

This policy was reviewed in: **October 2022**

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This policy applies to the whole school including EYFS

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Introduction

This policy is about your obligations under the data protection legislation. Data protection is about regulating the way that the School uses and stores information about identifiable people (Personal Data). It also gives people various rights regarding their data, such as the right to access the Personal Data that the School holds on them.

As a school, we will collect, store and process Personal Data about our staff, students, parents, suppliers and other third parties. We recognise that the correct and lawful treatment of this data will maintain confidence in the School and will ensure that the School operates successfully.

You are obliged to comply with this policy when working with Personal Data on our behalf. Any breach of this policy may result in disciplinary action.

The Bursar is responsible for helping you to comply with the School's obligations. All queries concerning data protection matters should be raised with the Bursar.

Application

This policy is aimed at all staff working in the School (whether directly or indirectly), whether paid or unpaid, whatever their position, role or responsibilities, which includes employees, governors, contractors, agency staff, work experience/ placement students and volunteers.

This policy does not form part of your contract of employment and may be amended by the School at any time.

What information falls within the scope of this policy?

Data protection concerns information about individuals. Personal Data is data which relates to a living person who can be identified either from that data, or from the data and other information that is available. Information as simple as someone's name and address is their Personal Data.

In order for you to do your job, you will need to use and create Personal Data. Virtually anything might include Personal Data. Examples of places where Personal Data might be found are:

- On a computer database stored on our network, any device or on an online service
- In a file, such as a student report
- A register or contract of employment
- Students' exercise books, coursework and mark books
- A report about a child protection incident
- A record about disciplinary action taken against a member of staff
- School newsletters
- Photographs and videos of students
- A tape recording of a job interview
- Contact details and other personal information held about students, parents and staff and their families
- Contact details of a member of the public who is enquiring about placing their child at the School
- Financial records of a parent
- Information on a student's performance
- An opinion about a parent or colleague in an email
- Health records
- Email correspondence

These are just examples, there may be many other things that you use and create that would be considered Personal Data.

You must be particularly careful when dealing with certain types of Personal Data which falls into any of the categories below:

- Information concerning safeguarding or child protection matters
- Information about serious or confidential medical conditions and information about special educational needs
- Information concerning serious allegations made against an individual (whether or not the allegation amounts to a criminal offence and whether or not the allegation has been proved)
- Financial information including parent and staff bank details
- Information about an individual's racial or ethnic origin
- Political opinions
- Religious beliefs or other beliefs of a similar nature
- Trade union membership
- Physical or mental health or condition
- Sex life including sexual orientation
- Genetic information
- Allegations made against an individual (whether or not the allegations amount to a criminal offence and whether or not the allegations have been proved)
- Biometric information (e.g. a student's fingerprints following a criminal investigation)

These categories are referred to as **Critical School Personal Data** in this policy and in the information security policy. If you have any questions about your processing of these categories of Personal Data please speak to the Bursar.

Your obligations

Personal Data must be processed fairly, lawfully and transparently

What does this mean in practice?

- "Processing" covers virtually everything which is done in relation to Personal Data, including using, disclosing, copying and storing Personal Data.
- People must be told what data is collected about them, what it is used for, and who it might be shared with unless it is obvious. They must also be given other information, such as, what rights they have in their information, how long we keep it for and the right to complain to the Information Commissioner's Office (the data protection regulator).
- This information is provided in the School's own privacy notice. Copies of the School's privacy notices can be accessed on the School's website/SharePoint site.
- If you are using Personal Data in a way which you think an individual might think is unfair please speak to the Bursar.
- You must only process Personal Data for the following purposes:
 - Ensuring that the School provides a safe and secure environment.
 - Providing pastoral care.
 - Providing education and learning for our students.
 - Providing additional activities for students and parents (for example activity clubs, trips and visits).
 - Protecting and promoting the School's interests and objectives (for example fundraising).
 - Safeguarding and promoting the welfare of our students
 - To fulfil the School's contractual and other legal obligations
- If you want to do something with personal data that is not on the above list or is not set out in the relevant privacy notice(s), you must speak to the Bursar. This is to make sure that the School can lawfully use the Personal data.
- We may sometimes rely on the consent of the individual to use their Personal Data. This consent must meet certain requirements and therefore you should speak to the Bursar if you think that you may need to seek consent. If you are not an employee of the School (for example, if you are

a volunteer) then you must be extra careful to make sure you are only using Personal Data in a way that has been expressly authorised by the School.

