1. General principles
1.1 The Grammar School at Leeds ("GSAL", "the school") is a data controller with registered address at Alwoodley Gates, Harrogate Road, Leeds, LS17 8GS and is committed to ensuring that the personal data of all pupils and their parents/carers is handled in accordance with the principles set out in the General Data Protection Regulation (Regulation 2016/679 EU) (GDPR).
1.2 GSAL will process information in accordance with the Data Protection Act 2018 and its own Data Protection and Data Retention Policy. To comply with the law, data must be collected and used fairly, stored safely and securely, be adequate, relevant and not excessive, be kept accurate and up to date, held only as long as necessary and not disclosed to any third party unlawfully.
1.3 This policy applies to prospective, current and former pupils and their parents/carers.
1.4 This policy describes the categories of personal data that we collect, how we use and secure your personal data, and when we may disclose your personal data to third parties. It also describes your rights regarding your personal data and how you can access, correct, and request erasure of your data.

2. What information do we hold?
2.1 Personal data are normally initially provided to the school by a prospective pupil and their parents/carers from the point of enquiry, and subsequently on an online or paper-based application form and is added to over the course of their time at the school.
2.2 We may collect, store, and process the following categories of personal data about you:
2.2.1 personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
2.2.2 date of birth;
2.2.3 equal opportunities monitoring information (including racial or ethnic origin, religious beliefs, disabilities, sexual orientation, criminal convictions and offences);
2.2.4 emergency contact information and details about parents/carers;
2.2.5 copies of identification and pupil ID photos;
2.2.6 parental bank account details;
2.2.7 parental wage and benefits information;
2.2.8 data relating to academic performance (such as exam result data; internal assessment data; school reports; individual needs assessments and reports; etc.);
2.2.9 photographic images, CCTV footage, video and audio recordings recordings;
2.2.10 health, medical and attendance information;
2.2.11 disciplinary records;
2.2.12 safeguarding and pastoral information;
2.2.13 other personal details included in an application form, or other information that you otherwise voluntarily provide to us.

3. Why do we process personal data?
3.1 The processing of personal data by GSAL includes the following purposes:
3.1.1 To carry out our activities and obligations as a school and to fulfil our pupil recruitment processes,
3.1.2 Managing pupil application and recruitment processes (including bursary applications).
3.1.3 Managing attendance and monitoring school activities and participation.
3.1.4 Managing and monitoring academic provision and outcomes (including individual pupil progress; overall school monitoring processes; examination results; pupil reports; etc.)
3.1.5 Providing communications about GSAL news and events, such as through GSAL world.
3.1.6 Publicising and celebrating individual and school achievements, both internally and externally.
3.1.7 Pupil photographs are used on the school intranet system, catering and transport systems and SIMS for the purposes of identification and security. The school may occasionally commission photographs or video images around school at specific school events or on the school’s social media and web platforms.
3.1.8 GSAL may monitor computing use through user names and login details to ensure adherence to the Pupil Acceptable Use Policy.
3.1.9 Maintaining contact with former pupils (see also ‘Alumni Privacy Notice’).
3.1.10 Provision of pastoral and safeguarding services to pupils (including pupil health and medical provision).
3.1.11 Compliance with legal and statutory obligations such as for school inspections and information provided to the DfE.
3.1.12 Responding to and defending legal claims.

3.2 The lawful basis for processing includes the fulfilment of our contractual or legal obligations (including our contract with you to provide educational services), the legitimate interests of the school (including the efficient running and promotion of the school, processing financial transactions) or third parties or on the basis of consent.

3.3 **Collection and use of special categories of personal data**
We may collect and process special categories of personal data where it is necessary for the purposes of performing or exercising our obligations or rights and industry obligations, for health purposes, in relation to equal opportunity treatment, for the identification and celebration of achievements within a targeted demographic (based only on explicit consent), and for preventing or detecting unlawful acts. Such special categories of personal data may include:

3.3.1 Information about pupil’s racial and ethnic origin; sexual orientation; religion, beliefs and disability information to ensure meaningful equal opportunity monitoring and reporting;
3.3.2 physical or mental health data or disability status to ensure safety in the school environment, provide appropriate adjustments and to make decisions regarding school provision and ability to meet needs;
3.3.3 segregation of school databases for the purposes of monitoring and (with explicit consent) disclosure to the media;
3.3.4 Managing a safe environment and determining appropriate provision for pupil health and wellbeing needs.

4. **Who has access to your data?**
4.1 Your personal data will be stored securely and may be accessed by staff who legitimately need the information to carry out their duties, including those in finance, computer services, pastoral teams and the academic staff. The amount of personal information shared within GSAL will be no more than is reasonably necessary.

