



Privacy Notice for Pupils

- 1) This Privacy Notice is written for pupils at Strathallan School. It is easier to refer to the School as “we” in this notice, and to pupils as “you”. It sets out what personal data we process about you why we do this and what your rights are in relation to your data.
- 2) The member of staff with overall responsibility for personal information relating to pupils is: Mr Streatfeild-James.
- 3) **What is personal data?**
 - a) “Personal data” is information which identifies you, such as your name together with your data of birth and your address. It can include further details such as your marks, reports, which teams you are in and letters, records or emails about you. It also includes your photo and any videos in which you can be identified.
 - b) “Sensitive personal data” is a special category under data protection law and covers health, ethnic origin, religion, sexual life and biometrics.
- 4) **Why do we collect and process data about you?**
 - a) We collect and process personal data in order to educate pupils and for the general running of the school community, for example to organise sports, activities, music and events. This is because we have a contract with your parents or your legal guardian to provide educational services for you, and because as a school processing data for these reasons is in our “legitimate interests”.
 - i) “Legitimate interests” means that in certain situations, because of our contractual obligation to you / your parents, or because of our legal responsibility to you / the School (including any member of staff or supplier to the School) / your fellow pupils / anyone else, we will need to collect or process or share personal information relating to you, regardless of whether or not you have provided the information or given your consent to the way in which that information is being used. Be aware that this will not be something commonly used, as our normal position will be transparency and fully informed and freely given consent from you or your parents or your legal guardian.
 - b) In some situations we may need to process information about you in order to protect your vital interests, for example if you need medical treatment and are unable to give consent at the time.
 - c) We have to share personal information with organisations which have a legal right to request it, for example to provide information to the UK or Scottish Government, the Police or Social Services.
- 5) **Security of your personal data**
 - a) We take appropriate measures to keep your personal information secure, but you have a responsibility to ensure that you are protecting your own personal information. You will be responsible for your user name and password and for any use you make of your personal information, such as showing information about yourself to your friends.
 - b) We will not pass on personal information to other organisations unless we are legally required to or unless we have mentioned them in this document. We will always share your personal information with your parents or legal guardian(s) unless there are legal reasons not to do so. We do not send your personal data to people or organisations outside the EU unless your parents, your legal guardian(s) or your agent are located outside the EU or unless you or your parents ask us to and we have your consent to share that information.



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6) Data processing within the School

- a) The School uses databases and paper records to store pupil records across a broad range of the School's activities: teachers and other staff can only see personal details of pupils if they need to see them. The School does not use computers to make decisions about pupils: all decisions made about you are made by members of the school staff.

7) We need to use the following services and information to provide your education, as part of our contract with your parents or legal guardian:

- a) **Your medical records:** your parents or legal guardian give these to the Health Centre, and they maintain the records. Some of the information is maintained by the National Health Service and remains on your NHS record. We share information about your dietary requirements and any medical conditions with those who need to know about them to protect your wellbeing.
- b) **Academic Work:** we use a number of online services to provide teaching resources and to test your progress.
 - i) You will have an account for the Library, for ClickView (video resources), Firefly (prep and work-related information). Most pupils will also have an account for Kerboodle (Languages, Sciences and other courses, providing extra materials), those taking Highers will have a SCHOLAR account for extra materials. These accounts will only last for as long as you are a pupil in the School and contain only your name and your network user name / school email address.
 - ii) Those taking music lessons or exams will be on the Music School Manager system which allows the Music Department to organise tuition and keep a record of exams and concerts.
- c) **Progress testing:** If you join the School for more than one year you will take a baseline test so that teachers can track your academic progress. Pupils in Form 3 and in Lower Sixth also complete a questionnaire which gives the pastoral staff a view of how each individual has progressed in terms of personal resilience. A summary of this data is kept after you leave the school, but the names and any other identifying details are removed so that it cannot identify you.
- d) **Dyslexia screening:** Pupils are tested for dyslexia when they join the school; the results of the tests are kept until you leave unless they form part of an application for special consideration in public exams, in which case they are kept until you are 25.
- e) **Door locks and mealtime signing in:** every pupil has a wristband which works the door locks on your Boarding House and allows you to sign in at mealtimes. The information is kept for one term only.
- f) **Sports programme:** teams, matches and so forth are managed by an online service (SOCS) which allows you and your parents to see when you are representing the School. This information is kept until you leave the School.
- g) **CCTV recordings:** Much of the School's estate is covered by CCTV cameras in order to keep the premises, the staff and the pupils secure. The recordings made are kept for 10 days unless there is a specific incident recorded which requires further investigation or action. The Police could ask the School for access to recordings.