You must only process Personal Data for specified, explicit and legitimate purposes

What does this mean in practice?

For example, if students are told that they will be photographed to enable staff to recognise them when writing references, you should not use those photographs for another purpose (e.g. in the School's prospectus). Please see the School's Taking, Storing and Using Images of Students Policy for further information relating to the use of photographs and videos.

Personal Data held must be adequate and relevant for the purpose

What does this mean in practice?

This means not making decisions based on incomplete data. For example, when writing reports, you must make sure that you are using all of the relevant information about the student.

You must not hold excessive or unnecessary Personal Data

What does this mean in practice?

Personal Data must not be processed in a way that is excessive or unnecessary. For example, you do not need to share with all staff that a student has a health condition, but instead only share with those staff that need to know.

The Personal Data that you hold must be accurate

What does this mean in practice?

You must ensure that Personal Data is complete and kept up to date. For example, if a parent notifies you that their contact details have changed, you should update the School's information management system and, as good practice, inform staff who you know have regular contact with the parent.

You must not keep Personal Data longer than necessary

What does this mean in practice?

- The School has an Information and Records Retention Policy about how long different types of data should be kept for and when data should be destroyed. This applies to both paper and electronic documents. You must be particularly careful when you are deleting data and must check the policy before doing so. You must only delete Personal Data if you are authorised to do so.
- Please speak to the Bursar for guidance on the retention periods and secure deletion.

You must keep Personal Data secure

You must comply with the following School policies and guidance relating to the handling of Personal Data:

- Taking, Storing and Using Images of Students Policy
- Acceptable Use of ICT Policy for Staff
- Information and Records Retention Policy

You must not transfer Personal Data outside the UK or EEA without adequate protection

What does this mean in practice?

If you need to transfer Personal Data outside the UK or the EEA please contact the Bursar. For example, if you are arranging a school trip to a country outside the EEA.

Accountability

The School is responsible for and must be able to demonstrate compliance with the data protection principles. You are responsible for understanding your particular responsibilities under this policy to help ensure we meet our accountability requirements.

Sharing Personal Data outside the School - dos and don'ts

- **Do** share Personal Data on a need to know basis only - think about why it is necessary to share data outside of the School - if in doubt, always ask your line-manager or the Bursar.
- **Do** send emails containing personal data within the school community using an Office 365 link to documents stored in SharePoint or OneDrive. Check the permissions on the share are to specified users only.
- **Do** seek advice from IT Support about how to securely send any type of Personal Data externally.
- **Do** seek advice from IT Support before storing data on any app, website or other software that has not been authorised by the School. This is imperative if you will ask students or colleagues to also log into the service, or you use the service to store any type of personal data. You may need to complete a 'Data Impact Assessment for New Electronic System' form.
- **Do** check that any external web service you are using transfers personal data securely over the internet. (This can be evident by seeing the 'https' at the beginning of the web address and the browser will display a secure symbol such as a green padlock symbol).
- **Do** share Personal Data in accordance with the School's Safeguarding Policy. If you have any questions or concerns relating to safeguarding you must contact the Designated Safeguarding Lead (DSL) or one of the deputy DSLs.
- **Do** be aware of "blagging". This is the use of deceit to obtain Personal Data from people or organisations. You must seek advice from the Bursar where you are suspicious as to why the information is being requested or if you are unsure of the identity of the requester (e.g. if a request has come from a parent but using a different email address).
- **Do** make sure that you have permission from the Director of Admissions & Marketing to share Personal Data on the School website or using the School's social media accounts.
- **Do** be aware of phishing. Phishing is a way of making something (such as an email, telephone call or a letter) appear as if it has come from a trusted source. This is a method used by fraudsters to access valuable personal details, such as usernames and passwords. Don't reply to email, text, or pop-up messages that ask for personal or financial information or click on any links in an email from someone that you don't recognise. Report all concerns about phishing to IT Support.
- **Do not** disclose Personal Data to any external agency / Contractor / Individual without consulting the Senior Leadership Team.

