

**GODOLPHIN SCHOOL****PRIVACY NOTICE FOR PARENTS, PUPILS AND FAMILY MEMBERS**

Last reviewed:	July 2021
Next review: month/year	July 2023
Reviewed by:	School Privacy Officer, School Senior Information Risk Officer

## **Introduction**

- 1.1 We take your privacy very seriously. We ask that you read this Privacy Notice carefully as it contains important information on who we are, how and why we collect, store, use and share ("process") personal information, your rights in relation to your personal information and how to contact us and supervisory authorities in the event you have a complaint.
- 1.2 This privacy notice relates primarily to our processing of personal information for educational purposes. We have a separate privacy notice for our processing of personal information in relation to our support and development activities and the Old Godolphin Association has its own privacy notice for alumnae.

## **2 What is personal information?**

Personal information is information that identifies you as an individual and relates to you, for example, your contact details, financial information, exam results and photos and images captured by CCTV.

## **3 Who we are**

- 3.1 The Godolphin School ("the School") is an independent school and a registered charity (number 309488) located at Milford Hill, Salisbury, Wiltshire, SP1 2RA. The School is administered by its corporate trustee, The Godolphin School Trustee Limited (company number 08527491), of the same address.
- 3.2 Some processing of your personal data is carried out by The Godolphin Parents' Association (GPA) and, in the case of younger pupils, The Friends of Godolphin Preparatory School (FoGP), both unincorporated associations formed by us. We remain responsible as 'controller' for their processing of your personal information.

## **4 The personal information we collect and use**

- 4.1 The personal information we collect varies according to who you are. For that reason we have distinguished between the personal information we process about parents and family members on the one hand and pupils on the other.

**Parents and other family members**

- 4.2** In the course of running the School and delivering educational services we collect the following personal information about you:
- 4.2.1** Names, addresses, telephone numbers, e-mail addresses and other contact details for parents and next of kin;
  - 4.2.2** Information about members of your family, your family relationships and family circumstances;
  - 4.2.3** Information about court orders or criminal petitions which relate to you;
  - 4.2.4** Information relevant to any complaint made to the School which involves you;
  - 4.2.5** CCTV images of you taken on the School premises;
  - 4.2.6** Photographs or videos of you taken at School events;
  - 4.2.7** Bank details and other financial information;
  - 4.2.8** Information verifying your identity;
  - 4.2.9** Information about your financial background. Some of this information may come from third parties such as credit reference agencies or your child's previous schools or publicly available sources such as Companies House;
  - 4.2.10** Other information provided by you on registration and admissions forms or by your child's previous schools or the local authority;
  - 4.2.11** Health information that you give us or that we receive from third parties such as the local authority or health professionals.

## **Pupils**

In the course of running the School and delivering educational services we collect the following personal information about pupils.

- 4.2.12 Information provided about pupils on registration and admissions forms (such as name, contact details, disabilities, difficulties with work, hobbies and interests, medical information and family circumstances) or by pupils' previous schools (such as achievements and difficulties) or by pupils, teachers and others during the course of pupils' education at the School;
- 4.2.13 Pupil references given or received by the School about pupils and information provided by other educational establishments and/or other professionals or organisations working with pupils or the local authority;
- 4.2.14 Information about pupils' health or disabilities and information from you, doctors and other professionals, including personal care information (where appropriate);
- 4.2.15 Ethnicity, religion, country of birth and mother tongue;
- 4.2.16 Copies of Education, Health and Care Plans (EHCPs) or Statements of Special Educational Needs including;
  - (a) Education, Care and Therapy Reports from previous education providers;
  - (b) Academic and pastoral information;
  - (c) Risk assessment data and meeting minutes (regarding pupil education, care and therapy, progress and behaviour);
  - (d) Case notes and clinical notes (regarding pupil medical care and therapy);
  - (e) Individual lesson plans and schemes of work, as well as individual Annual Review documents;
  - (f) Pupil social worker details and safeguarding information;
- 4.2.17 Information about past, prospective and current pupils' dates of birth, academic (including study programmes), disciplinary, admissions and attendance records (including reasons for absences);
- 4.2.18 National curriculum assessment results, examination scripts and marks (including assessment, tracking and progress data);
- 4.2.19 Information about pupils which is relevant to any complaint made to the School which involves them;

- 4.2.20 Information about court orders or criminal petitions which relate to pupils;
  - 4.2.21 Information relating to pupils' use of email, the internet and mobile electronic devices such as iPads (including where appropriate its content);
  - 4.2.22 Video or photographic images of pupils;
  - 4.2.23 Public exam results, sports fixtures and other news relating to pupils;
  - 4.2.24 Images created by CCTV. CCTV is not used in private areas such as toilets or changing rooms;
  - 4.2.25 Educational institutions attended by former pupils;
  - 4.2.26 Former pupils' addresses.
- 4.3 This Privacy Notice applies in addition to any other privacy information we provide in School policies or about a particular use of personal data, for example when collecting data via an online or paper form.

