



Godolphin School
Privacy Notice for Older Pupils

September 2018



Introduction

1. 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. The notice applies to all prospective and current pupils and should be read as appropriate depending on which category applies to you.
2. If you have any questions about this notice or your data protection rights, please talk to the School's Privacy Officer.

What is "personal information"?

3. Personal information is information that the School holds about you and which identifies you as an individual and relates to you. This includes information such as your name, date of birth and address as well as things like exam results, medical details and behaviour records. We will also hold information such as your religion or ethnic group. CCTV, photos and video recordings of you are also personal information.

How and why does the School collect and use personal information?

4. The School's primary reason for using your personal information is to provide you with an education. The School will also use your personal information to safeguard and promote your welfare and the welfare of others, for example so that we can look after you if you are hurt.
5. Set out below are examples of the different ways in which we use personal information and where this personal information comes from.
6. Registration and admissions forms give us a lot of personal information about you, such as your name, contact details, disabilities, any particular difficulties you have with work, hobbies and interests, medical information (such as about an allergy) and family circumstances. We get information from you, your parents, your teachers and other pupils. Your old school also gives us information about how well you did and any difficulties that you had, so that we can teach and care for you.
7. Sometimes we get information about you from your doctors and other professionals where we need this to look after you.
8. The following are examples of how we use your information:
 - 8.1. We will use information about you during the admissions process, e.g. when marking your entrance papers and learning more about you from your parents before you join the School. We may let your old school know if you have been offered a place at the School.
 - 8.2. We need to tell the appropriate teachers if you have a health issue or if you have special educational needs or need extra help with some tasks.
 - 8.3. We will need to share information about you (e.g. about your health and wellbeing) with the School Health Centre, doctor or counsellor.
 - 8.4. If we have information that you suffer from an allergy we will use this information so that we can look after you.

- 8.5. If we have information that you suffer from a disability, we will use this information to provide appropriate support.
- 8.6. We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as toilets and changing rooms.
- 8.7. We record your attendance and if you have time away from the School we record the reasons why.
- 8.8. We will need to report some of your information to the government and we will need to tell the local authority that you attend the School or if you leave and also let them know if we have any concerns about your welfare.
- 8.9. We are legally required to provide the Department for Education with certain information about you and your fellow pupils. Some of this information will be stored on the National Pupil Database. Organisations can request information from the National Pupil Database which includes information about you, but they are only allowed to do this for limited purposes and they must be very careful about how they use your information. More information can be found here:
<https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.
- 8.10. We may need to share information about you with the Health and Safety Executive (a government body) if there is a health and safety issue at the School.
- 8.11. The School is a charity which means that we may need to share your information with the Charity Commission which checks how we are behaving as a charity.
- 8.12. We will 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.
- 8.13. If you are from another country, we have to make sure that you have the right to study in the UK. Sometimes the government will ask us to provide information about you as part of our reporting requirements. In addition, we have a duty to provide information about you to UK Visas and Immigration.
- 8.14. Depending on where you will go when you leave us and when you do so, we will provide your information to other schools, colleges and universities, UCAS or potential employers and to Wiltshire Council. For example, we will share information about your exam results and provide references.
- 8.15. We may pass on information about you to your next school (if any) which they need to look after you, for example information about any concerns we have had regarding your welfare.
- 8.16. 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.
- 8.17. When we are inspected by the Independent Schools Inspectorate we will have to make your information available to the inspectors to help them to carry out their job.

- 8.18. If someone makes a complaint about how the School has conducted itself, such as if your parents complain that we have not looked after you properly, we may need to use your information to deal with this appropriately.
- 8.19. If applicable, the School may share information about you with the local authority for the purpose of preparation, implementation or review of any Statement of Special Educational Needs or Education Health and Care Plan.
- 8.20. We may need to share information about you with the police or our legal advisers if something goes wrong or to help with an enquiry, for example if one of your fellow pupils is injured at School or if there is a burglary. We may need to use information about the action taken by the police.
- 8.21. We use consultants, experts and other advisers to assist the School in fulfilling its obligations and to help run the School properly. We will share your information with them if this is relevant to their work.
- 8.22. We may share some information with our insurance company to make sure that we have the insurance cover that we need.
- 8.23. Parents who are based outside the UK will sometimes appoint someone to act on their behalf during the admissions process (an overseas agent). If this applies to you, your parents may provide information to the overseas agent so that the agent can pass it on to the School and we will sometimes share information with the overseas agent: e.g. we may send them the letter telling your parents that we are offering you a place so that they can pass this on to your parents.
- 8.24. We will share your academic and (where fair) your behaviour records with your parents (or where appropriate your guardian) so they can support your schooling.
- 8.25. We will monitor your use of email, the internet and mobile electronic devices e.g. iPads. In certain circumstances we will look at the content of your communications, such as emails and text messages. We monitor and look at your use of technology, including your phone, to check that you and your fellow pupils are using this technology responsibly and are not putting yourself at risk of harm or for other good reasons. If you would like more information about this you can refer to the Online Safety Acceptable Use Policy which you have signed or speak to the School's Privacy Officer.
- 8.26. We may use photographs or videos of you for the School's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the School. We may continue to use these photographs and videos after you have left the School. Sometimes we use photographs and videos for teaching purposes, for example to record a drama lesson.
- 8.27. We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing.
- 8.28. We must make sure that our computer network is working well and is secure. This may involve information about you, for example our anti-virus software might scan files containing information about you.

