

KING EDWARD'S SCHOOL, BATH – PRIVACY NOTICE

Introduction

This Notice applies to parents and pupils at the School, prospective parents and alumni.

We are committed to protecting your personal information and being transparent about what information we hold.

Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.

This notice is to help you understand how and why we collect personal information about you and what we do with that information. It also explains the decisions that you can make about your own information.

If you have any questions about this notice please contact the Assistant Head and Information Compliance Lead (ICL): Mr A Bougeard.

What is personal information?

Personal information is information that identifies you as an individual and relates to you.

Types of personal data processed by the School

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (of those who use our car parking facilities).
- bank details and other financial information, eg about parents who pay fees to the school and staff payroll information.
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks.
- where appropriate, information about individuals' health and contact details for their next of kin.
- references given or received by the school about pupils, and information provided by previous educational establishments and/or other professionals or organisations working with pupils.
- images of pupils (and occasionally other individuals) engaging in school activities, and images captured by the school's CCTV system (in accordance with the school's policy on taking, storing and using images of children).
- special category data (see page 3).

Why the School needs to process types personal information

In order to carry out its ordinary duties to staff, pupils and parents, the school may process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of its daily operation.

The school will need to carry out some of this activity to fulfil its legal rights, duties or obligations – including those under a contract with its staff, or parents of its pupils.

Other uses of personal data will be made in accordance with the school's legitimate interests, or the legitimate interests of another.

In addition, the school may need to process **special category personal data** (concerning health, ethnicity, or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so: for example, for medical advice, social services, insurance purposes or to organisers of school trips;
- To provide educational services in the context of any special educational needs of a pupil;
- In connection with employment of its staff and volunteers, for example DBS checks, welfare or pension plans; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

How and why does the school collect, generate and use personal information?

We set out below examples of the different ways in which we use and generate personal information and where this personal information comes from. The School's primary reason for using personal information is to provide educational services to children.

This will include by way of example:

- We obtain information from admissions forms and from a child's previous school. We may also obtain information from professionals such as doctors and from local authorities.
- We may have information about any family or personal circumstances which might affect a child's welfare or happiness, eg from Social Services.
- We may need information about any relevant court orders or criminal petitions so that we can safeguard the welfare and wellbeing of pupils at the School.
- We generate information ourselves, eg academic records, reports and notes of meetings.

- We may take photographs or videos at School events to use on social media and on the School website. This is to share news with the School community and prospective parents, as well as to advertise the School. We may continue to use these photographs and videos after a child has left the School.
- We use CCTV to make sure the school site is safe. CCTV is not used in private areas such as toilets.
- We may send you information to keep you up to date with what is happening at the School. For example, by sending you the School e-newsletters, which provide news and information about events taking place (including fundraising activities).
- We keep details of parental and former pupil addresses when a child leaves the School so we can send alumni and School communications. Further information on the alumni programme can be found on our website.
- We may use information about individuals if required for historical research purposes or for statistical purposes.

Financial information

- We will process financial information, such as in relation to the payment of fees and salaries. In some cases, we obtain information from third parties such as credit reference agencies or from a child's previous school(s).

Sharing personal information with third parties

- In order to provide educational services, we share information with external agencies, for example, examination boards, UCAS, Department for Education, Independent Schools Inspectorate (ISI).
- In accordance with Data Protection Law, some of the school's processing activity is carried out on its behalf by third parties, such as IT systems providers, web developers, cloud storage providers or mailing houses.
- In accordance with our legal obligations, we may share information with local authorities, the Independent Schools Inspectorate, and the Department for Education, police and other appropriate authorities, for example, where we have any safeguarding concerns.
- We may also need to share information with our legal advisers for the purpose of obtaining legal advice.
- Occasionally we may use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We might need to share your information with them if this is relevant to their work.
- If a child is not of British nationality we have to ensure that the child has the right to study in the UK. We may have to provide information to UK Visas and Immigration to comply with our duties as a Tier 4 sponsor.
- We may share some information with our insurance company, for example, where there is a serious incident at the School.
- If a child leaves us to attend another school we may need to provide that school with information. Examples include, attendance, academic achievements, and details of personal circumstances for safeguarding reasons.

- We may share information about you with others in your family, such as a parent, step-parent. For example, where this is part of our obligation to take care of a child, as part of our wider legal and regulatory obligations, or in connection with school fees.
- We may need to share information if there is an emergency, for example, if an individual is hurt whilst on School premises.

For how long do we keep your information?

We will only retain your and your child's data for as long as is necessary. We keep information for as long as we need to in order to educate and look after children at the school. We will keep some information after a child has left the School, for example, for providing employment references, for confirming academic records, for keeping in touch through the alumni and former parents' programme.

In exceptional circumstances we may keep your information for a longer time than usual but we would only do so if we had a good reason and only if we are allowed to do so under data protection law. In some circumstances we may anonymise personal information so that it can no longer be linked to you. If we do this, we may use such information without telling you.

We can keep information indefinitely if we need this for historical, research or statistical purposes. For example, to provide an historical record of the school.

Data security

We protect the security of your information.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only use your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Your duty to inform us of changes

If you move house or your personal details change, it is important that you let us know so that the information we hold is accurate.

What decisions can you make about your information?

From 25 May 2018 data protection legislation gives you a number of rights regarding your information. Some of these are new rights whilst others build on your existing rights.

Your rights are as follows:

- if information is incorrect you can ask us to correct it
- you can also ask what information we hold about you and be provided with a copy
- you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information
- you can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer
- our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.

Right to withdraw consent

Where you have told us that we can use your personal information, you can withdraw this consent at any time.

Changes to this Privacy Notice

We may update this Privacy Notice at any time, and we will make any revised Privacy Notice accessible to you. We may also notify you in other ways from time to time about the processing of your personal information.

Further information and guidance

If you are unhappy with how we are processing your personal information, you can make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Information Commissioner's Office website: <https://ico.org.uk/>

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