8) You may want to use some of the following services, but not all are required by all pupils at all times:

- a) **Careers and Further Education services:**



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- i) If you apply to a UK university, you will need to create a UCAS account: the relationship is between you and UCAS, not between the School and UCAS.
 - ii) The School also provides careers and application support using online services, currently UNIFROG, GlobalBridge and FutureWise. These require you to give consent at the time to have your personal details entered and to use the services. UNIFROG information is removed when you leave the School; GlobalBridge and Futurewise remain available to you until you are 23.
 - b) **Public Exams:** if you are to take exams, your personal details (normally your name, date of birth and address) will be given to the appropriate exam board. This includes exams for drama and music. Exam boards normally keep your data indefinitely as you may want to have your results confirmed in the future if you lose the certificates.
 - c) **Access Arrangements for Public Exams:** Applications for any variation to standard examination conditions are known as Access Arrangements and cover such allowances as extra time for exams, the provision of a reader, prompter or scribe, the use of a computer or the use of adapted exam papers. Applications for Access Arrangements are made to the JCQ (Joint Council for Qualifications) for GCSE and A Level exams and to the SQA for Scottish exams. Applications are prepared by the Special Educational Needs Co-ordinator in accordance with the relevant regulations and are agreed with the candidate, who also signs a data protection agreement. The JCQ retain the candidate's personal details indefinitely.
 - d) **External Organisations – for those opting to join**
 - i) **Combined Cadet Force:** The Ministry of Defence will need your name, date of birth, address and ethnic group. The activities you take part in will be recorded on the Cadet database run by the Ministry of Defence. They keep records until you reach the age of 25. Within the School, only CCF Adults with security clearance have access to your CCF record.
 - ii) **Duke of Edinburgh's Award Scheme:** if you choose to join you will need to give your name, data of birth and contact details to the DoE Scheme. You will then communicate with them to keep your information up to date. They will communicate with the School in order that we are aware of your achievements or attainments.
 - iii) **Registration with a National Body for Sports:** if you play a sport which requires it, you will need to be registered with the appropriate organisation. You will be consulted before you are registered and you will be free to make a decision. We may need to pass some medical or biometric (height, weight) information to these organisations.
 - iv) **Entries for academic and extra-curricular schemes, competitions and events** (e.g. Debating, Olympiads, John Muir Award, Perform in Perth etc) will require some personal details to be passed to the relevant organisations. The School will check that these organisations will take of your personal information.
- 9) Your Pupil record** will consist of the information listed below and will be retained by the School until you are 25, at which point it will be deleted:
- a) **Personal details** (e.g. name, date of birth, gender, ethnic origin, address, photograph)
 - b) **Academic records** (Information generated over the course of your time at the School relating to academic work, reports. exams etc.)
 - c) **Extracurricular records** (Records of sporting, musical, cultural and other extracurricular activities generated over your time at the School)



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- d) **Attendance record** (Your daily attendance record runs from Registration in the morning and includes attendance at each timetabled academic lesson and games / activities sessions)
- e) **Pastoral records** (Any records of incidents, problems, notable successes etc. in your day to day life in the School; these records may also include referrals to outside agencies such as the Care Commission or Social Services)
- f) **Communications between the School and your parents** (On paper or by email, relating specifically to you rather than general information letters or messages)

10) The following records will be retained only as long as you are a member of the School:

- a) The record of your work assignments is held on the Firefly VLE for pupils in Form 3 and above, and you always have access to it. Marks and feedback for work assignments may also be recorded here. These records will be automatically deleted when you leave the School.
- b) Any of the accounts used to access the Library services and online teaching content providers. These accounts will be automatically deleted when you leave the School.
- c) Your School Email account and any data it contains; your School Network account and any data it contains; your Microsoft Office 365 account including the associated OneDrive cloud storage account and any data it contains. These will all be deleted as soon as you leave the School.

11) The following records may be retained for longer than 5 years after you leave the School:

- a) **Child Protection records** may be created for some pupils if the need arises. These are subject to legal restrictions on access and will be retained normally until the individual reaches 25 years of age.
- b) **Records of Needs** (for pupils with a Statement of Needs): we are required by law to retain these records for until the individual reaches 35 years of age.
- c) **Medical records:** These are based on the information supplied at the start of your time at the School and updated by the Health Centre. Some of these records will be held by the National Health Service, others by the Health Centre. Medical records held by the School will be destroyed and / or deleted when you reach 25 years of age.

12) Data retained by the School indefinitely

- a) Some records of historical importance to the School will be held in the Archives. These will be items already in the public domain, in the nature of the School Magazine (The Strathallian), School / Team / Group named photographs, honours boards, press reports, records of sports fixtures and a selection of photographs taken each session to capture the life of the School over that year.

13) Deletion of your School Record and passing of information to the Alumni Department

- a) Otherwise, when you reach the age of 25 most of your pupil record will be securely destroyed / deleted and we will keep only the following details: The Date, House and Year Group at the time of your enrolment and at the time you leave the School, your Destination School (for those under the School Leaving age) or Leaver's Destination (University / Employment etc.) for those leaving from the Upper Sixth.
- b) We encourage everyone to remain a part of the Strathallan community, particularly when your school career has finished, however we realise that the personal information we require as part of your education is not something we assume we can use after you have left the School. When you leave the School, you and your parents will be contacted by the



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Alumni Co-ordinator and will be able to give or withhold consent for your name and contact details to be retained and for any other information you wish to be retained relating to your time at Strathallan. This data is stored on the Alumni database.

