



Privacy Policy (Pupil)

Action	Policy to be reviewed annually		
	Committee	Date	Completed
Reviewed	Bursar	Michaelmas 2019	✓
Reported	HR Staff & Conditions Committee	Michaelmas 2019	✓
Approved	Board of Governors	Michaelmas 2019	✓
Next review	Bursar	Michaelmas 2021	

Gresham's School Pupil Privacy Notice

Gresham's School (Registered charity 1105500)

1. Introduction

Gresham's School has a responsibility to look after and use your data. We take our responsibilities as a data controller seriously and are committed to using your personal data that we hold in accordance with Data Protection laws.

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

We are giving you this notice because it is important that you are prepared to make decisions about your personal information.

If you have any questions about this notice please talk to your Housemaster, Tutor or the School's Data Compliance Manager by email: dcm@greshams.com

2. Types of personal data that we process

Personal information is information that the School holds about you and which identifies you. We process personal data about you because the School has a legitimate interest in the data to be able to carry out your education. Where your data is needed for reasons other than this, we will seek consent for its use.

Specifically, the School has a legitimate interest in:

- providing you with an education;
- safeguarding and promoting your welfare and the welfare of other children;
- promoting the objects and interests of the School, including fundraising, for example if we want to raise money to fund bursaries or new buildings;
- facilitating the efficient operation of the School.

The personal data we process takes different forms – it may be factual information, expressions of opinion, images or other recorded information which identifies or relates to you. Examples include:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- family details;
- admissions, academic, disciplinary and other education related records, information about special educational needs, references, examination scripts and marks;
- education and employment data;
- images, audio and video recordings.

As a school, we need to process special category personal data (for example, concerning health, ethnicity, religion or biometric data) and criminal records information about some individuals (particularly pupils and staff). We do so in accordance with applicable law (including with respect to safeguarding or employment) or by explicit consent.

3. Collecting, handling and sharing personal data

We collect most of your personal data directly from your parents, guardians, agents and yourselves. Where you have come from another school, they will have passed on your data to us so that we can continue to teach and care for you. The School Health Centre will also have access to your medical records so that they can provide you with medical and wellbeing care, when requested.

Your personal data that is held by us is used by members of staff solely for the purposes for which it was provided. To ensure that your data is kept secure, the School has put in place measures and policies that ensure that only those members of staff that require access have it granted. The School will not move your personal data outside of the European Economic Area unless we are satisfied that your personal data will be given the same level of protection as it has whilst on the school site.

As part of school business, we share your personal data (including special category personal data where necessary) with third parties such as examination boards, the School Health Centre, the School's professional advisors and relevant authorities (eg. the Local Children Safeguarding Board, Disclosure and Barring Service, UK Visas and Immigration and the Department for Education). Some of our systems are provided by third parties, eg. databases, website, calendar, texting and email portal services or cloud storage providers. This is always subject to contractual agreements that your personal data will be kept securely and only in accordance with our specific requirements.

4. Purposes for which we process personal data

We process your personal data to support the School's operation as an independent boarding school for boys and girls aged two to sixth form, examples of which are:

- Depending on where you will go when you leave us, we may need to provide your information to other schools, colleges and universities or potential employers. For example, we may share information about your exam results and provide references. We may need to pass on information which they need in order to look after you.
- When you take public examinations (e.g. GCSEs) we will need to share information about you with examination boards. For example, if you require extra time in your exams.
- We may share your academic and (where fair) your behaviour records with your parents or education guardian so they can support your schooling.
- We may need to report some of your information to the government. For example, we may need to tell the local authority that you attend the School or let them know if we have any concerns about your welfare.

- We will monitor your use of email, the internet and school owned devices. This is to check that you are not misbehaving when using this technology or putting yourself at risk of harm. If you would like more information about this, you can read the ICT Acceptable Use policy or speak to your Housemistress or Housemaster.
- We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms.
- We may need information about any court orders or criminal matters which relate to you. This is so that we can safeguard your welfare and wellbeing and the other pupils at the School.
- If you are from another country we have to make sure that you have the right to study in the UK. We might have to provide information to UK Visas and Immigration, who are part of the government.
- We may need to share information with the police or our legal advisers if something goes wrong or to help with an inquiry. For example, if one of your classmates is injured at School or if there is a burglary.
- 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 you have misbehaved in a serious way, and the police have become involved, we may need to use information about the action taken by the police.
- We may share some information with our insurance company to make sure that we have the insurance cover that we need.
- We will only share your information with other people and organisations when we have a good reason to do so. In exceptional circumstances, we may need to share it more widely than we would normally.
- Ensuring that the School is compliant with all relevant legal obligations.

If you have any concerns about any of the above, please speak to your Housemistress or Housemaster.

5. For how long we keep your data

We will retain your personal data after you have left the School, only where we are allowed to do so and only for so long as necessary or required by law. Currently we retain all pupil files as required by an ongoing national programme, the Independent Inquiry into Child Sexual Abuse. If you have any specific queries about our record retention periods, or wish to request that your personal data is considered for erasure, please contact the School's Data Compliance Manager: dcm@greshams.com

6. Your rights

You have various rights under Data Protection Law to access and understand the personal data we hold about you, and in some cases to ask for it to be erased or amended or for us to stop processing it, but subject to certain exemptions and limitations.

You always have the right to withdraw consent, where given, but you must be aware that the School may 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 exist under some form of agreement with you or your parent or guardian.

If you would like to access or amend your personal data, or have some other objection to how your personal data is used, please make your request to the School's Data Compliance Manager: dcm@greshams.com

We will respond to any such written requests as soon as we can and in any event within one month in the case of requests for access to information. We will be better able to respond quickly to smaller, targeted requests for information. If the request is excessive or similar to previous requests, we may ask you to reconsider or charge a proportionate fee, where Data Protection Law allows.

You should be aware that some data is exempt from the right of access. This may include information which identifies other people, or information which is subject to legal privilege.

7. Change of details

We try to ensure that all your personal data is as up to date and accurate as possible. Please notify the relevant School secretary of any significant changes to important information, such as contact details, held about you.

Our privacy notice should be read in conjunction with our other policies and terms and conditions which make reference to personal data, including our Parent Contract, our Safeguarding Policy, Health & Safety Policies, Acceptable Use Policies and IT Policies.

We will update this Privacy Notice from time to time. Any substantial changes that affect how we process your personal data will be sent to you directly, as far as practicable.

If you believe that we have not complied with this policy or have acted otherwise than in accordance with Data Protection law, you should notify the School's Data Compliance Manager. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with us before involving them.