



Rooted in Christ and Catholic tradition and under the guidance of its patron, St Edmund's aims to realise the God-given potential, in body, mind and spirit, of all members of its community through service and leadership.

Avita Pro Fide.

St Edmund's is committed to ensuring the welfare and protection of children in their care and this commitment is a fundamental part of the role of every employee.

ST EDMUND'S COLLEGE AND PREP SCHOOL - PRIVACY NOTICE

St Edmund's College is committed to protecting the privacy and security of personal information. This privacy notice describes how we collect and use personal information about individuals including: its staff; its current, past and prospective students; and their parents, carers or guardians and job applicants, in accordance with the UK General Data Protection Regulation (UK GDPR), section 537A of the Education Act 1996 and section 83 of the Children Act 1989.

INTRODUCTION

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.

This Privacy Notice is intended to cover the activities of St Edmund's College and Prep School, Edmundian Association and Old Hall Enterprises Ltd.

Parents should be aware that students who have turned 13, those in Rudiments and above, are deemed to have sufficient maturity to exercise their own personal data rights.

The Privacy Notice will refer to St Edmund's College and Prep School as 'the College', 'we' and 'us'; to parents, carers and guardians as 'parents' and to any individual aged 13 and above as 'you'.

What is the Privacy Notice for?

This privacy notice provides information on how St Edmund's College and Prep school collects and uses (or processes) personal information (or data) about individuals including its current, past and prospective staff, pupils and their parents, carers or guardians.

This information is provided because individuals have the right to understand how their information is used. College staff (including volunteers, governors and service providers), parents and pupils are encouraged to read this notice and understand the College's obligations to its entire community.

This Privacy Notice applies alongside any other information the College may provide about a particular use of personal data, for example when collecting data via an online or paper form.

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

- any contract between the College and its staff, or the parents of students;
- any policies or notices applicable to staff concerning the handling of personal data;
- the College's policy on taking, storing and using images of children;
- the College's CCTV policy;
- the College's retention of records policy;
- the College's safeguarding and health and safety policies, including as to how concerns or incidents are recorded; and
- the College's IT policies and protocol, including its ICT Acceptable Use Policy, Bring Your Own Device Policy, Taking, Storing and Using Images of Students Policy.

Responsibility for Data Protection

The Data Protection Officer or Deputies will deal with any request about the College's use of your personal information and work to ensure your personal information is used in accordance with this Privacy Notice and Data Protection Law.

What is personal information?

Personal information is information the College holds that identifies a person as an individual. This can include information such as date of birth, address, religion, ethnic group, medical details and behaviour records. Photos and video recordings are also personal information.

Why the College needs to process personal information and who it shares it with.

In order to carry out its ordinary duties to staff, pupils and parents, the College uses personal information as part of its daily operation to fulfil its legal rights, duties and obligations including those under contract with its staff or parents of its pupils.

Personal information may also be used to fulfil the College's legitimate interests, or the legitimate interests of a third party unless there is a good reason not to, for example, to protect an individual person.

Our primary reason for using your personal information is to provide educational services including musical education, physical training or spiritual development, career services, and extra-curricular activities to your child and to monitor pupils' progress, development and educational needs.

Listed below are other examples of the different ways in which the College may share and use personal information under the data protection categories of legitimate interest and legal obligations:

1. To safeguard pupil welfare and provide appropriate pastoral care.
2. To fulfil our contractual and legal obligations.
3. To provide statutory data collection information to the local authority, local government or regulatory bodies.
4. To maintain admissions and attendance registers.
5. For the purposes of planning, forecasting, research and statistical analysis including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis) to assist with the efficient operation of the College and to assess the quality of the services we provide.
6. The College may need to share personal information with our insurers, lawyers, accountants or consultants if necessary to complete their work.
7. To carry out or assist with any College or external complaints, disciplinary or investigation issues.
8. To enable appropriate authorities to monitor the College's performance and to intervene or assist with incidents as appropriate such as where we may have concerns about a pupil's welfare.
9. For security purposes, including CCTV.
10. For the purposes of pupil selection and to confirm the identity of prospective pupils and their parents. If a pupil is from another country, the College has to make sure they have the right to study in the UK. The College might have to provide their information to UK Visas and Immigration.
11. For the purposes of recruitment and selection decisions on prospective employees. This includes vetting and screening of applicants in accordance with regulatory and legislative requirements.
12. To monitor compliance with equal opportunities legislation.
13. To meet health and safety obligations.
14. The College may process financial information about parents in relation to paying fees, including relating to outstanding fees or payment history, to/from any educational institution that the student attended or where it is proposed they attend.
15. To provide and receive information and references about past, current and prospective pupils and staff with other Colleges or employers where the pupil or staff previously attended, or where they may go.
16. To maintain relationships with alumni and the College community including direct marketing or fundraising activity;
17. For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background;
18. To enable pupils to take part in national or other assessments and exams and to publish the results of public examinations or other achievements of pupils or staff on the College website.
19. To test and assess pupil progress and predict examination grades.
20. To monitor the use of the College's IT and communications systems in accordance with the College's Rules and Protocol for the use of the College Network and the Internet
21. To make use of photographic images of pupils and staff in College publications, on the College website, social media sites and use on internal displays in accordance with the College's policy on taking, storing and using images of children;