## **5 How we use your personal information**

- 5.1 Our primary reasons for using your personal information are to facilitate the provision of educational services, to safeguard and promote the welfare of pupils and in relation to our support and development activities. These include the more specific reasons below:

### **Parents**

- 5.1.1 To contact you regarding your child's education and events and activities;
- 5.1.2 To provide appropriate care and support to your child;
- 5.1.3 To comply with our safeguarding obligations to protect the welfare and well-being of your child and other pupils at the School;
- 5.1.4 To deal with complaints;
- 5.1.5 To ensure the School site is safe;
- 5.1.6 To promote the School on social media or our website;
- 5.1.7 To facilitate administration of fees and other expenses as well as voluntary support for the School;
- 5.1.8 To assess your ability to pay our fees and any application for deferment of fees or a bursary and to recover unpaid fees;
- 5.1.9 To consider your child's application for admission;

5.1.10 To meet your dietary requirements and make reasonable adjustments for any disability you may have;

5.1.11 For the ongoing administration of the School including management planning and forecasting, School trips, work experience, careers advice and mandatory completion of the School census.

### **Pupils**

5.2 To administer our registration and admissions processes;

5.3 To provide pupils with an education including through their use of online educational platforms and their participation in internal and external examinations;

5.4 To ensure pupils' safety, health and wellbeing and provide them with appropriate support;

5.5 To deal with complaints;

5.6 To monitor pupils' use of technology to ensure it is responsible and safe. (Further information regarding this is available in our Online Safety Policy available on our website);

5.7 (In relation to images and videos) to identify and educate pupils and to promote the School in our prospectus, on social media or on our website;

5.8 To celebrate and promote pupils and the School (for example, in relation to awards won, examination results and sports fixtures) on our website and in the media;

5.9 To promote site and pupil safety;

5.10 To send magazines, newsletters and other publications to former pupils and follow their progress;

5.11 To comply with our obligations regarding the right of overseas pupils to study in the UK;

5.12 To meet our obligations in relation to school inspections;

5.13 To manage and operate the School effectively and lawfully;

5.14 To ensure proper behaviour of pupils;

5.15 For the ongoing administration of the School including management planning and forecasting, School trips, work experience, careers advice and mandatory completion of the School census; and

- 5.16 After pupils have left the School, we may retain details of your name, dates of attendance and achievements for the purposes of maintaining a historical record relating to the School.

### **GPA and FoGP**

- 5.17 The GPA and FoGP use your personal information to assist us in providing educational services by developing effective relationships between staff, parents and others and engaging in activities and providing facilities which support the School and advance the education of the pupils.

## **6 Who we share your personal information with**

- 6.1 The third parties with whom we will or may share your personal information are:
- 6.1.1 Local authorities and the Department for Education in accordance with our legal obligations, for example regarding registration, attendance, safeguarding or educational and health needs;
  - 6.1.2 The Independent Schools Inspectorate to assist them in their inspections;
  - 6.1.3 Law enforcement bodies for safeguarding purposes, the prevention and investigation of crime and the prosecution of offenders;
  - 6.1.4 Other emergency services and/or the Health and Safety Executive if there is an emergency or incident at the School;
  - 6.1.5 Suppliers of healthcare and social care;
  - 6.1.6 Our legal advisers for the purpose of obtaining legal advice;
  - 6.1.7 Consultants, experts and other advisers and suppliers including online educational platforms who assist the School in fulfilling its educational, administrative and operational purposes. These include accountants and legal advisers, IT consultants and third party cloud computing services, bursary application consultants and debt recovery agents;
  - 6.1.8 The government as part of our reporting requirements;
  - 6.1.9 UK visas and immigration division of the Home Office regarding a pupil's right to study in the UK if they are not of British nationality;
  - 6.1.10 The Charity Commission where required, for example, if a serious incident has occurred;

