



Rishworth School

Privacy Notice and annexes

The EU General Data Protection Regulation (GDPR) includes rules on giving privacy information to those whose data is held by an organisation (data subjects). These are more detailed and specific than in the previous Data Protection Act 1988 and place an emphasis on making privacy notices understandable and accessible. Data controllers are expected to take 'appropriate measures' to ensure that this is the case. The school interprets this as using very clear language to outline each of the responsibilities for each of the data subject groups.

The GDPR say that the information provided to data subjects about how the school processes their personal data must be:

- concise, transparent, intelligible and easily accessible;
- written in clear and plain language, particularly if addressed to a child; and
- free of charge

These requirements are about ensuring that privacy information is clear and understandable for data subjects. This privacy notice deals with the overall privacy responsibilities of the school but includes, as annexes the particular notices that apply to parents, pupils under the age of 13, pupils over the age of 13, staff, Governors and alumni. The appropriate annex should be read by the appropriate data subject along with the overarching notice.

Each annex deals with two sources of data, that obtained directly from the subject and, data not obtained directly from the subject. For both sources the Identity and contact details of the data handler (and where applicable, the handler's representative) and the data protection officer (or privacy officer) are provided.

The intention is that each privacy notice is used as a stand-alone document, introduced and covered by the paragraphs above.

Privacy Notice Rishworth & Heathfield School – parents (or guardians) of children at the school, or applying to join the school

This annex should be read in conjunction with the introductory paragraphs in the covering document. The italicised paragraphs in blue refer to guidance from the ICO on the compilation of privacy notices. The blue sections are the sections that the ICO needs the school to comply with in its dealings with you.

The privacy notice should be provided at the time the data was obtained, if it was obtained directly from the data subject.

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

The purpose of the processing and the legal basis for processing must be clearly stated and the categories of personal data held must be clearly stated.

Data will be processed for the purposes of responding to requests for information about joining the school and the school will therefore have a “legitimate interest” for processing basic personal data and sensitive personal data. The data the school holds will be the minimum it requires to form and maintain the contract between you and the school.

Any recipient or categories of recipient must be clear and it should also be clear if data transfer to other countries and the safeguards in place.

The school will share your data with the following companies who have contracts with the school and who have equalled the school’s precautions and systems for dealing with data, these are:

- School photographers
- Health care service providers
- IT Contractors
- IT software providers
- DBS Clearance providers
- Government, educational or legislative agencies such as the Charity Commission, HMRC, Companies House, DFE, ISBA, Local Authorities, and the Society of Heads
- The auditors, Sleigh Story

It is not necessary for data to be shared with other countries. One exception to this will be international trips that the school organises; should this be envisaged for your child, you will be contacted for your consent, the consent will be limited in time and content if it be required. In the case of Boarding students it may be necessary to share data with TIER 4 or other immigration authorities and with previous schools attended or a designated agency; in this regard you will be contacted for your consent and the consent will be limited in time and content if it be required.

The retention period for the data or the criteria used to determine the retention period.

The retention period for pupil data will be until the pupil reaches the age of 25, but may be modified by any other legal obligation the school finds itself under.

The existence of each data subject’s rights. The right to withdraw consent at any time.

You have the right to withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.

The right to lodge a complaint at any time with a supervisory authority.

You can complain at any time about how the school has handled your data; the Information Commissioner is available as follows:

ICO helpline is 0303 123 1113.

Where data is not obtained directly, the source from which it was obtained and whether or not it is a publicly available source.

For data obtained indirectly, the privacy notice should be provided within one month (referred to as a reasonable period of time), when the first communication takes place with an individual, or if disclosure is envisaged to another recipient, at the latest, before the information is disclosed.

We will obtain the data the school requires from you; should we need data from other sources we will contact you within a month.

Whether the provision of personal data is part of a statutory or contractual requirement or obligation and the possible consequences of failing to provide the personal data.

We see the provision of personal data as necessary to properly admit your child to the school and to administer, and for the school to fulfil its obligations under the contract once your child is a pupil here.

The existence of automated decision making including profiling and the information about how decisions are made, the significance and the consequences.

There is no automated decision making or profiling involved in this data stream into and through the school.

Privacy Notice Rishworth (and Heathfield) School – Children at the school over the age of 13.

This annex should be read with the introductory paragraphs in the covering document.

The paragraphs in blue refer to guidance from the Information Commissioner's Office (ICO) on the compilation of privacy notices. The blue sections are the sections that the ICO needs the school to comply with in its dealings with you.

The privacy notice should be provided at the time the data was obtained, if it was obtained directly from the data subject.

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly. This means you get this when the school gets your data from your parents, or within a month.

