



How We Use Your Information Privacy Notice for Older Students

Pipers Corner School

January 2024

Privacy Notice for older students - Key Information

We would like to let you know how and why we collect information about you and what we do with it.

Information about you is called "personal data". The School uses all sorts of personal data. For example, we use information about how well you are doing at School. We also use information to ensure that we can take care of you. Photos and videos of you also count as your personal data.

The School uses your personal data in order to:

- Teach you and other students;
- Make sure that standards of behaviour are upheld at the School;
- Look after you and other people, for example your friends;
- Make sure that we comply with the law, are well managed and to protect our interests; and
- Advertise the School and tell people about the School and what we do here. For example, we may use photos of you in our prospectus, on our website or on social media.

Here are some examples of how we use your personal data and where that personal data comes from.

- Admissions forms give us lots of personal data. We get information from you, your parents, your teachers and other students. Your old school also gives us information about you so that we can teach you and care for you.
- Sometimes we get information from your doctors and other professionals where we need this to look after you.
- We may need to report some of your personal data to the government (the Department for Education). For example, we will need to tell the local authority that you attend the School, if you leave the School or if we have any concerns about your welfare.
- We tell your parents about how well you are doing at School. We will also tell them about your attitude to learning and, if necessary, your behaviour.
- We may use photos or videos of you to show prospective students what we do here and to advertise the School. These photos and videos may be put on the School's website, on our social media or in our prospectus. We may continue to use these photos and videos after you have left the School. Sometimes we use photos and videos for teaching purposes, for example, to record a drama lesson.
- We publish our public exam results, sports fixtures and other news on the website. We also put newsworthy articles and photos in the local news outlets, to raise the profile of the School.
- We use CCTV to make sure the School site is safe and to investigate incidents (for example, where there is a behaviour incident or someone has been injured). CCTV is not used in private areas such as changing rooms or toilets. However, CCTV may be used inside our buildings to ensure behaviour standards are upheld, where appropriate. For more information about our use of CCTV please ask to see our CCTV Policy.

- We will send you information to keep you up to date with what is happening at the School. For example, by sending you information about events and activities taking place (including fundraising events). We will also post links to the termly School magazine – Pipers’ Post – on our social media platforms.
- We will keep details of your address when you leave so we can keep you updated about what is happening at the School, to tell you about events and activities and find out how you are getting on. We may also pass your details onto the alumnae organisation which is called Cornerstones.

You have the following rights regarding your personal data:

- the right to have corrected any mistakes in personal data held;
- the right to request access to see the personal data held;
- the right to delete personal data in certain circumstances;
- the right for you to request the transfer of personal data to you or a third party (“portability”);
- the right to restrict the use of personal data; and
- the right to object to the use of personal data in certain circumstances.

These rights are explained in more detail in the full privacy notice which follows this Key Information, and your Head of Year can give you more information.

The full version includes additional points, such as:

- more information on why we use your personal data;
- for how long the School keeps your personal data; and
- our lawful bases for using your personal data.

If you have any questions about how we use your personal data, please speak to your form tutor who will be able to find out more for you.

Alternatively, you can speak to your parents who will talk to us on your behalf.

The Full Privacy Notice for Older Students

Introduction

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

If you have any questions about this notice please talk to your form tutor.

What is "personal data"?

Personal data is information about you.

This includes information such as your name, date of birth and address as well as things like exam results, medical details, and information about how well you behave. CCTV images, photos and video recordings of you are also your personal data.

Where we get your personal data from and who we share it with

We get your personal data from lots of different sources. For example, your teachers, parents, your old schools and any future school, other students and their parents. We might also get information from the government, for example the local authority might give us information that we need to look after you.

Sometimes, we will also share information with these people and organisations, for example, we will tell your parents about how well you are doing at school.

Below, we give lots of examples of where we get your personal data from, and who we share it with.

Why we use your personal data and our lawful bases for doing so

The School uses your personal data in order to:

1. Teach you and other students.
2. Make sure that standards of behaviour are upheld at the School.
3. Look after you and other people, for example your friends.
4. Make sure that we comply with the law, are well managed and to protect our interests.
5. Advertise the School and tell people about the School and what we do here, for example we may use photos of you in our prospectus, on our website or on social media.