22. The College may use photographs or videos for teaching and production purposes, such as recording a drama lesson, exam practical evidence or College productions.

Sharing Data

The College may share relevant personal information with third parties where it is necessary. Information will be provided securely and where possible anonymised. The recipient of the information will be bound by confidentiality obligations and we require them to respect the security of your data and to treat it in accordance with the law. We share information with:

- The College's catering contractor
- External trip and activities companies including trips abroad
- Transport and coach companies
- External clubs and activities companies
- The College Insurers
- Law enforcement officials such as the Police and HMRC
- The local authority including welfare services and the Local Authority Designated Officer (LADO)
- The Department for Education (DfE) – on a statutory basis
- The NHS
- Prospective employers
- Occupational health (staff only)

The College uses third party 'cloud' services and websites to store personal information offsite for purposes such as:

- Testing and diagnosing pupils for special educational needs.
- National standardised testing for current and prospective students.
- Management of the co-curricular activities programme.
- Parent and staff online payment systems, information portals, messaging and emailing services, parents evening, club and ticket booking systems.
- Showing pupil progress and achievements, such as pupil portfolios.
- Teaching and learning websites and platforms that provide digital learning spaces for pupils and staff.
- Publishing sports fixture information and team sheets.
- Sending marketing emails to promote events such as open mornings.
- Making student work available to external examiners.
- Alumni database and communication.

The College will use the contact details of parents, alumni and other members of the College community to keep them updated about the activities of the College, including by sending updates and newsletters by email and by post. Unless the relevant individual objects, the College may also:

- Share personal data about current and past parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the College community;
- Contact current and past parents and/or alumni by post and email in order to promote and raise funds for the College; and
- Collect information from publicly available sources about current and past parents' and former pupils' occupation and activities, in order to maximise the College's fundraising potential.

Special category personal information

The College may need to use special category personal information such as racial or ethnic origin, health information and 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 may include:

- To safeguard pupil or staff, including volunteer welfare and provide appropriate pastoral or medical care and to take appropriate action in the event of an emergency, incident or accident. This could include disclosing details of an individual's medical condition where it is in the individual's interests to do so; for example for medical advice, social services, insurance purposes or to organisers of College trips and those who staff them.
- To provide educational support for any special educational needs or disability of a pupil.
- In connection with employment of its staff, for example to run DBS checks and manage pension plans.
- As part of any College or external complaints, disciplinary or investigation process that involves this data; for example if there are SEND, health or safeguarding elements
- For legal and regulatory purposes (for example child protection and health and safety etc) and to comply with its legal obligations and duties of care.

Types of personal information processed by the College

Data Protection regulations identify personal data as any information that identifies you as an individual. We collect this information throughout your association with the College, and sometimes beyond (for example, if you are a member of the Edmundian Association). This will include by way of example:

