

Name of Policy:	Privacy Notice policy for all
Governor committee and last reviewed date:	Personnel /August 2021
Full Governing body approval date:	
Policy review timing:	3 years
Policy next review date:	August 2024

## Privacy Notice

**This document explains how we use personal data about members of the school community and what we do with it. This information is provided because Data Protection Law gives individuals rights to understand how their data is used.**

The Grey Coat Hospital is an Academy Trust. This means that the Academy Trust is the Data Controller. The registered address of the Academy Trust is not the school address, it is 57 Palace Street, SW1E 5HU. If you want to contact us about your personal information you can contact our Data Protection Officer, contact details for which are at the end of the document.

## Purpose of the privacy notice

This policy is intended to provide information about how the school will use, or process personal data about individuals including: staff current and past; pupils current, past and prospective; parents, carers or guardians current, past and prospective. Information on school governors past and present is also covered. This Privacy Notice applies alongside any other information the school may provide about a particular use of personal data, for example when collecting data via an online or paper form. Please note there are detailed privacy notices for Pupils, the School Workforce and those in Governance Roles.

This Privacy Notice also applies to the school's other relevant terms and conditions and policies, including:

- any contract between the school and its staff or the parents of pupils;
- the school's policy on taking, storing and using images of children and use of CCTV;
- the school's retention of records policy;
- the school's safeguarding and pastoral policies and how concerns or incidents are recorded; and
- the school's IT policies, including its Acceptable Use Policy.

Anyone who works for, or acts on behalf of, the school (including staff, volunteers, governors and service providers) should also be aware of and comply with this Privacy Notice and/or the School's Data Protection Policy which provides further information about how personal data about those individuals will be used.

## The need to process personal data

In order to carry out its ordinary duties to staff, pupils and parents, the school needs to process a wide range of personal data about individuals as part of its daily operation.

Some activities are needed in order to fulfil legal rights, duties or obligations and include 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, provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data.

The school expects that the following uses will fall within the category of "**legitimate interests**":

- For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents);
- To provide education services, including musical education, physical training or spiritual development, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law, including tax and diversity
- To enable relevant authorities to monitor the school's performance and to assist with incidents as appropriate;
- To give and receive information and references about past, current and prospective pupils, including to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the school;
- To safeguard pupils' welfare and provide appropriate pastoral care;
- To monitor use of the school's IT and communications systems in accordance with the school's ICT acceptable use policy;
- To make use of photographic images of pupils in school publications, on the school website and if appropriate on the school's social media channels in accordance with the school's policy on taking, storing and using images of children;
- For security purposes, including CCTV in accordance with the school's CCTV policy;
- Maintaining relationships with alumnae and the school community, including direct marketing or fundraising activities;
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests;
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

In addition, the school will on occasion need to process **special category personal data** 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, or from time to time by explicit consent where required. These reasons will include:

- To safeguard pupils' welfare and provide appropriate pastoral, and where necessary, medical support and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs;
- To provide educational services in the context of any special educational needs of a pupil;
- To provide spiritual education in the context of any religious beliefs;
- In connection with employment of its staff, e.g. DBS checks and pension plans;
- As part of school or external complaints, disciplinary or investigation processes that involves such data;
- For legal and regulatory purposes including child safeguarding and protection, diversity monitoring, health and safety reporting and to comply with its legal obligations and duties of care.

## Personal data processed by the school

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- bank details and other related financial information for student bursary payments;
- bank details for payroll;
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records, examination and marks;
- personnel files, in connection with employment or safeguarding;
- information about individuals' health and welfare, and contact details for their next of kin;
- references given or received by the school about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- correspondence with and concerning staff, pupils and parents past and present; and
- images of pupils and staff engaging in school activities, and images captured by the school's CCTV system

## How the data is collected

The school usually receives personal data from the individual directly, or in the case of pupils, from their parents.

In some cases personal data will be supplied by third parties such as another school, or other professionals or authorities working with that individual or it may be collected from publicly available resources.

## Access to personal data and sharing of personal data

From time to time the school will need to share personal information relating to its community with third parties, such as:

- professional advisers (e.g. solicitors, and accountants);
- government authorities (e.g. ESFA, DfE, HMRC, police or the local authority); and
- appropriate regulatory bodies

Personal data collected by the school will generally remain within the school, and will be processed by appropriate individuals only in accordance with access protocols on a need to know basis.