We can only use your personal data if we have a good reason to do so. This is about having a "lawful basis" to use your personal data. Our lawful bases are as follows:

- **Legitimate interests:** This means that the School is using your personal data where this is necessary for the School's legitimate interests or someone else's legitimate interests.
 - Specifically, the School has a legitimate interest in:
 - educating and looking after its students;

- complying with its agreement with your parents for you to be at the School;
 - investigating if something has gone wrong;
 - promoting and protecting the School; and
 - ensuring that high standards are maintained.
- This lawful basis only applies where our legitimate interests are not overridden by your interests, rights and freedoms. Legitimate interests apply to all of the 5 purposes listed above.
- **Public task:** This allows the School to use your personal data where doing so is necessary to perform a task in the public interest or to exercise one of our functions or powers as a school. This basis applies to purposes 1, 2, 3 and 4 above. For example, when we teach and look after you.
 - **Legal obligation:** The School might need to use your personal data to comply with a legal obligation. For example, to report a concern about your wellbeing to Children's Services. Occasionally we may have a legal obligation to share your personal data with third parties such as the court.
 - **Vital interests:** Although this won't happen very often, we may need to use your personal data to protect you or someone else. For example, to prevent someone from being seriously harmed.

The section below contains more information about our purposes for using your personal data and the lawful bases.

Our purposes and lawful bases in more detail

This section gives you more information about why the School uses your personal data. Also, where we get it from, who it is shared with, and which lawful bases apply. It does not say anything different to the sections above but goes into more detail.

We have used a colour coded system so that you can see which lawful bases we are relying on for each of the purposes described at paragraphs 1 to 37 below.

The letters highlighted in different colours below refer to the lawful bases. So, **LI** means legitimate interests, **PI** means public task, **LO** means lawful obligation and **VI** means vital interests. So, **(LI, PI)** means that we are relying on both legitimate interests and public task for that purpose.

- 1 The School's primary reason for using your personal data is to provide you and other students with an education **(LI, PI)**.
- 2 The School will also use your personal data to safeguard and promote your welfare and the welfare of others (for example, so that we can look after you if you are hurt) **(LI, PI, VI)**.
- 3 We use information about you during the admissions process, for example when marking your entrance exams and learning more about you from your parents before you join the School] **(LI, PI)**.
- 4 We may let your old school know if you have been offered a place at the School. This is because they have a legitimate interest in finding out what

- happens to their former students as this will help them support their other students when they leave the school (LI).
- 5 The admissions forms which your parents complete give us lots of personal data about you, such as, your name, contact details, disabilities, any particular difficulties you have with work, your hobbies and interests, medical information (such as information about an allergy) and family circumstances (LI, PI).
- 6 We get information from you, your parents, your teachers and other students. Your old school also gives us information about how well you did and any difficulties you had so that we can teach you and take care of you (LI, PI).
- 7 Sometimes we get information from your doctors and other professionals where we need this to look after you (LI, PI).
- 8 We need to tell the appropriate teachers if you have a health issue and use your medical information to look after you (LI, PI).
- 9 We need to tell your teachers if you have special educational needs or need extra help with some tasks (LI, PI).
- 10 We may need to share information about you (for example about your health and wellbeing) with medical professionals (LI, PI, VI).
- 11 We may use your personal data in relation to keeping the School safe in case of a pandemic. For example, we might record that you have tested positive for a virus or that you have received a certain vaccine (LI, PI, VI). We have provided further information on how we use personal data in relation to a pandemic outside of this privacy notice.
- 12 If we have information that you suffer from an allergy we will use this information so that we can look after you (LI, PI, VI).
- 13 If we have information that you suffer from a disability we will use information about that disability to provide support (LI, PI).
- 14 Where appropriate, the School will have information about your religious beliefs or other beliefs and practices. For example, if you do not eat certain foods (LI, PI).
- 15 We use CCTV to make sure the School site is safe. Images captured of you via CCTV will be your personal data. CCTV may be used inside of school but will not be used in very personal areas. (LI, PI).
- 16 We will use your personal data to make sure the school site and buildings are safe, for example, we keep a record of who is on the school site at any given time (LI, PI).
- 17 We record your attendance and if you have time away from the School we record the reason(s) why (LI, PI).
- 18 We will need to share some information about you with the government (the Department for Education). We will also need to share your personal data with the local authority, for example, tell them that you attend the School, if you leave the School or let them know if we have any concerns

