Whole School Policy

Privacy Notice

Action	Policy to be reviewed biennially		
	Committee	**Date**	**Completed**
Reviewed	Bursar	1 September 2026	✓
Reported	Audit and Risk	November 2026	
Approved	Board of Governors	December 2026	
Next review	Bursar	September 2028	

1. Introduction

Gresham's School is a company registered in England and Wales (the "School"). Our company registration number is 05196298 and our registered office is Gresham's School, Cromer Road, HOLT, Norfolk NR25 6EA. The School is also a registered charity and our charity number is 1105500. This Privacy Notice is intended to provide information about how the School will collect, use and hold (or "process") personal data about individuals including: current, past and prospective pupils; and their parents, carers or guardians (referred to in this policy as "parents"). This makes the School a data controller of your personal information and this information is provided because data protection law gives individuals rights to understand how their data is processed. Please read it carefully and, if you have any questions regarding your personal data, or its use, please contact the School's Data Compliance Manager by email on dcm@greshams.com; by telephone on 01263 714500; or, by post at Data Compliance Manager, Gresham's School, Holt, NR25 6EA.

This privacy notice also applies in addition to the School's other relevant terms and conditions and policies, including:

- any contract between the School and the parents of pupils;
- the School's policy on taking, storing and using of images of children;
- the School's CCTV and biometrics policies;
- the School's Data Protection and Data Subject Access policies;
- the School's retention of records policy;
- the School's safeguarding, pastoral, security and health and safety policies, including as to how concerns or incidents are recorded; and
- the School's ICT Acceptable Use Agreement and Online Safety policy.

Anyone who works for, or acts on behalf of, the School (including staff, volunteers, governors, and service workers) should be aware of and comply with this notice and the School's Privacy Notice for staff, which provides further information about how personal data about these individuals will be used.

2. Responsibility for Data Protection

The School has appointed the Head of IT Services as the Data Compliance Manager who will deal with all day-to-day requests and enquiries concerning the School's use of Personal Data (see section on "Your Rights" below). The Bursar has ultimate responsibility for Data Protection as Data Protection Lead.

3. Why the School needs to process personal data

In order to carry out its operation as an independent boarding school for boys and girls aged two to 18, the School needs to process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents). Some of this activity the School will need to carry out in order to fulfil its legal rights, duties or obligations – including where we have a legal obligation to share safeguarding information. Some processing will be necessary in order to fulfil our rights and obligations 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 that category of its (or its community's) "legitimate interests":

- for the purposes of pupil selection, to confirm the identity of prospective pupils and their parents, and retain a record if appropriate for the purposes of future applications or openings;
- 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, including where such services are provided remotely (either temporarily or permanently);
- to carry out credit, identity and source of funds checks, whether with previous schools and/or third-party sources or service providers, including for the purposes of verifying that parents are not subject to (or within the purview of) sanctions;
- maintaining relationships with alumni and the School community, including direct marketing or fundraising activity;
- for the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests;
- for the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
- to enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;
- to give and receive information and references about past and current pupils, including relating to outstanding fees or payment history, 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' health and welfare and provide appropriate pastoral care;
- to monitor (as appropriate) use of the School's ICT and communications systems in accordance with the school's ICT Acceptable Use Agreement;
- to make use of photographic images of pupils in School publications, on the School website and (where appropriate) on the School's social media channels;
- for security purposes, including biometrics and CCTV in accordance with the school's biometric information notice or CCTV policy;
- for regulatory record keeping / compliance purposes in respect of immigration requirements, as an employer and/or visa sponsor;
- to promote the School to prospective parents and pupils;
- 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 (concerning health, ethnicity, religion, biometrics 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, 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) 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 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 comply with public health requirements, including managing on-site testing and/or processing the results of tests taken by pupils or other members of the School community, and sharing this information with relevant health authorities;
- To provide educational services in the context of any special educational needs of a pupil;
- in connection with employment of its staff, for example DBS checks, welfare, union membership or pension plans;
- to run any of its systems that operate on biometric data, such as for security;
- as part of any School or external complaints, disciplinary or investigation process that involves such data, for example if there are SEND, health or safeguarding elements; or
- for legal and regulatory purposes (for example child protection, diversity monitoring, health and safety and immigration / visa sponsorship compliance) and to comply with its legal obligations and duties of care.