Accessing or Sharing Personal Data within the School

This section applies when Personal Data is accessed or shared within the School.

Personal Data must only be shared within the School on a "need to know" basis, utilising iSAMS, SharePoint, Firefly and email groups to target the correct audience.

Examples which are **likely** to comply with data protection legislation:

- A teacher discussing a student's academic progress with other members of staff (for example, to ask for advice on how best to support the student)
- Sharing Personal Data in accordance with the School Safeguarding and Promoting Children's Welfare Policy
- Informing an examination invigilator that a particular student suffers from panic attacks
- Disclosing details of a teaching assistant's allergy to bee stings to colleagues so that you/they will know how to respond (but more private health matters must be kept confidential)

Examples of sharing which are **unlikely** to comply with data protection legislation:

- A Head of Department being given access to all records kept by the School nurse working within the Department (seniority does not necessarily mean a right of access)
- A member of staff looking at a colleague's HR records without good reason. For example, if they are being nosey or suspect their colleague earns more than they do. In fact accessing records without good reason can be a criminal offence
- Informing all staff that a student has been diagnosed with dyslexia (rather than just informing those staff who teach the student)
- Disclosing personal contact details for a member of staff (e.g. their home address and telephone number) to other members of staff (unless the member of staff has given permission or it is an emergency)

You may share Personal Data to avoid harm, for example in child protection and safeguarding matters. You will have received training on when to share information regarding welfare and safeguarding issues. If you have not received this training, please contact the DSL.

Individuals' rights in their Personal Data

People have various rights in their information.

You must be able to recognise when someone is exercising their rights so that you can refer the matter to the Bursar. These rights can be exercised either in writing (e.g., in an email) or orally.

Let the Bursar know if anyone (either for themselves or on behalf of another person, such as their child):

- wants to know what information the School holds about them or their child
- asks to withdraw any consent that they have given to use their information or information about their child
- wants the School to delete any information
- asks the School to correct or change information (unless this is a routine updating of information such as contact details)
- asks for personal data to be transferred back to them or to another organisation
- wants the School to stop using their information for direct marketing purposes. Direct marketing has a broad meaning for data protection purposes and might include communications such as the School newsletter or alumni events information
- objects to how the School is using their information or wants the School to stop using their information in a particular way, for example, if they are not happy that information has been shared with a third party

Please note, a person may be committing a criminal offence if they alter, block, erase, destroy or conceal information to prevent it from being disclosed (for example, to prevent its disclosure if a subject access request for that information has been received). Therefore, if you are asked to provide information or documents to a colleague at the School who is preparing a response to a request for information then you must make sure that you provide everything.

Requests for Personal Data (Subject Access Requests)

One of the most commonly exercised rights mentioned above is the right to make a subject access request. Under this right people are entitled to request a copy of the Personal Data which the School holds about them (or in some cases their child) or to certain supplemental information.

Subject access requests do not have to be labelled as such and do not even have to mention data protection. For example, an email which simply states "Please send me copies of all emails you hold about me" is a valid subject access request. You must always immediately let the Bursar know when you receive any such requests.

Receiving a subject access request is a serious matter for the School and involves complex legal rights. Staff must never respond to a subject access request themselves unless authorised to do so.

When a subject access request is made, the School must disclose all of that person's Personal Data to them which falls within the scope of his/her request - there are only very limited exceptions. There is no exemption for unprofessional comments or embarrassing information, so think carefully when writing comments about people (for example in a teacher's markbook or in an email) as they could be disclosed following a subject access request. However, this must not deter you from recording and passing on information where this is appropriate to your professional duties, particularly in relation to safeguarding matters.

Breach of this policy

Any breach of this policy will be taken seriously and may result in disciplinary action. Breaches of the GDPR need to be reported to the Information Commissioner's Office by the School.

A member of staff who deliberately or recklessly discloses Personal Data held by the School without proper authority is guilty of a criminal offence and gross misconduct. This could result in summary dismissal.

Appendix A: Privacy Notice

Introduction

Pipers Corner School is an Independent Day school for girls, located in Buckinghamshire, UK. The main service provided is Primary and Secondary education.