Staff, pupils and parents are reminded that the school is under duties imposed by law and statutory guidance, including Keeping Children Safe in Education, to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO or police. For further information about this, please view the school's Safeguarding Policy.

Finally, 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, web developers or cloud storage providers. Such activities are subject to contractual assurances that personal data will be kept securely and only in accordance with the school's specific directions. **Data retention**

The school will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Please refer to the Grey Coat Hospital Document Retention and Deletion Policy January 2020 for an individual breakdown.

## **Keeping in touch and supporting the school**

The school will use the contact details of parents, alumni and other members of the School community to keep them updated about the past, current and future activities of the school, including fundraising, by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the School will also share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the School community, such as The Grey Coat Hospital Parents' Guild and the United Westminster and Grey Coat Foundation.

The Grey Coat Hospital has been supported by the generosity of parents, former students and former governors for many years and a number of extra-curricular and enrichment opportunities would cease without such generosity. In order to continue to invest in our students, as well as our facilities, the school will collect and use personal data of members of our community to help us raise funds. As part of this process the school may also use third parties to undertake research on prospective supporters. These activities are designed to help understand the likely preferences of members of our current or past community as we aim to make requests appropriate to those willing to offer financial support. Such focused understanding will also enable the school to invite supporters to special events or activities that might prove of interest to them. In addition, we may gather information publicly available about residential location, wealth and assets.

The processing of information on potential donors in advance of contact is on the basis of our Legitimate Interest. If you wish to limit or object to any such use please contact the Bursar, [mholmes@gch.org.uk](mailto:mholmes@gch.org.uk). Please note that supporters always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising communications. Where this is requested there may be a need to hold some basic details to ensure that no further communications by post, email or telephone are made.

## **Rights of the individual**

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the school, and in some cases ask for it to be erased or amended or have it

transferred to others, or for the school to stop processing it – but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the Bursar, [mholmes@gch.org.uk](mailto:mholmes@gch.org.uk)

The school will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time limits.

The right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals or information which is subject to legal privilege.

The school is also not required to provide any confidential reference given by the school itself for the purposes of the education, training or employment of any individual.

The “right to be forgotten”. On some occasions there may be compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child’s) personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

## **Pupil requests**

Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the school, they have sufficient maturity to understand the request they are making. A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

Pupils aged 13 and above are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home. Slightly younger children may however be sufficiently mature to have a say in this decision, depending on the child and the circumstances. Please see The Grey Coat Hospital Privacy Notice For Pupils for more information.

## **Other requests**

Parents will receive educational and pastoral updates about their children. Where parents are separated, the school will in most cases aim to provide the same information to each person with parental responsibility, but may need to factor in all the circumstances including the express wishes of the child.

All information requests from, on behalf of, or concerning pupils – whether made under subject access or simply as an incidental request – will therefore be considered on a case by case basis.

## **Consent**

Where the school is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Please be aware however that the school may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this Privacy Notice, or may otherwise exist under some form of contract or agreement with the individual.

## Whose rights

The rights under Data Protection Law belong to the individual to whom the data relates. However, the school will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils. Where consent is required, it may in some cases be necessary or appropriate, given the nature of the processing in question, and the pupil's age and understanding, to seek the pupil's consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances. In general, the school will assume that pupils' consent is not required for ordinary disclosure of their personal data to their parents unless, in the school's opinion, there is a good reason to do otherwise.

However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the school may be under an obligation to maintain confidentiality unless, in the school's opinion, there is a good reason to do otherwise.

Pupils are required to respect the personal data and privacy of others, and to comply with the school's IT Acceptable Use policy and the school rules. Staff are under professional duties to do the same, as covered under the relevant staff policy.

## Data accuracy and security of data

The school will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals should contact the school where any significant changes to important information, such as contact details and addresses are held about them.

An individual has the right to request that information about them is erased or corrected, subject to certain exemptions and limitations under Data Protection Law.

The school will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

## Policy updates

The school will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

Data Protection Officer:  
Judicium Consulting Limited  
Address: 72 Cannon Street, London, EC4N 6AE  
Email: [dataservices@judicium.com](mailto:dataservices@judicium.com)  
Web: [www.judiciumeducation.co.uk](http://www.judiciumeducation.co.uk)  
Telephone: 0203 326 9174

You can complain about what we do with your personal information. If you are not happy with our answer to your complaint then you can complain to the Information Commissioner's Office:

Information Commissioner's Office  
Wycliffe House  
Water Lane

Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.