14) Social Media

- a) The School uses social media to inform you and the wider world about news, events and the achievements of Strathallan pupils. We take care to run our social media accounts in a fair and reasonable way. However, you will know that once stories, pictures and comments are posted on the Internet, there is little control over who may read them and repeat them. We need your consent to publicise your achievements, and you can withdraw this consent at any time or for any particular news item in which you appear. Any information that does appear on the School's social media platforms will always be subject to the terms and conditions of those particular platforms and the restrictions on the School to carry out your instructions. Pupils' full names are not attached to posts, but they are usually included in linked newspaper articles.

15) Photography and Video

- a) Most people like to have their activities recorded and published, but this is not the case for everyone all of the time. We will ask you to give your consent for the following areas in which you may be photographed or filmed: please be aware that if your photograph has been published to other people in print (e.g. a newsletter, the Strathallian magazine, a formal school photograph), it cannot be removed or recalled.
- b) The Marketing Department may photograph you or make video recordings of you for publicity purposes. You have the right to ask not to be photographed or filmed, and to ask for existing photographs or films not to be used if you appear in them. You should note that this may be affected by the rights of other people if they also appear in the photograph or video.
- c) Teachers record their teaching from time to time in order to review their classroom practice with a colleague. Pupils will be told that this is happening on each occasion. The recordings will usually be deleted after the teacher has completed the exercise, but examples of particularly good classroom teaching may be retained for staff training. You may wish to withhold your consent for the recording to be retained for staff training, but we do need to make the recordings in the first place.
- d) Sports Coaches may record performance, as may Dance and Drama staff. You will know that this is happening. For top-level sports teams the recordings may be uploaded to the CoachLogic website so that you, other team members and other Strathallan coaches can see them. They will be removed and deleted at the end of the season. You will need to give your consent for this.
- e) School, House, Team and other formal group photographs are taken each year and are sold to the people appearing in the photograph as well their parents. If you do not wish to appear in a particular photograph you should say so beforehand. Once the photograph has been finished, you cannot ask to be removed from it since we have no control over the people who have paid for a copy. The School will usually keep a copy of all such photographs for the Archives and for display.
- f) Your Houseparent will take photographs of you and the members of your House, and these will be displayed in the House. You can ask your Houseparent not to keep or display any or particular photographs of you.



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- g) General photography and video recordings of school activities: Trips, outings and social events will often be recorded on film. Again, you can decline to give your consent for this and in many instances (unless the photograph has been published), you can ask for it to be removed if you are the only person appearing in it.
- h) Your use of a camera of any kind in School is also covered in the School Rules and in the Policy on Taking, Storing and Using Images of Pupils.

16) Your rights relating to your personal data

You need to know that we are dealing with your data in order to fulfil a legal contract made between the School and your parents, and that this may limit our ability to meet all of your rights. If you need any help in understanding your rights or if you wish to ask for access to the data which you cannot already see, you should ask.

- a) You have the right to know why the School needs to process your personal data and what we do with it: *this has been explained earlier in this document.*
- b) You have certain rights to see most (not necessarily all) your personal data, *but you do not have the right to see the data of other people.*
- c) You should tell us if the information we have is not accurate: *we will correct it.*
- d) You have the right to know how long we will keep your personal data and to know that it will be deleted once it is no longer needed. *This has been explained earlier in this document.*
- e) You have the right to data portability: this means if you request it, the data will be given to you in a commonly used digital format from which the information can be extracted. *This is limited to the personal data which was supplied by you or your parents, so it does not include many documents.*
- f) You have the right to ask us not to use your personal data for direct marketing or for scientific or historical research. *We do not use for pupils' data for these purposes.*

17) Asking for access to your data (Subject Access Request)

You can make subject access requests for your own personal data, provided that, in the reasonable opinion of the school, you have sufficient maturity to understand the request you are making. You may ask a parent or other representative to make a subject access request on your behalf, and we would ask you to consult your parents before making the request. You should understand that you may not have a right to see all of the data which the School holds about you and that much of the data is already available to you. If you do make a Subject Access Request, the School will provide the data which it is allowed to give you, no more than 30 days after making sure of your identity and of your right to receive the data.

You and your parents will be able to see much of your record live and at any time, via the Pupil and the Parent Portal. The Parent Portal shows your parents' address and contact details; both portals show your reports, Orders, timetable, Merits, Commendations, extracurricular programme, exam entries, exam results and exam access arrangements. Your involvement in sports fixtures can be seen at any time by using the School's SOCS website service. You are also able to view your record using the Pupil Portal, Firefly and SOCS.

18) Complaints

If you have a complaint about how the School is dealing with your personal data, you can approach any member of the teaching staff, or contact Mr Streatfeild-James directly.



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If you are not satisfied with the School's response to your concerns, you can complain to the ICO (Information Commissioner's Office: [this link will take you to their Complaints page](#)).

This Policy was updated on the 17th May 2018