

Privacy Policy

Who We Are?

The Compass School ("The School") is managed by a Board of Governors, and is a registered Scottish Charity (SC 020370). The School's address is The Compass School, 11 West Road, Haddington, East Lothian EH41 3RD.

The Compass School, as a Data Controller, is committed to protecting your personal information. In order to do this, it is important that we explain:

What information do we collect about you?

Your relationship(s) with us (as a pupil, parent, member of staff or volunteer), will have an impact on the answers to each of these questions and so we have separated the information we may need out into a matrix based on the type of activities and interactions you may have with us. The information we may hold, by relationship you have with the School, is listed in the matrix attached at Annex A.

Why we collect this information?

Parents and Pupils: This information allows us to better understand who your child is, whether we can accommodate their needs and whether a Compass education would be best for them. This also enables us to communicate with you throughout the admissions process, as pupils progress through School and as they transition to future schools and beyond.

Staff: This information allows us to carry out a fair recruitment process, progress your application, arrange interviews, make informed decisions, and inform you of the outcome of the process. It also allows us to comply with our legal and equal opportunities obligations, ensure equality of opportunity and treatment, maintain employment records and verify your qualifications. The information ensures that we can manage and communicate with our staff effectively; 'Staff' includes peripatetic, volunteer staff and members of the governing board.

What we need from you?

We need your consent for your child's current school or nursery to release academic reports and pupil profile information, and to share financial information in relation to applications for financial support. The information we may require is listed at Annex A.

We will only contact you using the methods you have provided us with during the Admissions process.

You can withdraw your consent to us collecting and/or storing your personal information at any time. You can withdraw your consent by contacting us using the details at the end of this privacy policy.

How do we collect that information?

Parents and Pupils: We will collect information from you from the first time you make an enquiry, you may call to ask a question of our Admissions team, you may attend an Open Day, ask us to send our Prospectus out to you, or you may apply for a place, and fill in our application form or complete market research surveys that we may conduct from time to time (either on paper or online). Your child's current nursery or school may also be asked to provide information.

Staff: Staff will provide us with much of the information we need in their application form or CV, anonymised diversity monitoring forms, the health questionnaire, and induction information. We may also collect information from any relevant professional bodies, pension administrators, health and occupational health professionals, Disclosure Scotland, and the Home Office.

For grievances, conduct or capability issues, disciplinary action, appraisals, performance reviews and management/improvement plans we will collect information from you, your line manager, other employees and any consultants we engage with, in relation to the relevant process.

Information on your use of our IT, communication and other systems will be gained from monitoring of our systems (e.g. websites, browser history, email, telephones and voicemail messages) in accordance with the **Electronic Communications Policy**. Use of social media may be collected from the websites and applications.

What we do with that information?

The information enables us to carry out our statutory and legal obligations for the delivery of educational services, quality control, liaison with parents, pupils and staff and to manage the School to high professional standards. Typically this will enable us to:

- Invite your child to an informal assessment
- Send further information, if requested
- Communicate with you throughout the admissions process
- Assess your child, and determine if they will fit into The Compass School
- Monitor and report on pupils' progress within the School,
- Liaise with future Schools on the education progress of pupils,
- Analyse feedback for market research purposes, after the offers have been sent out, and places accepted or rejected.
- Maintain employment records and to comply with our legal, regulatory, governance and equal opportunities obligations, and ensure safe working practices
- Monitor and manage staff access to our systems and facilities; to protect our networks, and the personal data of employees, pupils and customers against unauthorised access or data breach
- Ensure adherence to our policies, such as those concerning security and system use
- Ensure that commercially sensitive information is kept confidential
- Carry out Disclosure Scotland checks and investigate complaints and allegations of criminal offences
- Undertake or cooperate with investigations by regulatory bodies, or in connection with legal proceedings or requests.

- We may share information with external agencies for the purposes of Child Protection and Welfare, for the administration of our statutory obligations such as HMRC payments and contract obligations such as pension administration.

Who do we share information with?

We will never sell and will not share your personal information with any third-party unless we are required to do so in order to meet regulations or legal requirements. These are likely to include: HMRC, Disclosure Scotland and other regulatory authorities, the Police, the Home Office, Care Inspectorate and any relevant professional bodies (such as GTCS), our insurers, accountants and pension administrators; this list is not exhaustive.

On occasion, we may need to share some personal information with external contractors or our professional advisers, where possible we will anonymise the information but this may not always be possible. However, the recipient of the information will be bound by confidentiality obligations.

Information on pupils' abilities, and reports, may be shared with future schools they may attend after their time at The Compass; for staff, references can be supplied to future employers, however the staff member concerned must agree with the appropriate manager from the School that they are content to supply such references.

How long do we keep your information?

Should an application as a pupil or as a member of staff be unsuccessful we will destroy your information within one year following the end of the Academic Year for which a pupil applied; in the case of a member of staff this will be reduced to a six month period.

Should a pupil be placed on a waiting list we will retain your information until the process has closed, then destroy after the end of the Academic Year for which you applied.

Should a pupils application be successful, records will be kept for the duration of your child's education with the School, and potentially beyond in accordance with our data retention policies. Certain information, such as that which may pertain to legal or insurance enquiries may have to be held indefinitely.

We keep staff information throughout your time with us and for seven years after your employment.

Please be aware that we may have to retain a minimal amount of personal data for legal, historical and statistical purposes. If there is a clear business reason for keeping personnel records for a longer period, we will consider whether the records can be anonymised.