The purpose of the processing and the legal basis for processing must be clearly stated and the categories of personal data held must be clearly stated.

Data will be processed for the purposes of allowing you to make the best of your time at Rishworth (and Heathfield) School. The school will therefore have what is called a "legitimate interest" for processing basic personal data and sensitive personal data. The data the school holds will be the minimum it requires to allow you to thrive in your years here.

Any recipient or categories of recipient must be clear and it should also be clear if data transfer to other countries and the safeguards in place.

The school will share your data with the following companies who have contracts with the school and who have equalled the school's precautions, systems and procedures for dealing with data, these are:

- School photographers
- Health care service providers
- IT Contractors
- IT software providers
- DBS Clearance providers
- Government, educational or legislative agencies such as the Charity Commission, HMRC, Companies House, DFE, ISBA, Local Authorities, and the Society of Heads
- The auditors, Sleigh Story

It is usually necessary for data to be shared with other countries. The exception to this will be international trips that the school organises, should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it is required. In the case of Boarding students it may be necessary to share data with TIER 4 or other immigration authorities and with previous schools attended or a designated agency; in this regard you will be contacted for your consent and the consent will be limited in time and content if it be required.

The retention period for the data or the criteria used to determine the retention period.

The retention period for pupil data will be until you reach the age of 25, but may be modified by any other legal obligation the school finds itself under.

The existence of each data subject's rights. The right to withdraw consent at any time.

You have the right to withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.

The right to lodge a complaint at any time with a supervisory authority.

You can complain at any time about how the school has handled your data; the Information Commissioner is available as follows:

ICO helpline is 0303 123 1113.

Where data is not obtained directly, the source from which it was obtained and whether or not it is a publicly available source.

For data obtained indirectly, the privacy notice should be provided within a one month (referred to as a reasonable period of time), when the first communication takes place with an individual, or if disclosure is envisaged to another recipient, at the latest, before the information is disclosed.

We will obtain the data the school requires from you; should we need data from other sources we will contact you.

Whether the provision of personal data is part of a statutory or contractual requirement or obligation and the possible consequences of failing to provide the personal data.

We see the provision of personal data as necessary to properly manage your time at Rishworth (and Heathfield) School and for the School to fulfil its obligations to you.

The existence of automated decision making including profiling and the information about how decisions are made, the significance and the consequences.

There is no automated decision making or profiling involved in handling this data.

Privacy Notice Rishworth (and Heathfield) School – Governors of the school.

This annex should be read in conjunction with the introductory paragraphs in the covering document. The italicised paragraphs in blue refer to guidance from the ICO on the compilation of privacy notices.

The privacy notice should be provided at the time the data was obtained, if it was obtained directly from the data subject.

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

The purpose of the processing and the legal basis for processing must be clearly stated and the categories of personal data held must be clearly stated.

Data will be processed for the purposes of responding to requests for information about joining the Board of the school and the school will therefore have a “legitimate interest” for processing basic personal data and, if necessary, sensitive personal data. The data the school holds will be the minimum it requires.

Any recipient or categories of recipient must be clear and it should also be clear if data transfer to other countries and the safeguards in place.

The school will share your data with the following companies who have contracts with the school and who have equalled the school’s precautions, systems and procedures for dealing with data, these are:

- IT Contractors
- IT software providers
- Government or legislative agencies such as the Charity Commission, HMRC, Companies House, DFE, ISBA and the Society of Heads
- The auditors, Sleigh Story
- The School Solicitors, Schofield Sweeney and Eaton Smith

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the school organises, should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it is required.

The retention period for the data or the criteria used to determine the retention period.

The retention period for data on Governors to be held will be 50 years but may be modified by any other legal obligation the school finds itself under.

The existence of each data subject’s rights. The right to withdraw consent at any time.

You have the right to withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.

The right to lodge a complaint at any time with a supervisory authority.

You can complain at any time about how the school has handled your data; the Information Commissioner is available as follows:

ICO helpline is 0303 123 1113.

Where data is not obtained directly, the source from which it was obtained and whether or not it is a publicly available source.

For data obtained indirectly, the privacy notice should be provided within a one month (referred to as a reasonable period of time), when the first communication takes place with an individual, or if disclosure is envisaged to another recipient, at the latest, before the information is disclosed.

We will obtain the data the school requires from you, should we need data from other sources we will contact you first.

Whether the provision of personal data is part of a statutory or contractual requirement or obligation and the possible consequences of failing to provide the personal data.

We see the provision of personal data as necessary to safeguard you and the school as it will allow the necessary checks to be made.

The existence of automated decision making including profiling and the information about how decisions are made, the significance and the consequences.

There is no automated decision making or profiling involved in this data stream into and through the school.