The School's registered office is:

Pipers Corner School
Pipers Lane
Great Kingshill
High Wycombe
Buckinghamshire
HP15 6LP

Pipers Corner School is a data controller for the purposes of data protection legislation as we process personal data. This notice is designed to give you information about how we process that data.

Our duties in respect of personal data are very important to us and we are committed to using the personal data we hold in accordance with the law. The School's Data Protection Lead (DPL) is responsible for data protection at the School and will endeavour to ensure that the School complies with its responsibilities.

Any queries should be directed to the DPL by email at bursar@piperscorner.co.uk or by post to: The Bursary, Pipers Corner School, Pipers Lane, Great Kingshill, High Wycombe, Buckinghamshire, HP15 6LP.

The School is registered as a data controller with the Information Commissioner's Office reference: Z6713705.

What this notice is for

This notice is intended to provide information about how the School will use (or "process") personal data about individuals including: its staff; its current, past and prospective students; and their parents, carers or guardians (referred to in this notice as "parents").

This information is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used. Staff, parents and students are all encouraged to read this Privacy Notice in order to understand how we process their personal data.

This notice applies alongside any other information the School may provide about a particular use of personal data, for example when collecting data via an online or paper form. The notice should be read in conjunction with our other policies which apply to you and which make reference to personal data. This includes any contract you have entered into with the School, our safeguarding, pastoral and health and safety policies and our IT policies, all of which are available upon request. Separate privacy notices apply to our staff.

It should be noted that the School also has safeguarding and child protection duties and that, if there is a potential conflict between these duties and data protection rights, the welfare of the child is paramount and exemptions from certain elements of Data Protection Law may apply.

What type of personal data does Pipers Corner School process?

We process personal data about prospective, current and past students and their parents (which includes guardians and carers as well as anyone with parental responsibility for that student); staff, governors and volunteers; suppliers and contractors; job applicants; persons hiring School facilities; or other activity or event organised or hosted by the School (whether sole organiser or in partnership with any other organisation) (collectively "educational events"); donors, friends and supporters; family members of any above; families of members of staff living on site; those who visit the School for any reason (visitor logs); and others connected with the School.

The personal data we process takes different forms (it may be factual information, opinion, images or School recorded information) and the type of data processed will depend on your relationship with the School. Examples of the personal data we process include:

- Names, addresses, telephone numbers, email addresses and other contact details
- Past, present and prospective students' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks
- Personnel files, including application form and references, contract of employment and any amendments to it; correspondence with or about you, for example letters to you about a pay rise or, at your request, a letter to your mortgage company confirming your salary; information needed for payroll, benefits and expenses purposes; contact and emergency contact details; records of holiday, sickness and other absence; information needed for equal opportunities monitoring; and records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance record
- Where appropriate, information about individuals' health and welfare, and contact details for their next of kin
- Bank details and other financial information, e.g. about parents who pay fees to the school
- References given or received by the school about students, and relevant information provided by previous educational establishments and/or other professionals or organisations working with students
- Correspondence with and concerning staff, students and parents past and present
- Images of students (and occasionally other individuals) engaging in school activities, and images captured by the school's CCTV system (in accordance with the school's policy on taking, storing and using images of children)
- Car registration details (about those who use our car parking facilities)

We may also need to process special category personal data (for example, regarding physical or mental health, ethnicity, religion data and trade union membership details) and criminal records information about some individuals (prospective staff). Where we process this type of data, we will either rely on rights or duties imposed on us by law (for example, in respect of safeguarding, health and safety or employment) or on explicit consent.

How does the School collect personal data?

Most of the personal data processed by us is provided by the individual (or, in the case of students, by their parents or, in the case of children attending educational events, their parents or school). This may be provided via a form or simply in the ordinary course of interaction or communication with individuals.

However, some personal data is provided to us by third parties (for example, previous schools, referees, the Disclosure and Barring Service, professionals or authorities working with the individual) either with the consent of the individual or in accordance with the law. Information may also be obtained from publicly available resources i.e. credit checks.

Who has access to personal data?

For the most part, personal data held by the School will remain within the School and will be processed by appropriate members of staff for the purpose for which the data was collected. As an organisation, we have taken appropriate technical steps to protect your personal data and have implemented policies addressing the use of technology. Strict rules of access apply in the context of medical records together with pastoral or safeguarding information although a certain amount of information will need to be disseminated to appropriate School staff in order to provide the necessary care and education that the student requires (for example, details of any allergies).