- about your welfare. The local authority may also share information with us for these reasons (LI, LO, PI).
- 19 We may need to share information about you with the Health and Safety Executive (a government organisation) if there is a health and safety issue at the School (LI, LO).
- 20 The School is a charity which means that we may need to share your personal data with the Charity Commission which checks how we are performing as a charity. We may also share your personal data with the Fundraising Regulator if this is relevant to their work (LI, PI, LO).
- 21 The School is sometimes inspected to make sure that we continue to meet high standards. We will have to make your personal data available to the inspectors to help them to carry out their job (LI, PI, LO).
- 22 We will need information about any court orders or criminal matters that relate to you. This is so that we can safeguard your welfare and wellbeing and the welfare and wellbeing of other students at the School (LI, PI).
- 23 If you are a foreign national we have to make sure that you have the right to study in the UK. Sometimes the government will ask us to provide information as part of our reporting requirements. In addition to this, where appropriate, we may have a duty to provide information about you to UK Visas and Immigration who are part of the government (LI, LO, PI).
- 24 Depending on where you will go when you leave the School we will provide your personal data to other schools, colleges and universities, UCAS or potential employers. For example, we will share information about your exam results and provide references. Any references that we provide or receive will be treated as confidential which means that you will not usually be provided with a copy (LI, PI).
- 25 If we hold safeguarding or child protection information about you, we will share that with your next school and any relevant safeguarding body, where appropriate (LI, PI, LO).
- 26 We may pass on information to your next school which they need to look after you, for example, information about any concerns we have had about your welfare (LI, LO, PI).
- 27 When you take public examinations (for example GCSEs) we will need to share information about you with examination boards. For example, if you require extra time in your exams (LI, PI). We may share your public exam results with your parents (LO, PI).
- 28 We will monitor your use of internet services and electronic devices (for example Chromebooks) in keeping with the statutory guidance Keeping Children Safe in Education. More information about this contained in the Acceptable Use of ICT policy. The monitoring we do is carried out using software tools (e.g. Smoothwall) which will automatically notify senior members of the Safeguarding Committee if there is a concern. (LI, PI).
- 29 Photos and Videos: The School regularly publishes photos and videos of our students. If we take a photo or video of you, we might put this on our website, on our social media pages or in our prospectus. We do this to

show prospective students what we do here and to advertise the School (LI).

We may continue to use these photos and videos after you have left the School unless you ask us not to (LI).

If we would like to use a photo or video of you in a more unusual or high profile way (for example on a banner or billboard), we will speak to you about this first.

Sometimes we use photos and videos for teaching purposes, for example to record a drama lesson. (LI, PI)

If you have concerns about us using photos or videos of you please speak to your Head of Year.

- 30 We may use your personal data in order to stay in touch with our alumnae. The School wants to build a network of alumnae that can assist one another in the forging of strong bonds, for the benefit of members of the association and current students at Pipers. The School is committed to making a Pipers education available to as many people as is possible, and there may be time when we appeal to our alumnae body for help in raising money to make this happen.
- 31 We publish our public exam results, sports fixtures and other news on the website and put articles and photos in the local news to tell people about what we have been doing (LI).
- 32 We will keep your contact details when you leave so we can keep you updated about what is happening at the School, to tell you about events and activities and find out how you are getting on We may also pass your details onto the alumnae organisation which is called Cornerstones.
- 33 The School takes every step to ensure our computer systems are protected and secure. This may involve information about you, for example, our anti-virus software might scan files containing information about you (LI).
- 34 Sometimes we hire someone from outside of the School to provide activities. For example, this could be a teacher or contractor who does not normally work for the School or it could be a company that provides outdoor activities. We may share your personal data with them, for example, to tell them what sports you are good at (LI, PI).
- 35 Some of the records the School keeps and which contain your personal data may be used by the School (or by someone else such as the government) to check that the School has maintained its high standards (LI, PI).
- 36 We also keep some information forever for archiving purposes and for historical research purposes. This includes the School's legitimate interest in keeping a record of what the School was like in the past.
- 36.1 For example, we keep some old photos so that we have a record of what the School was like in the past as this helps get people interested in the School's history.
- 36.2 Information held in our archive may be made publicly available but this would only be done in compliance with data protection laws. Please speak to your Head of Year if you would like more information (LI, PI).

- 37 We will share your personal data with the governors of the School if it concerns something they should know about or the information will enable them to fulfil their role as a governor. For example, this will apply if you have done something really well or if there is a problem at the School they need to know about (LI, PI).

We will only share your personal data 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.