- Names, addresses, date of birth, gender and contact information including telephone numbers, email addresses, social media handles, IP addresses, usernames and other contact details.
- Passport details for identification and College trips abroad and Tiers 2 and 4 visa processing.
- Car details for those who use our car parking facilities.
- Bank and National Insurance details and other financial information e.g. about parents (or others) who pay fees to the College, and any anti money laundering information we are required to collect by law;.
- Past, present and prospective pupil academic, pastoral, disciplinary, admissions and attendance records, special needs information, examination papers and marks.
- Past, present and prospective parents' employment information.
- Where appropriate, information about individuals' health (special category data) and welfare and contact details for their next of kin.
- Special categories of personal data including ethnicity and religion.
- References given or received by the College about pupils or staff and information provided by previous educational establishments, other professionals or employers.
- Images of pupils and staff (and occasionally other individuals) taking part in College activities and images captured by the College's CCTV system.
- Recordings of pupils, staff and parents using the College's video conferencing platforms.
- Correspondence with and concerning staff, pupils and parents past and present.
- Information relating to past, present and prospective College personnel.
- Staff employment contract information such as start dates, hours worked, post, roles, education and training.
- Information collected during the staff recruitment process that we retain during your employment including references, criminal records information processed by law to enable you to work with children, proof of right to work in the UK, application form, CV, qualifications.
- Staff sickness and absence records as well as time and attendance records.
- Staff salary and benefits including payment details, payroll records, tax status information, national insurance number, pension and benefits information.
- Staff appraisals, performance review, disciplinary and capability issues.
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For alumni:

- your communication preferences;
- family and details of any partner/spouse;
- professional activities, employment, including work contact details;
- information you have publically shared on social media platforms;
- donation history, such as amount, purpose, date, method of payment;
- tax status and Gift Aid declarations;
- events attended and tickets purchased; and
- alumni website activity and any interactions with emails we send.

How the College collects personal information

Generally, the College receives personal information from the individual directly (including, in the case of pupils, from their parents). This may be via forms such as application, admission and data collection forms or in the ordinary course of interaction or communication (such as email or written assessments). However, in some cases, personal information may be supplied by third parties (for example, another school or other professionals or authorities) or collected from publicly available resources. This may include:

- personal data from your child's previous or new school(s), medical practitioners, photographers, local authorities, education authorities, business partners, payment and delivery services, debt collectors, lawyers and credit reference agencies.
- Personal data related to the process of bursary and scholarship decision that will deal with both personal data about your child and your finances.
- References given or received by the College about students, and information provided by previous educational establishments and/or other professionals or organisations working with students.
- Images of students (and occasionally other individuals) engaging in College activities. We may also use CCTV footage to ensure the College is safe.

- We may receive information about you if you use any of the websites we operate or the services we provide.

In addition, information pertaining to alumni is gathered via the leavers form, online registration, at events, when making donations, update forms, verbally, from contact within the community, social media and networking websites.

Who has access to personal information

The College may need to share personal information relating to its community with third parties such as professional advisers or relevant authorities such as The Department for Education, the Police, the local authority and the Independent Schools Inspectorate.

For the most part, personal information collected by the College will remain within the College and will be processed by appropriate individuals. Particularly strict rules of access apply to: Pastoral and safeguarding information, Medical records, CCTV.

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

However, a certain amount of medical, pastoral and special educational needs and disability information will need to be provided to staff so the necessary care and education that the pupil requires can be safely provided.

Staff, pupil and parents are reminded that the College is obliged 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 level of seriousness. 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 LADO or police.

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

For further information about this, please view the College's Safeguarding Policy.

For the purposes of maintaining a safe and secure environment, the College reserves the right to monitor all network traffic including internet use and email through its filtering systems.

Finally, some of the College's use of data is carried out on its behalf by third parties such as IT systems, web developers, cloud storage and social media providers.

Sending information to other countries

The College may send information to other countries where the College communicates with families, agents and guardians and the child when overseas (for example during the summer holidays if families live in a different country).

The European Commission has produced a list of countries which have adequate data protection rules. If the country that we are sending your information to is not on the list or is not a country within the European Economic Area (EEA), then it might not have the same level of protection for personal information as the UK.

How long we keep personal information

We will keep your information for as long as we need to in order to educate and look after your child. The College will retain personal information securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. For more information please refer to our Data Retention Policy. CCTV footage will be held and managed in accordance with our Security Policy.

Keeping in touch and supporting the College

The College and/or any relevant other organisation, e.g. Old Edmudian Association will use the contact details of parents, alumni and other members of the College community to keep them updated about College activities or alumni and parent events of interest, including sending updates and newsletters, by email and by post. The College may also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the College community, such as the Old Edmudian Association;

- Contact parents and/or alumni by post and email in order to promote and raise funds for the College and other worthy causes.

Should you wish to limit or object to any such use, or would like further information about them, please contact the Bursar in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising however, the College may need to retain some details to ensure that no more communications are sent to that particular address, email or telephone number.

Understanding your rights

Individuals have various rights under Data Protection Law to access and understand personal information about them held by the College and in some cases ask for it to be erased, amended, transferred or for the College to stop processing it subject to certain exemptions and limitations.