Some of the School's systems are provided by third parties with some being hosted by the School. Those hosted internally include the School's Management Information system and certain finance and administrative functions. Those hosted externally include the School's website, and online payment system. The organisations providing these systems are aware of the requirements of current data protection legislation.

In certain circumstances, we may share personal data (including, where necessary, special category personal data) with third parties in order to further the objectives and interests of the School and facilitate the efficient operation of the School or in accordance with the law. Examples include:

- Professional advisers (e.g. lawyers, insurers, and accountants)
- Government authorities (e.g. HMRC, DfE, police or the local authority)
- Appropriate regulatory bodies (e.g. the Independent Schools Inspectorate, the Charity Commission or the Information Commissioner's Office)
- Service providers (e.g. catering companies, travel companies and transport companies)
- The School alumnae group – Cornerstones Online

In addition, anonymised data is used to complete various census returns (e.g. the Independent Schools Council [ISC] annual census).

Why do we process personal data?

We process personal data to support the School's operations, objectives and interests. These broad purposes encompass the following:

- The admission of students, including the awarding of scholarships and bursaries.
- The provision of education and related services to students (and their parents), including academic, sporting, musical tuition, training and activities (and in the context of any special educational needs of a student), personal and spiritual development, school trips, participation in examinations, administration of the school curriculum and timetable, monitoring student progress and needs, reporting on the same internally and to parents, provision of references and career services (including after a student has left the School).
- The safeguarding of student's welfare and provision of pastoral and medical care, whether by their Form Tutor, other members of academic staff, the School Nurse, or other member of the teaching or support staff.
- The selection for, the provision of education and related services, the safeguarding of welfare and provision of pastoral and medical care to those children attending educational events where the arrangement has been entered into between the parent of that child and the School.
- Compliance with legislation and regulation, including that relating to safeguarding, health and safety, employment, charities and independent schools.
- Operational management including the compilation of student records, the administration of invoices, fees and accounts, the management of the School's property, the management of security and safety arrangements (including the use of CCTV and monitoring of the School's IT and communication systems in accordance with our Acceptable Use of ICT Policy) management planning and forecasting, research and statistical analysis, the administration and implementation of the School's rules and policies for students, staff and others, the maintenance of historic archives, enabling the relevant authorities to monitor the School's performance, and other operational purposes.
- Staff administration, including the recruitment of staff, governors and other volunteers and engagement of contractors (including compliance with DBS procedures), administration of payroll, pensions, sick leave and other benefits, review and appraisal of performance, conduct of any grievance, capability or disciplinary procedures, the maintenance of appropriate human resources records for current and former staff and providing references.
- The promotion of the School and activities organised by it including through its own websites, the prospectus, other publications including publication of results of public examinations or other achievements of students or using photographic images of students in School publications, and, where appropriate, on School social media channels.
- Maintaining relationships with alumnae and the wider Pipers Corner community or prospective parents, including direct marketing or fundraising activity.
- Provision of educational events, including the direct marketing, promotion, administration, monitoring, development and performance of such educational events and maintenance of relationships with former attendees.
- Obtaining appropriate professional advice and insurance for the School.

In some situations, we have to carry out these processes in order to meet our legal obligations, whether they are imposed on us by law or through contract (such as the Terms & Conditions, staff employment contracts or Booking Terms & Conditions). In other situations, we have obtained the

consent of the relevant individual to the particular processing of the data, or the School has determined that it has a legitimate interest in the processing activity.

For how long do we keep personal data?

Personal data will be kept securely and for no longer than is necessary or required by law. This period will vary depending on the piece of personal data and the purpose for which it was collected. Please see the School's Information and Records Retention Policy for further details. If you have any specific questions in respect of retention, please direct them to Data Protection Lead.

Cornerstones

The School Alumnae organisation, Cornerstones, will keep the contact details of alumnae so that those individuals can be updated about the activities of the School or about alumnae initiatives and events of interest, unless the relevant individual notifies the School that they no longer wish to receive such updates. Alumnae are asked to "opt in" when they leave Upper Sixth and their details stored on the Cornerstones Online community site. Individuals are in charge of their own personal data held on the site which can be amended or removed by themselves at any time.