As you will see from the information above, in some cases we will rely on more than one lawful basis for using your personal data.

We use service providers to handle personal data on our behalf for the following purposes:

- a) We have contractual arrangements with some IT Service providers who help support the School's computer systems. For example, they might need to access a file containing personal data when investigating a fault or checking the security of our IT network;
- b) Caterers may have information about any food allergies or intolerances that you have;
- c) We use software, applications and websites to help us with teaching, and to help us provide pastoral support to you and your classmates. For example, we use Google Workspace which allows you to access homework which has been set by your teachers; and
- d) We use third party "cloud computing" services such as Microsoft 365 to store information rather than the information being stored on hard drives located on the School site.

If you have any questions about any of the above, please speak to your Head of Year.

Consent

We may ask for your consent to use your personal data in certain ways as an alternative to relying on any of the lawful bases above (e.g. LI or PI). For example, we may ask for your consent to send you information about a fundraising event by email.

If we ask for your consent to use your personal data you can take back this consent at any time. But any use of your personal data 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

When the School sends personal data outside of the UK, we have to consider if the other country has the same level of protection for personal data as there is in the UK. Some countries are considered by the UK Government to have adequate rules and this includes all of the European Union and some other countries, such as, New Zealand, Norway, Switzerland and Argentina.

The School sends your personal data to countries with adequate rules, for example when:

- An IT service has been authorised to provide a service to the school community;
- You join a school trip abroad and we share your personal data with activity providers and the hotel.

In certain circumstances, we may send your personal data to countries which do not have the same level of protection for personal data as there is in the UK. For example, we may do this:

- If an authorised cloud computer system is not based in Europe; and
- If you join a school trip to a country that is not listed in the previous paragraph.

If you have any questions about the safeguards that are in place please contact the Bursar or the Compliance Manager.

For how long do we keep your personal data?

We keep your personal data for as long as we need to in order to educate and look after you. We will keep a lot of information after you have left the School, for example, so that we can find out what happened if you make a complaint or need the school to write a reference for you.

In some cases we may keep your personal data for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

The School's Information and Records Retention Policy contains more detailed information. You can ask the Compliance Manager at the School to see a copy of this policy.

What decisions can you make about your personal data?

Data protection legislation gives you a number of rights regarding your personal data. Your rights are as follows:

- **Correction:** if personal data the School holds about you is incorrect or incomplete you can ask us to correct it.
- **Access:** you can also ask what personal data we hold about you and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about you, where it came from and who we have sent it to.
- **Deletion:** you can ask us to delete the personal data that we hold about you in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your personal data to you or to a third party in a format that can be read by computer in certain circumstances. This applies where (a) the personal data has been provided by you; (b) the basis that we are relying on to process your personal data is consent or contract (please see "Our purposes and lawful bases in more detail" above); and (c) the personal data is being processed by us on a computer.
- **Restriction:** you can request that we restrict how we use your personal data in certain circumstances. Please contact your Head of Year if you would like to know more.

- **Object:** you may object to us using your personal data where:
 - we are using it for direct marketing purposes (for example to send you an email about a fundraising opportunity);
 - the lawful basis on which we are relying is either legitimate interests or public task. Please see the above section "Our lawful bases for using your personal data";
 - if we ever use your personal data for scientific or historical research purposes or statistical purposes.

Your Head of Year can give you more information about your data protection rights.

Further information and guidance

Your Head of Year can answer any questions which you might have.

Like other organisations we need to keep your personal data safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.

Please speak to your Head of Year or another member of staff if:

- you would like to exercise any of your rights listed above; or
- you would like us to update the information we hold about you; or
- you have any concerns about how your personal data is used or shared.

The Bursar (as the School's appointed Senior Responsible Individual for Data Protection), supported by the Compliance Manager, is in charge of the School's data protection compliance. You can ask your Head of Year to speak to the Bursar or Compliance Manager, or you can speak to the Bursar or Compliance Manager yourself. Alternatively, you can ask your parents to speak to us on your behalf if you prefer.

If we ask you to tell us something and you do not do so then this may make it more difficult for us to teach and look after you and others.

You have a right to lodge a complaint with the Information Commissioner's Office (ico.org.uk). The ICO is the data protection regulator which means that they enforce the rules that we have to obey.

If you have any concerns about how we have handled your personal data, we would kindly ask that you contact us in the first instance before you speak to the ICO so that we have an opportunity to put things right.