Privacy Notice - Video Conferencing Tools

Introduction

We are continuously committed to protecting and respecting the privacy of our parents, pupils and our staff regardless of whether our learning environment is onsite or online. We may consider it necessary or desirable to provide online education via a Video Conferencing Tool (VCT).

Please read this supplementary privacy notice in conjunction with the Parent Privacy Notice, the Pupil Privacy Notice, the Staff Privacy Notice, the Alumni Privacy Notice and the School's CCTV Privacy Notice ("Existing Notices").

This supplementary notice (together with the Existing Notices) sets out the basis on which any personal data we collect from parents, staff and pupils is handled by us when taking part in the VCT.

Uses made of the information

To ensure that educational content is presented in the most effective manner, and our pupils' online experience is as appropriate as possible, delivery of educational services via a VCT will involve the processing of personal data, including in the following contexts:

- Pupils participating in live, online, face-to-face interactive lessons and tutorials with other pupils and teachers
- Pupils participating in live video calls and tutorials with other pupils and teachers online chat services
- One-on-one sessions between teachers and pupils in specific cases, within school
- Pupil to pupil interaction, within school
- Peer review: teachers reviewing other teachers' lessons for quality assurance.

Additionally, to ensure that professional meetings are able to happen in a safe manner a VCT may be used to facilitate communications in the following contexts:

- Staff participating in live video calls with other staff
- Staff participating in live video calls with families
- Staff participating in live video calls with other professionals
- Recordings being made by the School and stored on a device such as a school laptop or desktop computer ("Recordings"), such as part of the school's INSET activity.

Basis of processing

The School's processing of personal data via the VCT is necessary for its legitimate interests, which in this context includes the following purposes:

- To deliver educational services to our pupils and to monitor pupils' progress and educational needs;
- To promote and fulfil the objects and interests of the School and ensure its efficient management and administration; and
- To safeguard our children's welfare and provide appropriate pastoral care.

Some of this activity undertaken via a VCT the School will need to carry out in order to fulfil its legal rights, duties or obligation – including those under a contract with its staff, or parents of pupils.

Third-party software platforms

We use third party software platforms including, but not limited to; Teams, Zoom and Google Classroom. Please also read the privacy notices, and applicable terms and conditions, provided by any such third parties. The third party notices will set out the data collection, use, and retention for the service they are providing. This notice only sets out how the School uses personal data for the use of VCT.

Changes to this policy

The School reserves the right to update this supplementary notice at any time. You will be notified of any material change.

How long we keep personal information

The Recordings shall be retained by the School no longer than necessary, for the purpose it was created for, and thereafter in accordance with the School's Retention Policy.

Your rights

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our data protection lead Matt McArthur - Assistant Headteacher - Tel: 01295 263520, or our data protection officer at gdpr@turniton.co.uk.

Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection lead, Matt McArthur - Assistant Headteacher - Tel: 01295 263520 or our data protection officer at gdpr@turniton.co.uk.

Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection lead Matt McArthur, Assistant Headteacher Tel: 01295 263520, or our data protection officer at gdpr@turniton.co.uk.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at https://ico.org.uk/concerns/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection lead Matt McArthur - Assistant Headteacher - Tel: 01295 263520 or our data protection officer at <u>gdpr@turniton.co.uk</u>

Reviewed by: Matt McArthur

Date: February 2023

Approved by Governors:

Date: February 2023