Archive

It should be noted that records considered by the School to be of historic value are retained in the School's archive indefinitely. Personal data in the archive relating to the living individuals which is not otherwise in the public domain is not shared with third parties without that individuals' consent.

What rights do you have in respect of your personal data?

If we process personal data about you, you have a number of rights in respect of that data. Subject to certain exemptions and limitations specified by law, you can:

- ask the School to change incorrect or incomplete data
- ask the School to delete your data
- withdraw your consent to the School processing certain personal data where the School is relying on your consent to do so
- object to the School processing your data where we are relying on our legitimate interests to do so
- ask the school to transfer your personal data to another organisation
- access and obtain a copy of your data on request

If you would like to exercise any of these rights, please contact the School's Data Protection Lead by email at bursar@piperscorner.co.uk or by post to The Bursary, Pipers Corner School, Pipers Lane, Great Kingshill, High Wycombe, Buckinghamshire, HP15 6LP.

We will respond to such written requests as soon as is reasonably practicable and in any event within the time limits permitted by law. The School will be better able to respond quickly to smaller, targeted requests for information.

Data relating to children

Rights in respect of personal data applies to the individual to whom the data relates. However, in respect of children, we will often rely on parental authority or notice to process personal data (if consent is required) unless we consider that, given the age and understanding of the child and the type of processing, it is more appropriate to rely on the child's consent. Parents should be aware that whether they are consulted or not will depend upon the interests of the child, the parents' rights and the circumstances of the related issue.

In general, we will assume that a child's consent is not required before ordinary disclosure of their personal data to their parents (for example, to keep parents informed of their child's progress, behaviour and activities or in the interests of the child's welfare) unless the School considers that there is a good reason to do otherwise.

If a child seeks to raise concerns confidentially with a member of staff and expressly withholds their consent to their personal data being disclosed to their parents or other bodies, the School may be obliged to keep the information confidential unless it is considered that there is a good reason to do otherwise.

Children can make a subject access request for their own personal data if they have sufficient maturity to understand the request they are making. A child may ask a parent or other representative to make a request on their behalf. Whilst a parent will generally be entitled to make a subject access request on behalf their child, the personal data will always be considered to be the child's in law and, if of sufficient maturity, that child's consent or authority may be required to be obtained by the parent making the request. All information requests from, on behalf of, or concerning children – whether made under subject access or simply as an incidental request – will therefore be considered on a case by case basis.

This notice

The School will update this notice from time to time. Any substantial changes that affect your rights will be notified on our website and, as far as reasonably practicable, notified to you.

If you believe that the School has not complied with this notice or acted other than in accordance with data protection laws, you should notify the School's Data Protection Lead. You are at liberty to request a review of the handling of your personal data with the Information Commissioner's Office (ICO), although the ICO would generally recommend that steps are taken to resolve the matter with the School before contacting them as the regulator. Further details on the work of the ICO and information rights and legislation can be found at <http://www.ico.org.uk>

Appendix B: Privacy Notice Summary for Alumnae

Introduction

This notice is to help members of our Alumnae understand **how** and **why** we collect personal information and **what** we do with that information. It also explains the decisions that you can make about your information. **The full version of the School's Privacy Notice can be found on the school website – <https://www.piperscorner.co.uk/about-us/policies/reports-policies>**

If you have any questions about this notice please contact the school.

What is “personal information”?

Personal information is information that identifies or relates to you. For example, contact information and details of career skills. Photographs and videos of you also count as your personal information.

How and why does the School collect personal information of Alumnae?

Our primary reason for using your personal information is to maintain relationships and grow the wider Pipers Corner School community through the provision of an Alumnae group – Cornerstones.

Some of the different ways in which we use your personal information and where that personal information comes from are as follows:

- We collect information about you from your time at school. Your contact information is used to establish the relationship with the Alumnae group
- We may share your information to manage relationships with alumnae and the wider school community. This can include Alumnae events, Year Group meetings, direct marketing by the School, fundraising activity and careers support (such as requesting speakers at Careers events)
- 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) and the school newsletter

If you have any questions about how we use your personal information, please contact our Data Protection Lead (contact details in the Privacy Notice on the school website).

