

# **Client and Pupil Privacy Notice**

St George's Educational Services is committed to protecting the privacy and security of personal information. This privacy notice describes how we collect and use personal information about pupils, in accordance with the General Data Protection Regulation (GDPR).

#### Who Collects This Information?

St George's Educational Services (the Company) is an education service provider which provides education services for clients.

We are a "data controller", which means that we are responsible for deciding how we hold and use personal information about pupils and clients (including parents, as well as data provided by schools and local authorities).

## The Categories of Personal Information That We Collect, Process, Hold And Share

We may collect, store and use the following categories of personal information about you: -

- Personal information such as name, pupil number, date of birth, gender and contact information.
- Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses.
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility).
- Attendance details (such as sessions attended, number of absences and reasons for absence);
- Financial details (to ensure effective payment is made)
- Performance and assessment information.
- Behavioural information (including exclusions).
- Special educational needs information.
- Relevant medical information.
- Special categories of personal data (including relevant medical information and special educational needs information).
- Recordings of pupils and/or parents from the Company's video conferencing platform.
- Information about the use of our IT, communications, and other systems, and other monitoring information.

#### **Collecting This Information**

• Whilst most of the information you provide to us is mandatory, some of it is provided to us on a voluntary basis. To comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain information to us or if you have a choice in this. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.



### How We Use Your Personal Information

We hold personal data and use it for: -

- Providing education services and extra-curricular activities to pupils, and monitoring progress and educational needs.
- To provide tutoring and educational services as agreed.
- Assessing performance and to set targets.
- Safeguarding pupils' welfare and providing appropriate pastoral (and where necessary medical) care.
- Support teaching and learning.
- Giving and receiving information and references about past, current and prospective pupils and to provide references.
- Managing internal policy and procedures.
- Enabling pupils to take part in assessments and to record pupil achievements.
- To carry out statistical analysis for diversity purposes.
- Legal and regulatory purposes (for example child protection, health and safety) and to comply with legal obligations and duties of care.
- Enabling relevant authorities to monitor performance.
- Monitoring use of the Company's IT and communications systems in accordance with the Company's IT security policy.
- Making use of photographic images on social media and on the website.
- Security purposes and where otherwise reasonably necessary for the Company's purposes, including to obtain appropriate professional advice and insurance.

## The Lawful Basis on Which We Use This Information

We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances: -

- Consent: the individual has given clear consent to process their personal data for a specific purpose.
- Contract: the processing is necessary for a contract with the individual.
- Legal obligation: the processing is necessary to comply with the law (not including contractual obligations).
- Vital interests: the processing is necessary to protect someone's life.
- Public task: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law; and
- Legitimate Interests the processing is necessary for the purposes of the Company's legitimate interests (or a third party\_ provided those interests are not overridden by the rights and freedoms of the data subject.



We need all the categories of information in the list above primarily to allow us to comply with legal obligations. Please note that we may process information without knowledge or consent, where this is required or permitted by law.

#### Sharing Data

We may need to share your data with third parties where it is necessary. There are strict controls on who can see your information. We will not share your data if you have advised us that you do not want it shared unless it's the only way we can make sure you stay safe and healthy or we are legally required to do so.

We share pupil information with: -

- Local Authorities;
- The school attended by the pupil;
- NHS;
- Welfare services (such as social services);
- Law enforcement officials such as police, HMRC;
- Local Authority Designated Officer;
- Professional advisors such as lawyers and consultants;
- Support services (including insurance, IT support, information security);
- Providers of learning software; and
- Government Agencies.

Information will be provided to those agencies securely or anonymised where possible.

The recipient of the information will be bound by confidentiality obligations; we require them to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

#### **Storing Data**

The Company keep information on computer systems and sometimes on paper.

Except as required by law, the Company only retains information for as long as necessary in accordance with timeframes imposed by law and our internal policy.

#### Security

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). We hold an ICO registration certificate as required by law.



#### **Requesting Access to Your Personal Data**

Under data protection legislation, data subjects (including parents and pupils) have the right to request access to information about them that we hold. You also have the right to: -

- Object to processing of personal data that is likely to cause, or is causing, damage or distress.
- Prevent processing for the purposes of direct marketing.
- Object to decisions being taken by automated means.
- In certain circumstances, have inaccurate personal data rectified, blocked, erased, or destroyed; and
- Claim compensation for damages caused by a breach of the data protection regulations.

If you want to exercise any of the above rights, please contact Helen Sanderson at office@stgeorgeseducation.com

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

#### **Right To Withdraw Consent**

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Helen Sanderson at office@stgeorgeseducation.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

#### Contact

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with Helen Sanderson at office@stgeorgeseducation.com in the first instance.

You have the right to make a complaint at any time to the Information Commissioner's Office, the

UK supervisory authority for data protection issues at https://ico.org.uk/concerns

#### **Changes To This Privacy Notice**

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

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