information Commissioner <https://ico.org.uk>

The Trust’s Data Protection Officer is Dr. N S Wrench Sutton Grammar School Trust Manor Lane SUTTON SM1 4AS or email: dpo@suttongrammar.sutton.sch.uk

For the purposes of the DPA the Trust is the “data controller” of all personal data it holds about an employee, student, parent or volunteer.

Type of information	Purpose	Basis of processing
Personal details: name, address, telephone numbers, e-mail address(es), NI number, tax details: DBS certificate number	Managing the Staff and volunteers	Schedule 1 Part1 (1) DPA 2018. For the purposes of Trust’s legitimate interests in operating the School.

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Date of birth / age related information / marital status / parenthood /	Employment, social security and social protection. Managing membership of pension schemes: statutory returns regarding employment	Schedule 1 Part1 (1) DPA 2018 Performing the Trust's contract with the Staff.
Gender / Ethnic Origin / Health	Equality of opportunity or treatment; Providing national statistics	Schedule 2 Part2 (6),(9) DPA 2018
Academic qualifications	To appoint staff with appropriate skills	To meet the requirements of the post and the general legal standards required of teachers.
Professional qualifications and experience	To ensure that persons appointed to executive and management positions are suitably qualified or experienced	To meet the requirements of the post ensure the efficiency of the management of the Trust's operations
Emergency contact details for staff	Contacting next of kin in the event of emergency	Consent: Protecting an individual's vital interests and those of their dependants
Personal details: name, address, telephone numbers, e-mail address(es), DBS certificate number	Managing the Members and Directors	Companies Act 2006; Independent Schools Regulations
Biometric data: Employees, Volunteers, Members, Directors	To ensure the efficiency of the Trust services and provide a safe working environment. To provide services such a paying for canteen meals, library services, access and egress to buildings and computer services.	Consent: Biometric data will only be acquired by consent.
Parent's name, address and telephone numbers	Students' admissions to the School	Admissions law. Education Act 1996
The e-mail address of a parent	Creating and managing the School's contact database.	Consent: For the purposes of Trust's legitimate interests in operating the School. A parent may withdraw consent at any time by contacting the Data Protection Officer by letter stating that permission to use/publish the parent's email address is withdrawn.
Student Data	Maintaining the student's educational record	The Education (Information About Individual Pupils) (England) Regulations 2013

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Student's Medical Information	To permit emergency medical treatment to a student not able to authorise such treatment	Consent: A student or a parent may authorise the School to obtain emergency medical treatment. The School will only permit a student to take prescription medicine whilst on school premises or during a school trip with the consent of a parent.
Biometric data: Students	To provide services such as paying for canteen meals, library services, access and egress to buildings and computer services.	Consent: A student's Biometric data will only be acquired in accordance with the Trust's published policy.
Photos and videos of individuals participating in events	Publicity: Putting images on the School website, on social media pages, and using in press releases and publications.	Consent: The Trust will not identify an individual by name unless it has received written or emailed consent as set out in the Media Policy. Pictures of students not deemed to be able to give consent will be published only with the Consent of a parent or guardian. Written consent may be specific and time limited or general. General consent may be withdrawn at any time by contacting Data Protection Officer by letter.
Bank account details of the employee or other person making payment to, or receiving payment from, the Trust	Payment of salaries and expenses. Payment of invoices etc. Managing the provision of services and benefits.	Performing the relevant contractual obligations with staff and suppliers.
Special Category personal data; race or ethnic origin, political or religious beliefs, trade union membership or details of sexual life.	Individuals are under no obligation to disclose this information.	The Trust will not seek this information unless it will be beneficial for both parties for the Trust to have the information or its acquisition is required by Law for example providing equality data.

How Trust protects personal data

The Trust and the School will not transfer personal data unless the law requires the Trust or the School to do so.

The Trust and the School will not transfer personal data outside the EU without formal consent.

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The Trust has implemented generally accepted standards of technology and operational security in order to protect personal data from loss, misuse, or unauthorised alteration or destruction.

The Trust will use recognised online secure payment systems for any payments which the Trust takes or makes online to/from an employee, parent, student, or volunteer.

Please note however that when an individual transmits information to or from us over the internet this can never be guaranteed to be 100% secure.

The Trust will notify any individual promptly in the event of any breach of personal data which might expose the individual to serious risk.

Who else has access to the information provided to the Trust?

The Trust will never sell personal data.

The Trust will not share an employee's, parent's, student's or volunteers personal data with any third parties without prior consent (which an employee, parent, student or volunteer is free to withhold) except where required to do so by law or as set out in the table above or in the next paragraph. The Trust is required to pass certain student data to the Department of Education (more detail will be found in Student Privacy Notice.)

The Trust may pass personal data to third parties who are service providers, agents and subcontractors to the Trust or the School but only for the purposes of completing tasks and providing services to an employee, parent, student or volunteer (e.g. to provide school visits and trips, arrange appropriate insurance, print newsletters and send you mailings). The Trust will only transfer the personal data that is necessary for the third party to deliver the service. The Trust will have a contract in place that requires the third party to keep your information secure and not to use it for its own purposes.

How long does the Trust keep your information?

The Trust holds personal data on its systems for as long as you are an employee, volunteer or parent or student and for as long afterwards as is necessary to comply with legal obligations.

The Trust will review personal data every year to establish whether the Trust is still entitled to process it. If Trust decides that it is not entitled to do so, the Trust will stop processing an employee's, volunteer's, parent's or a student's personal data.

The Trust will retain personal data in an archived form in order to be able to comply with legal obligations e.g. education law, compliance with tax requirements and exemptions, and the establishment, exercise or defence of legal claims.

The Trust will securely destroy all financial information once it has been used and there is no longer any need for it.

Further details of how long the Trust keeps data may be found in the Trust's Data Retention Policy.

Your rights

As a Member, Director, employee, volunteer, parent or student aged over 13 you have the right under the DPA to:

- access personal data;
- be informed how about how the personal data is processed;
- have personal data corrected;
- have personal data erased in certain circumstances;
- object to or restrict how personal data is processed;
- have your personal data transferred to you or to another business in certain circumstances.

Withdrawing Consent

Where this Policy shows that the Trust relies on consent to process data you may withdraw consent by contacting the Data Protection Officer, Sutton Grammar School Manor Lane SUTTON SM1 4AS. This MUST be done by letter clearly stating the data for which consent is withdrawn.

Further Information

For more details, please address any questions, comments and requests regarding the Trust's data processing policy and practices by letter to Data Protection Officer, Sutton Grammar School Manor Lane SUTTON SM1 4AS or email dpo@suttongrammar.sutton.sch.uk

Complaints

You have the right to take any complaints about how the Sutton Grammar School Trust processes your personal data to the Information Commissioner:

Contact details: <https://ico.org.uk/concerns/>

0303 123 1113 (local rate) or 01625 545 745 (national rate)
Information Commissioner's Office
Wycliffe House
Water Lane
WILMSLOW
Cheshire SK9 5AF