4. Types of personal data we process

We process personal data about prospective, current and past: pupils and their parents; staff, suppliers and contractors; donors, friends and supporters; and other individuals connected to or visiting the School (including students enrolled on our holiday courses). We have a legitimate interest in the data to be able to carry out the functions of a school. However, where this is not the case we will seek consent for its use.

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 a living individual. Examples include:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);
- family details;
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- education and employment data;
- images, audio and video recordings;
- financial information (e.g. for bursary assessment or for fund-raising);
- courses, meetings or events attended;
- biometric information, which will be collected and used by the School in accordance with the School's biometrics information notice;
- bank details and other financial information, e.g. about parents (or others) who pay fees to the school, and any anti-money laundering information we are required to collect by law;
- personnel files, including in connection with academics, employment or safeguarding;
- nationality and other immigration status information (e.g. right to work / study), including copies of passport information;
- information about pupils' health and medical conditions, special educational needs and family circumstances / living arrangements;
- where appropriate, 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 occasionally other individuals) engaging in school activities, and images captured by the school's CCTV system.

5. Collecting, handling and sharing personal data

We collect most of the personal data we process directly from the individual concerned (or in the case of pupils, from their parents/guardians). In some cases, we collect data from third parties (for example, referees, previous schools, the Disclosure and Barring Service, or professionals or authorities working with the individual) or from publicly available resources.

Processing by Third Parties. For the most part, personal data collected by the School will remain within the School, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis).

Data sharing. Occasionally, the School – including its governing board – will need to share personal information relating to its community of staff, pupils and parents (including special category data) with third parties. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions. Examples, though not exhaustive, include:

- examination boards;
- the School Doctor;
- if you are a parent and a member of PTA/FOGS, the School may share, with your written consent, your contact details with the PTA/FOGS, but the PTA/FOGS will be a separate data controller and the School is not responsible for the PTA's/FOGS' processing of personal data;
- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- third party system providers (e.g. hosted databases, School website, School calendar, texting portal services or cloud storage providers);
- stage 3 Complaints Panels, which will include independent panel members;
- third parties and their advisers in the event of a possible or actual sale, merger or other restructuring of the School;
- government authorities (e.g. HMRC, DfE, CAFCASS, police, Home Office, a relevant public health / NHS body and / or local authority) and/or appropriate regulatory bodies; and
- we share personal data about Old Greshamians with the Old Greshamian Club ("the OGs").

We do not otherwise share or sell personal data to other organisations for their own purposes.

6. Fund raising and keeping in touch

Fundraising helps us to achieve our strategic objective of remaining independent. We fundraise from individuals, companies and foundations who want to support our charitable purposes. We do not use third-party profiling companies but we analyse publicly available data about potential donors (e.g. from LinkedIn, Companies House, Charity Commission, Who's Who, articles in publications) to create a profile of interests and preferences so that we can make appropriate requests.

We keep in touch with OGs, current or former parents or other members of the School community. We will use your contact details to keep you updated about our charitable activities and invite you to

events of interest by email and by post. We ask you to let us know your data preferences so that we can ensure our communications are relevant to you. You can update your data preferences at any time by emailing ogclub@greshams.com. Your data preferences will not affect our contact with you as a current parent or as an OG.

7. Access to sensitive data

Particularly strict rules of access apply in the context of "special category" data, most notably:

- health and medical / special needs records; and
- pastoral or safeguarding files.