- 6.1.11 Our insurers, for example where there is a serious incident at the School;
  - 6.1.12 Former or prospective schools or educational establishments, for example, in relation to the offer of a place, exam results, academic and behavioural records, any safeguarding issues and references;
  - 6.1.13 Examination boards when you take public examinations;
  - 6.1.14 Other family members, such as a parent or step-parent, subject to their being entitled to such information;
  - 6.1.15 For overseas pupils whose parents live overseas, any guardian you appoint, subject to their being entitled to such information;
  - 6.1.16 Any agent appointed to act on your behalf where parents are based overseas;
  - 6.1.17 Event booking platforms in connection with your attending events;
  - 6.1.18 The Old Godolphin Association (only names and contact details of alumnae);
  - 6.1.19 The GPA and/or FoGP and, in connection with any support and development activities, The Godolphin Foundation (registered charity no 1168399); and
  - 6.1.20 Where the personal information held on pupils forms part of the School's historical record, on request and with express permission of the School, the hard copy register and other records may be made available to visitors.
- 6.2 The GPA and/or FoGP may share information about parents (such as your name and contact details) with other parents for the purposes of carrying out the GPA's and FoGP's respective functions.
- 6.3 We will only share personal information when we have a good reason to do so.

## **7 Whether information has to be provided by you, and if so why**

- 7.1 The provision of your personal information is necessary to enable us to deliver education and related services. If you object to the provision of certain information, we will inform you if it is mandatory. This may be because we need the information to meet a legal obligation or we cannot provide a service without it.

## **8 Reasons we can collect and use your personal information**

- 8.1 We rely on a number of different lawful bases when we collect and use your personal information.
- 8.2 **Contract:** this allows us to process personal information where necessary for the performance of a contract to which you are a party (or intend to become a party), such as the parent contract.
- 8.3 **Legal obligation:** this allows us to process personal information where necessary to comply with a legal obligation to which we are subject, such as to report a safeguarding concern, to comply with a court order or to provide information to the Department for Education or the local authority.
- 8.4 **Vital interests:** this allows us to process personal information on those very rare occasions where it is necessary to protect you or someone else from risk of death or serious injury.
- 8.5 **Public task:** this allows us to process personal information where necessary for the performance of a specific task which is in the public interest and set out in law, such as the provision of education or safeguarding.
- 8.6 **Consent:** in limited circumstances, we will not process your personal information without your prior consent, for example, where we use images of pupils for promotional purposes. You can withdraw your consent at any time by contacting our Privacy Officer using the contact details at the end of this notice. Any use of your personal information before you withdraw consent remains valid.
- 8.7 **Legitimate interests:** this allows us to process personal information where necessary for our or another person's legitimate interests except where you have overriding privacy interests. We rely on this lawful basis for a large part of our processing activities and the legitimate interests which we have identified include:
- 8.7.1 Providing educational services, extra-curricular activities and pastoral care to pupils;

- 8.7.2** Facilitating the efficient management and operation of the School including historical and other research and statistical analysis;
  - 8.7.3** Ensuring pupils' proper behaviour;
  - 8.7.4** Administering pupil registration and admission;
  - 8.7.5** Safeguarding and promoting the welfare of pupils and our employees;
  - 8.7.6** Promoting the objects and interests of the School, including through promotional publications and, where necessary, enforcing our rights against you;
  - 8.7.7** Ensuring site and IT security;
  - 8.7.8** Using your information in connection with legal disputes, for example if you make a claim against the School;
  - 8.7.9** Protecting the School's reputation;
  - 8.7.10** Ensuring that all relevant legal obligations of the School are complied with, for example in relation to inspections and reporting to the local authority;
  - 8.7.11** Dealing with complaints;
  - 8.7.12** Ensuring that there is an active community of supporters which will benefit the School and members of the School community;
  - 8.7.13** Using your personal information to administer our events;
  - 8.7.14** Complying with our contractual obligations where you are not a party to the contract;
  - 8.7.15** Exchanging information with other schools or other educational institutions;
  - 8.7.16** In relation to GPA and/or FoGP processing, advancing the education of pupils in the School by developing effective relationships between staff, parents and others associated with the School and engaging in activities or providing facilities or equipment which support the School and advance the education of the pupils; and
  - 8.7.17** Maintaining a historical record of the School.
- 8.8** We may rely on more than one lawful basis for some of our processing activities.