Former pupils and members of staff will be invited to allow us to retain contact information in order to keep in touch with them and keep them updated on School activity; information of a sensitive personal nature will not be retained in these circumstances.

How can you access the information we hold on you?

You have the right to access the personal information we hold on you. If you wish to receive a copy you may make a data subject access request to our Data Protection Officer, the Bursar.

We must confirm your identity before we can release any personal information.

If the personal information is inaccurate or incomplete, you can ask us to correct it. You can also ask for information to be deleted or removed if there is no compelling reason or legal obligation for The Compass School to continue to hold it.

Where do we process and store your information?

The personal information collected by the School will be held in electronic and/or physical format on secured systems within the European Economic Area. We will not knowingly transfer your personal information outside of the European Economic Area. We only store physical copies of documents containing your personal information on the School's premises. Information that we store electronically is retained on systems owned and/or managed by the School.

We may need to make changes to our Privacy Policy, which will be updated on the website from time to time. However, should there be any important changes we will let you know. Any changes to our Privacy Policy will come into effect 30 days after we post it on our site. During that period, you're welcome to contact us if you have questions about the changes.

How to Contact Us

If you have any questions, comments or requests regarding this Privacy Policy please contact:

The Bursar / Data Protection Officer
The Compass School
11 West Road
Haddington
East Lothian
EH41 3RD

Or

office@thecompassschool.co.uk

or

01620 822 642

Complaints

If you are not satisfied with the way that we have handled any of your requests or questions relating to our use of your personal data then you can contact the Information Commissioner's Office at www.ico.org.uk/concerns or phone 0303 123 1113.

The Information Commissioner's Office is the statutory body responsible for overseeing data protection legislation and law in the United Kingdom.

GDPR - INFORMATION HELD BY THE SCHOOL

Annex A to
Privacy Policy
26 Nov 2018

| PUPILS | Enquiry | Current Pupil and admission applicant | Former Pupil |
|---|----------------|--|---------------------|
| Name | x | x | x |
| Address | x | x | x |
| Date of Birth | x | x | x |
| Parent/Carer Contact Details | x | x | x |
| Personal Contact Details | | | x |
| Additional needs including SFL and Disabilities | x | x | x |
| Health - Allergies | | x | |
| Health - Medical Conditions | | x | |
| Attendance Monitoring | | x | |
| Absence Monitoring | | x | |
| Start Date | x | x | x |
| Leave Date | | x | x |
| Previous School | x | x | x |
| Sibling Details | x | x | x |
| Gender | x | x | x |
| Doctor's details | | x | |
| Health Visitor Details | | x | |
| SCN Number | | x | x |
| Future School (s) | | x | x |
| Performance Reports | x | x | x |
| Birth Certificate / proof of ID | | x | |
| Employment Details | | | x |
| Nationality | | x | x |

| PARENTS (of pupils) | Prospective Pupils | | | Current Pupils | In receipt of Financial Support | Former Pupils |
|--|--------------------|------------|----------------|----------------|---------------------------------|---------------|
| | Enquiry | Registered | Accepted Offer | | | |
| Name | X | X | X | X | X | X |
| Address | X | X | X | X | X | X |
| Telephone Contact (s) | X | X | X | X | X | X |
| Emergency Contact (s) | | | X | X | X | |
| E-mail Address | X | X | X | X | X | X |
| Occupation | | X | X | X | X | |
| Marital Status | | X | X | X | X | |
| Children and Siblings | X | X | X | X | X | X |
| Bank Details | | | | x | X | |
| Court Restriction Orders | | X | X | X | X | |
| Financial Assistance applications | | | x | | x | |
| Information on parents' Earnings and Assets (if FS is applied for) | | | x | | x | |

| MEMBERS OF STAFF | Governors | Current Employees | Former Staff | Peripatetic Staff | Casual Staff | Applicants |
|---|-----------|-------------------|--------------|-------------------|--------------|------------|
| Name | X | X | X | X | X | X |
| Address | X | X | X | X | X | X |
| Date of Birth | X | X | | X | X | |
| E-mail Address | X | X | X | X | X | X |
| Telephone Contact | X | X | X | X | X | X |
| Name, relationship and tel of Emergency Contact | | X | | X | X | |
| Bank Details | | X | | X | X | |
| Health - Allergies | | X | | X | X | |
| Health - Medical Conditions | | X | | X | X | |
| Attendance Monitoring | | X | | X | | |

| | | | | | | |
|---|---|---|---|---|---|---|
| Absence Monitoring | | X | | X | | |
| Start Date | X | X | X | X | X | |
| Leave Date | X | X | X | X | X | |
| Salary Details | | X | X | X | X | |
| National Insurance Number | X | X | X | | X | X |
| Criminal Record and PVG Record | X | X | X | X | X | X |
| Qualifications | | X | X | X | X | X |
| Registered Body Details | | X | X | X | X | X |
| Drivers Licence Details | | X | | | | X |
| Passport Information | | X | | | | X |
| HR information, including grievances, sickness absence, disciplinary procedures | | x | x | x | x | |
| Performance Review | | X | | | | |
| Entitlement to work in UK | | X | | X | X | X |
| References | | X | X | X | X | |
| Photograph | | x | | x | | |
| Nationality and immigration status | | x | | x | x | x |
| Pension Details | | x | x | x | x | |
| References | x | x | x | x | x | x |
| Use of Social Media | | x | | | | |
| Use of School IT, Communications and other systems | | x | | | | |