Any individual wishing to access, amend or correct their personal information or wishing it to be transferred to another person or organisation in an easily accessible format, should put their request in writing to the Data Protection Officer contactable via dataservices@judicium.com or 72 Cannon Street, London EC4N 6AE or call 020 3326 9174.

The College will endeavour to respond to any such requests as soon as possible and within 28 working days for a subject access request. If the request is overly excessive or similar to previous requests, the College may ask you to reconsider or may charge a proportionate fee.

Requests that cannot be fulfilled

You should be aware that GDPR rights (including the right of access) are limited to your own personal data, and certain data is exempt. This will include information which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations – [please see further below]), or information which is subject to legal privilege (for example legal advice given to or sought by the College, or documents prepared in connection with a legal action).

The College is also not required to disclose any student examination scripts (or other information consisting solely of student test answers); provide examination or other test marks ahead of their ordinary publication date; nor share any confidential reference held by the College that was (or will be) given for the purposes of the education, training, appointment or employment of any individual.

You may have heard of the 'right to be forgotten'. However, the College will sometimes have very strong reasons to refuse specific requests to amend, delete or stop using your personal information: for example, a legal requirement/interest identified in this Privacy Notice.

Subject access requests made directly by a pupil will be considered on a case by case basis depending on their age and maturity.

Pupil requests

Pupils can make subject access requests for their own personal data provided that, in the reasonable opinion of the College, 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 their behalf.

A person with parental responsibility will generally be entitled to make a subject access request on behalf of younger pupils. The law still considers the information in question to be the child's. For older pupils, the parent making the request may need to show evidence of their child's authority for the specific request.

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. Younger pupils may however be sufficiently mature to have a say in this decision depending on the child and the circumstances.

Parental requests, etc.

It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information but they and others will often have a legitimate interest or expectation of receiving certain information about pupils without their consent. The College may consider there are lawful grounds for sharing with or without reference to that pupil.

Parents will, in general, receive educational and pastoral updates about their children. Where parents are separated, the College 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, and relevant court orders or pastoral matters relating to the child.

All information 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 College is relying on consent as a means to process personal information, any individual may withdraw this consent at any time. Please be aware however, the College may have another lawful basis to process the personal information in question even without the individual's 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 (e.g. an employment or parent contract, a purchase of goods, services or membership of an organisation such as an alumni request).

Whose rights

The rights under Data Protection Law belong to the individual to whom the data relates. However, the College will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils - for example, under the parent contract or via a form. Parents and pupils should be aware that this is not necessarily the same as the College relying on strict consent.

Where consent is required, it may in some cases be necessary or appropriate - given the nature of the use and the pupil's age and understanding - to seek the pupil's consent either alongside or in place of parental 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 College 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. That is unless, in the College's opinion, there is a good reason not to.

However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal information being disclosed to their parents, the College may be under an obligation to maintain confidentiality unless, in the College's opinion, there is a good reason to do otherwise; for example where the College believes disclosure will be in the best interests of the pupil or other pupils or if required by law.

Staff and pupils are required to respect the personal data and privacy of others and to comply with the College's Rules and Protocol for the use of the College Network and the Internet and the College rules.

Data accuracy and security

The College will endeavour to ensure that all personal information held is as up to date and as accurate as possible. Individuals should notify the Bursar at their earliest opportunity of any changes to their information. Responsibility for changes in information relating to a pupil rests with the parent.

An individual has the right to request inaccurate or out-of-date information about them be deleted or corrected, subject to certain exemptions and limitations under Data Protection Law.

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

This notice

The College 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.

Concerns and Complaints

If an individual believes the College has not complied with this notice or not acted in accordance with Data Protection Laws, they should utilise the College complaints procedure and should also notify the the DPO contactable via dataservices@judicium.com or 72 Cannon Street, London EC4N 6AE or call 020 3326 9174.

The individual can also raise their concern with the Information Commissioner's Office (ICO - www.ico.org.uk) although the ICO recommends that steps are taken to resolve the matter with the College before involving them.

Review

Owner of policy:	Bursar		
Reviewed by:	Bursar	Technical Projects Manager	
Frequency of review:	Every 2 Years		
Policy last reviewed:	Trinity	2021	
Next review date:	Trinity	2023	
Sub-Committee reviewed at:	Academic & Finance Sub-Committee		