## **9 How long your personal information will be kept**

**9.1** We will not retain your personal information for longer than necessary for the purposes set out in this notice. It follows that our retention periods will vary depending on the type of personal information concerned, for example, CCTV footage will be kept for a much shorter period than pupil files. Our retention periods are generally dictated by the following criteria:

**9.1.1** Statutory requirements;

**9.1.2** Department for Education guidelines;

**9.1.3** The limitation period within which legal claims may be brought and the duration of any claims;

**9.1.4** The period within which complaints, challenges and appeals may be brought and the duration of any complaints, challenges or appeals;

**9.1.5** The period for which your personal information is still being used, for example, to keep you informed about our news and how you can support us or for historical research or statistical purposes.

**9.2** When it is no longer necessary to retain your personal information, we will delete or anonymise it.

## **10 Keeping your personal information secure**

**10.1** We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine need to know it. Those processing your information on our behalf will do so only in an authorised manner and are subject to a duty of confidentiality.

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

## **11 Transfer of your information out of the UK**

**11.1** We do not usually transfer your information out of the UK during the course of our general operations. There are some exceptions which include:

**11.1.1** Where you ask us to communicate with you overseas, for example, if you are on holiday or live outside the UK;

- 11.1.2 Where we need to communicate with third parties in relation to a School trip outside the UK;
- 11.1.3 Where we appoint a non-UK representative to facilitate the admission of non-UK pupils.
- 11.2 We will ensure that any transfers of your personal information outside the UK are made:
  - 11.2.1 With your consent;
  - 11.2.2 To countries or organisations which are the subject of an EU Commission adequacy decision or a UK adequacy regulation as appropriate;
  - 11.2.3 Subject to an agreement containing the EU's standard contractual clauses or the UK's standard data protection clauses as appropriate; or
  - 11.2.4 Otherwise in compliance with applicable data protection laws.

For more information about the safeguards in place for our transfers of personal information outside the UK, please contact the Privacy Officer.

## **12 Your rights**

- 12.1 Under applicable data protection laws, you have a number of important rights which you can exercise free of charge. In summary, those include the right to:
  - 12.1.1 Access your personal information and certain other supplementary information that this Privacy Notice is already designed to address;
  - 12.1.2 Require us to correct any mistakes in your information which we hold;
  - 12.1.3 Require the erasure of personal information concerning you in certain situations;
  - 12.1.4 Receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit that information to a third party in certain situations;
  - 12.1.5 Object at any time to processing of personal information concerning you for direct marketing;
  - 12.1.6 Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you;

- 12.1.7 Object in certain other situations to our continued processing of your personal information, for example, where we process personal information on the basis of 'legitimate interest'; and
  - 12.1.8 Otherwise restrict our processing of your personal information in certain circumstances.
- 12.2 For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the UK GDPR.
- 12.3 If you would like to exercise any of these rights, please:
- 12.3.1 Contact our Privacy Officer;
  - 12.3.2 Let us have enough information to identify you;
  - 12.3.3 Let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and
  - 12.3.4 Let us know the information to which your request relates.

In some circumstances, we may need a pupil's authorisation to respond to a request for information about them by a parent.

- 12.4 If you would like to unsubscribe from any marketing communications you receive from us, please contact our Privacy Officer. It may take up to five working days during term time (or the first five working days of a new term if notice is received during a holiday period) for any changes to be implemented. Until that point, our continued use of your information will be lawful.

## **13 How to complain**

- 13.1 We hope that we can quickly and satisfactorily resolve any query or concern you raise about our use of your information. Please contact our Privacy Officer in the first instance.
- 13.2 You also have the right to complain to the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/>. If you live or work outside the UK but within the EU or EEA, you can also complain to your local supervisory authority.

**14 Changes to this Privacy Notice**

14.1 We may change this Privacy Notice from time to time. Please check it periodically.

**15 How to contact us**

15.1 Please contact our Privacy Officer if you have any questions about this privacy notice or your data protection rights using the following contact information:

15.1.1 By email on [privacy@godolphin.org](mailto:privacy@godolphin.org);

15.1.2 By telephone on 01722 430500; or

15.1.3 By post at Godolphin School, Milford Hill, Salisbury, SP1 2RA

**16 Do you need extra help?**

16.1 If you would like this notice in another format (for example: audio, large print, braille) please contact us (see 'How to contact us' above).