4.2 The school shares pupil and parent/carer data with third parties where this is necessary to facilitate and/or promote school operations or to fulfil our legal obligations, or in pursuit of our legitimate interests or those of third parties. Examples include (but are not limited to):
4.2.1 the running of clubs and school events/fixtures (examples may include the MOD, other schools, the scouts or girl guides associations, orchestras);
4.2.2 operating the school’s management information systems (examples may include providers of IT services);
4.2.3 providing education services (examples may include where we may use photographs or video recordings of pupils in drama, sports, etc. lessons);
4.2.4 managing behaviour (examples may include sharing information about behaviour with parents);
4.2.5 organising trips and visits (examples may include travel companies, tour operators, airlines, attractions etc.);
4.2.6 promoting the school and the pupils within it (examples may include the media and social media, magazines, advertisements etc.);
4.2.7 examination and competition entries (examples may include examination awarding bodies or competition judges);
4.2.8 higher education and work experience facilitation (examples may include employers, universities and colleges);
4.2.9 ensuring the safeguarding of pupils (examples may include the local authority, social and health services, the health and safety executive, the emergency services, courts, our professional advisors, insurance companies etc.);
4.2.10 official and government agencies (examples may include the Department or Education, HMRC, school inspectors or auditors etc.); and
4.2.11 provision of catering and transport services.

5. Do we transfer your personal data to other countries?
   We do not envisage transferring your personal data outside of the European Economic Area other than in specific instances (such as international trips, or international university applications). In such cases the school will ensure that appropriate safeguards are in place (such as the use of standard contractual clauses provided by the European Commission for such purposes, adequacy decisions, and/or certification under the EU-US Privacy Shield) along with information about those safeguards. Often, consent will be obtained from the individual for such transfers.

6. How does the school protect your personal data?
   6.1 The school takes the security of your data seriously. Internal policies and controls have been put in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.
   6.2 Where the school engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

7. For how long does the organisation keep data?
   7.1 Information about pupils and their parents/carers is retained only for as long as it is necessary to fulfil the purposes it was collected for and is disposed of in accordance with the school’s Data Retention Policy. Information about pupils and their parents/carers is retained until the year of their 25th birthday after which only sufficient information is retained to allow the school to operate its alumni program.

8. Your rights
   The GDPR has provided for data subject rights which include:
   8.1 **Right of Access** – You have the right of access to information we hold about you. We have up to one month to provide you with the information and at no cost to you. We will provide you with a copy of the information we hold that relates to you. For more information, please see our Data Subject Access Right Policy and Procedure.
8.2 **Right to rectification** – You have the right to have inaccurate information about you rectified, or incomplete personal data to be completed.

8.3 **Right to Restriction of processing** – you have the right to request that we refrain from processing your data where you contest its accuracy, the processing is unlawful, where we no longer need the data but you require us to keep it for legal purposes or where we are considering any legitimate interest we may have for processing your personal data.

8.4 **Right to object** – you have a right to object to our processing of your personal data where the basis of the processing is our legitimate interests

8.5 **Right to data portability** - you have a right to receive any personal data that you have provided to us in order to transfer it onto another data controller where the processing is based on consent or performance of a contract and is carried out by automated means. This is called a data portability request.

8.6 **Rights related to automated decision-making, including profiling** – you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

8.7 If you would like to exercise any of these rights, please contact Data Protection Officer, Data Protection People at [dpo@gsal.org.uk](mailto:dpo@gsal.org.uk) (or by post to Data Protection People ‘care of’ Neal Parker, Grammar School at Leeds, Alwoodley Gates, Harrogate Road, Leeds, LS17 8GS). For internal queries regarding this Privacy Notice, you can contact Neal Parker at [ntp@gsal.org.uk](mailto:ntp@gsal.org.uk).

8.8 More information about your data protection rights can be found on the Information Commissioner’s Office (ICO) website (see link below). You also have a right to lodge a complaint about any aspect of how we are handling your data. You can do this by contacting the ICO at the address below:

- Information Commissioner's Office
- Wycliffe House
- Water Lane
- Wilmslow
- Cheshire SK9 5AF
- T: 0303 123 1113 | [www.ico.org.uk](http://www.ico.org.uk)

9. **Withdrawing consent**

Where you have provided your consent to the collection, processing and transfer of your personal data, you may withdraw that consent at any time. This will not affect the lawfulness of data processing based on consent before it is withdrawn. To withdraw your consent please contact [dpo@gsal.org.uk](mailto:dpo@gsal.org.uk)

10. **What if you do not wish to provide personal data?**

10.1 The school may require you to provide data in order to fulfil its contractual or legal obligations, or in order to provide suitable care for pupils. Failing to provide the data may mean that the school is unable to fulfil these requirements, which may lead to pupil exclusion from specific events or elements of provision, or else more generally.

10.2 Certain information, such as contact details, employment details, have to be provided to enable the school to effectively administer pupil applications. If you do not provide this information, the school will not be able to progress an application to attend GSAL.

11. **Changes to this Privacy Notice**

11.1 We may change this Privacy Notice from time to time. Any significant changes to the terms will be published on the school’s website and you will be notified of such changes. This notice was last updated in October 2018.