Medical data. The School needs to process such information to comply with statutory duties and to keep pupils and others safe, but the School will ensure only authorised staff can access information on a need-to-know basis. This may include wider dissemination if needed for School trips or for catering purposes. Express consent will be sought where appropriate.

However, a certain amount of any Special Educational Needs and Disability (SEND) pupils' relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupils require.

Safeguarding data. Staff, pupils and parents are reminded that the School is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education or KCSIE and the Children Act 2004) 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 or where other statutory requirements are met. This is likely to include file notes on personnel or safeguarding files, low-level concerns records kept about adults and in some cases referrals to relevant authorities such as the Local Area Designated Officer or police.

The School is subject to a specific statutory duty to share information with certain organisations (including, but not limited to, local authorities, NHS Trusts, the police and other schools) where it is relevant to safeguarding and promoting a child's welfare. There is no threshold of risk or harm that needs to be met to trigger this duty and the only exception to it is in rare circumstances where sharing information would be more detrimental to the child than not sharing. Where the duty applies, confidential information can be shared without consent.

KCSIE also requires that, whenever a child leaves the School to join another school or college, his or her child protection file is promptly provided to the new organisation. The School will retain a copy in accordance with its retention policy for material related to safeguarding matters.

For further information about this, please view the school's Safeguarding and Child Protection Policy.

8. How long we keep your data

We have adopted Records Retention Guidelines which set out the time periods for which different categories of data are kept.

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. Typically, the legal recommendation for how long to keep ordinary staff and pupil personnel files is up to 7 years following departure from the School (or up to age 25 for pupils, whichever is the later). However, incident reports and safeguarding files will need to be

kept much longer, in accordance with specific legal requirements, such as to comply with the requirements of the Independent Inquiry into Child Sexual Abuse, which prohibits the destruction of records which may be relevant to the Inquiry.

If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Data Compliance Manager at dcm@greshams.com or the Bursar.

However, please bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data even following such request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

9. Your rights

You have various rights under UK Data Protection Law to access and understand the personal data we hold about you. You have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require us to correct the personal data we hold about you if it is incorrect;
- to require us (in certain circumstances) to erase your personal data;
- to request that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. The School will endeavour to respond to any such requests as soon as is reasonably practicable and in any event within statutory time-limits (which is generally one month, but fulfilling more complex or multiple requests, e.g. those involving third party information, or requests received during School holiday periods, may take 1-2 months longer).

If you would like to access or amend your personal data, or would like it to be transferred to another person or organisation, or have some other objection to how your personal data is used, please make your request to the School's Data Compliance Manager or Bursar.

We will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, we may ask you to reconsider and/or charge a proportionate fee.

You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal privilege. We are also not required to disclose any pupil examination scripts (though examiners' comments may fall to be disclosed), nor any confidential reference given by the School for the purposes of the education, training or employment of any individual.

10. Pupil Data

The rights under UK Data Protection legislation belong to the individual to whom the data relates. However, we will often rely on parental consent to process personal data relating to pupils (if consent is required) unless, given the nature of the processing in question, and the pupil's age and understanding, it is more appropriate to rely on 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, we will assume that pupils' consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare, 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, we may be under an obligation to maintain confidentiality unless, in our opinion, there is a good reason to do otherwise; for example where the School believes disclosure will be in the best interests of the pupil or other pupils, or is required by law.

Pupils can make subject access requests for their own personal data, provided that they have sufficient maturity to understand the request they are making. A person with parental responsibility will generally be entitled to make a subject access request on behalf of pupils, but the information in question is always considered to be the child's at law. A pupil of any age may ask a parent or other representative to make a subject access request on their behalf. Moreover (if of sufficient maturity) their consent or authority may need to be sought by the parent making such a request.

11. Change of details

We try to ensure that all personal data held in relation to an individual 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 Policy, ICT Acceptable Use Agreement and Data Subject Access Request Policy.

We will update this Privacy Notice from time to time. Any substantial changes that affect how your rights will be provided to you directly as far as is reasonably 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 or Bursar. 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.