Privacy Notice Rishworth (and Heathfield) School – alumni

This annex should be read in conjunction with the introductory paragraphs in the covering document. The italicised paragraphs in blue refer to guidance from the ICO on the compilation of privacy notices.

Routine contact with alumni will be by surface mail; email or social media will only be used as a method of contact if the individual gives consent to be contacted in this way.

The privacy notice should be provided at the time the data was obtained, if it was obtained directly from the data subject.

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

The purpose of the processing and the legal basis for processing must be clearly stated and the categories of personal data held must be clearly stated.

Should you give consent, data will be processed for the purposes of maintaining an accurate record of those who were educated at Rishworth (and Heathfield) School. The school will process only the minimum personal data to achieve this purpose.

Any recipient or categories of recipient must be clear and it should also be clear if data transfer to other countries and the safeguards in place.

The school will not share your data with any companies associated with the school. At the point of you leaving Rishworth School and paying the necessary lifetime membership fee, the school will share your data with the Old Rishworthians' so that they may keep in touch with you.

It is not necessary for data to be shared with other countries.

The retention period for the data or the criteria used to determine the retention period.

The retention period for alumni data will be unlimited as long as the school believes it has a relationship to serve with the alumnus.

The existence of each data subject's rights. The right to withdraw consent at any time.

You have the right to withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.

The right to lodge a complaint at any time with a supervisory authority.

You can complain at any time about how the school has handled your data; the Information Commissioner is available as follows:

ICO helpline is 0303 123 1113.

Where data is not obtained directly, the source from which it was obtained and whether or not it is a publicly available source.

For data obtained indirectly, the privacy notice should be provided within a one month (referred to as a reasonable period of time), when the first communication takes place with an individual, or if disclosure is envisaged to another recipient, at the latest, before the information is disclosed.

We will obtain the data the school requires from you, should we need data from other sources we will contact you first.

Whether the provision of personal data is part of a statutory or contractual requirement or obligation and the possible consequences of failing to provide the personal data.

We see the provision of personal data as necessary to safeguard you and the school as it will allow the necessary checks to be made.

The existence of automated decision making including profiling and the information about how decisions are made, the significance and the consequences.

There is no automated decision making or profiling involved in this data stream into and through the school.

Privacy Notice Rishworth (and Heathfield) School – employees of the school, or applying to join the school

This annex should be read in conjunction with the introductory paragraphs in the covering document. The italicised paragraphs in blue refer to guidance from the ICO on the compilation of privacy notices.

The privacy notice should be provided at the time the data was obtained, if it was obtained directly from the data subject.

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

The purpose of the processing and the legal basis for processing must be clearly stated and the categories of personal data held must be clearly stated.

Data will be processed for the purposes of responding to requests for information about joining the school and the school will therefore have a “legitimate interest” for processing basic personal data and sensitive personal data. The data the school holds will be the minimum it requires to form and maintain the contract between you and the school.

Any recipient or categories of recipient must be clear and it should also be clear if data transfer to other countries and the safeguards in place.

The school will share your data with the following companies who have contracts with the school and who have equalled the school’s precautions and systems for dealing with data, these are:

- School photographers
- IT Contractors
- IT software providers
- DBS Clearance providers
- Government or legislative agencies such as the Charity Commission, HMRC, Companies House, DFE, ISBA, pension schemes and the Society of Heads
- The auditors, Sleigh Story
- The School Solicitors, Schofield Sweeney

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the school organises, should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it be required.

The retention period for the data or the criteria used to determine the retention period.

The retention period for employee data will be until 50 years after employment ends, and may be modified by any other legal obligation the school finds itself under.

The existence of each data subject’s rights. The right to withdraw consent at any time.

You have the right to withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.

The right to lodge a complaint at any time with a supervisory authority.

You can complain at any time about how the school has handled your data; the Information Commissioner is available as follows:

ICO helpline is 0303 123 1113.

Where data is not obtained directly, the source from which it was obtained and whether or not it is a publicly available source.

For data obtained indirectly, the privacy notice should be provided within a one month (referred to as a reasonable period of time), when the first communication takes place with an individual, or if disclosure is envisaged to another recipient, at the latest, before the information is disclosed.

We will obtain the data the school requires from you, should we need data from other sources we will contact you within a month.

Whether the provision of personal data is part of a statutory or contractual requirement or obligation and the possible consequences of failing to provide the personal data.

We see the provision of personal data as necessary to properly employ you at the school and to administer, and for the school to fulfil its obligations under the contract once you are an employee here.

The existence of automated decision making including profiling and the information about how decisions are made, the significance and the consequences.

There is no automated decision making or profiling involved in this data stream into and through the school.