- 8.29. We sometimes use contractors to handle personal information on our behalf. For example, we may use IT consultants who might access information about you when checking the security of our network and we may also use third party “cloud computing” services to store some information away from the School site.
- 8.30. We may sometimes use a third party to provide activities such as an external sports coach. We may share your information with them, for example to tell them what sports you are good at.
- 8.31. We will keep details of your address when you leave so we can send you magazines, newsletters and other publications, to keep you informed about ways in which you can support the School (including fundraising) and find out how you are getting on. We will also pass your details onto the Old Godolphin Association, further information on which can be found here: <http://godolphincommunity.org/>
- 8.32. 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.
9. If you have any concerns about any of the above, please speak to the School’s Privacy Officer.

Our legal bases for using your information

10. This section contains information about the legal bases that we are relying on when handling your information.

10.1. Legitimate interests

This means that the processing is necessary for the School’s or someone else’s legitimate interests, except where your interests and fundamental rights override our legitimate interests. The School relies on legitimate interests for most of the ways in which it uses your information.

Specifically, the School has a legitimate interest in:

- providing you with an education and making sure that you are behaving properly;
- complying with our agreement with your parents for you to be at the School;
- looking after you, your fellow pupils and our staff (e.g. your teachers);
- keeping the School buildings safe;
- making sure that the School is well managed and that we protect the School’s reputation;
- telling people about the School and what we do here;
- ensuring that all relevant legal obligations of the School are complied with;
- using your information in connection with legal disputes;
- continuing to improve the School (e.g. if we want to raise funds for new buildings and facilities).

In addition, your personal information may be processed for the legitimate interests of others. For example, we may use information about you when investigating a complaint made by one of your fellow pupils.

If you object to us using your information where we are relying on our legitimate interests as explained above, please speak to the School's Privacy Officer.

10.2. Legal obligation

We may need to use your information in order to comply with a legal obligation, for example to report a concern about your wellbeing to the appropriate authorities. We will also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

10.3. Vital interests

We may need to use your information where this is necessary to protect the vital interests of you or any other person, for example to prevent death or serious injury.

10.4. Public interest

The School considers that it is acting in the public interest when we use your information for example in providing you and others with an education, safeguarding and promoting your welfare and that of your fellow pupils, facilitating the efficient operation of the School and ensuring that we comply with our legal obligations.

10.5. Special categories

The School is also required to comply with an additional condition where it processes special categories of personal information, including information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information and information about sex life or orientation. The School's grounds for processing information of this nature will depend on the circumstances and may include the following:

10.5.1. When this is necessary for reasons of substantial public interest, including employment, social protection and social security laws.

10.5.2. When this is necessary to protect the vital interests of any person where that person cannot give consent, for example if they are seriously hurt or are unconscious.

10.5.3. When this is necessary in relation to legal claims. This allows us to share information with our legal advisers and insurers.

10.5.4. When this is necessary for medical purposes including medical treatment and the management of healthcare services.

10.6 Criminal offence information

In exceptional circumstances, we may use information about criminal convictions or offences. We will only do this where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations, to exercise our rights or to look after our pupils.

10.7 More than one basis

In some cases we will rely on more than one basis for a particular use of your information. In addition we may move from one legal basis to another as circumstances change. For example, if we become really worried about your wellbeing, we may start to rely on legal obligation to share personal information with the local authority in addition to the other legal bases which are noted for looking after you.

10.8 Consent

Sometimes we may ask for your consent to use your information in certain ways. If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. Please speak to your Head of Year if you would like to withdraw any consent that you have given.

Sending information to other countries

11. We will not send your information to other countries which do not have the same level of protection for personal information as there is in the UK or the EU, unless you ask us to communicate with you overseas, e.g. when you are on holiday or live overseas, or otherwise give specific consent, such as when going on a School trip.

For how long do we keep your information?

12. We keep your information for as long as we need to in order to educate and look after you. We will keep some information after you have left the School, for example so that we can find out what happened if you make a complaint.
13. We will also need to retain your contact details so that we can send you information about what is happening at the School and about ways in which you can support the School (including fundraising).
14. In exceptional circumstances we may keep your information for longer than usual but only if we have a good reason and are allowed to do so under data protection law.
15. We can keep information about you for a longer time or even indefinitely if this is needed for historical, research or statistical purposes or as part of our wider legal and regulatory responsibilities.

What decisions can you make about your information?

16. You have a number of other rights regarding your personal information, some of which are new whilst others build on your existing rights. These rights are as follows:
 - 16.1. **Rectification:** if information the School holds about you is incorrect you can ask us to correct it;
 - 16.2. **Access:** you can ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to;
 - 16.3. **Deletion:** 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;
 - 16.4. **Portability:** in certain circumstances you can request the transfer of your information to you or to a third party, in a format that can be read by computer; and
 - 16.5. **Restriction:** 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; and
 - 16.6. **Objection:** you may object to us using your information where (a) we are using it for direct marketing purposes, (b) the basis on which we are relying is legitimate interests or public interest, (c) we are using it for historical or research or archiving purposes.

Further information and guidance

17. This notice is to explain how we look after your personal information. The School's Privacy Officer can answer any questions which you might have.
18. Please speak to the Privacy Officer if:
 - 18.1. You would like to exercise any of your rights listed above; or
 - 18.2. You would like us to update the information we hold about you; or
 - 18.3. You would prefer that certain information is kept confidential.
19. The Privacy Officer is in charge of the School's data protection compliance. You can speak to him/her direct or you can ask your parents to speak to us on your behalf if you prefer. If you consider that we have not acted properly when using your personal information, you can contact the Information Commissioner's Office (ico.org.uk)
20. The School's contact details are: Godolphin School

Milford Hill
Salisbury
SP1 2RA
Email: privacy@godolphin.org
Tel: 01722 430500