Appendix C: Privacy Notice Summary for Parents

Introduction

This notice is to help parents understand **how** and **why** we collect personal information and **what** we do with that information. It also explains the decisions that you can make about your information and that of your child. **The full version of the School's Privacy Notice can be found on the school website – <https://www.piperscorner.co.uk/about-us/policies/reports-policies>**

We are giving you this notice because you are able to exercise both your own data protection rights and those of your child on their behalf. When your child is older (usually when they reach the age of 13) they will be considered mature enough to exercise their own data protection rights.

If you have any questions about this notice please contact the School's Data Protection Lead (DPL) at bursar@piperscorner.co.uk.

What is “personal information”?

Personal information is information that the School holds about you and your child. This includes information such as your contact details, your child's date of birth and address as well as records such as examination results, medical details and behaviour reports. The School may also record your child's religion or ethnic group. CCTV, photos and video recordings of your child are also personal information.

How and why does the School collect personal information?

Our primary reason for using your personal information is to fulfil our legal obligations and duties under the contract to provide your children with an education.

The admissions forms which you complete give us lots of personal information. We also get information from your child, your child's teachers and other students. In addition, your child's old school may give us information if we need this to teach and care for them.

Sometimes we get information from your child's doctor and other professionals where we need this to look after them.

We collect this information to help the School run properly and safely, and to let others know what we do here. Here are some examples:

- We need to tell all appropriate members of staff if a student is allergic to something or might need extra help with some tasks
- We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms.
- We may need to report some of your child's information to the government. For example, we may need to tell the local authority that your child attends the School or let them know if we have any concerns about a student's welfare
- If your child is from another country we have to make sure that they have the right to study in the UK. We might have to provide information to UK Visas and Immigration
- Depending on where students go when they leave us we may need to provide information to other schools, colleges and universities or potential employers. For example, we may share information about examination results and provide references. We may need to pass on information which they need to look after your child
- If your child takes public examinations, we will need to share information about them with examination boards. For example, if your child requires extra time in examinations
- We may need to share information with the police or our legal advisers if something goes wrong or to help with an inquiry. For example, if one of your child's classmates is injured at School, or if there is a burglary
- We may share some information with our insurance company to make sure that we have the insurance cover that we need

- We may share your child's academic and (where fair) behaviour records with you or their education guardian so you can support their schooling
- We will only share your child's 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
- We will monitor your child's use of school IT services, the internet within school and school mobile electronic devices e.g. iPads. This is to check that your child is not misbehaving when using this technology or putting themselves at risk of harm. If you would like more information about this you can read the Acceptable Use of ICT Policy for students
- We may use photographs or videos of our students on the School's website and social media sites or in printed publications to show prospective students what we do here and to advertise the School. We may also share information about school activities and student achievements with external media outlets. We may continue to use these photographs and videos after your child has left the School
- Sometimes we use photographs and videos for teaching purposes, for example, to record students' drama lessons. If you have any concerns about this please contact the School's DPL at bursar@piperscorner.co.uk
- We may send your child's information to, or store her information in, other countries compliant with EU GDPR when:
 - we store information on computer servers based overseas
 - we provide updates to you when your child is on a school trip abroad
- We may keep details of your child's contact details when they leave so we can send them the School magazine and find out how they are getting on. We may also keep your child's details as an alumnae of the school and communicate with them about developments and changes. We will obtain separate agreement from them to do this

If you have any concerns about any of the above, please contact the School's DPL at bursar@piperscorner.co.uk.

What do we do with your personal information?

The Bursar is the School's DPL and is responsible at our School for managing how we look after personal information and deciding how it is shared. The Bursar can be contacted at Bursar@piperscorner.co.uk.

Like other organisations, we need to keep your information, and that of your child, 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.

For how long do we keep your child's information?

The general rule is that we will keep student information on file until a student reaches the age of 25.

There may be specific reasons to keep items of data for longer periods, for example for the School archive, and the School's Information and Records Retention Policy provides full details of our procedures regarding student data retention.

Our legal grounds for using your child's information

As a School we have to comply with various laws and this entitles us to use both your information and that of your child where necessary. For example, we have to make sure that we take care of our students properly.

Unless this would be unfair to you or your child, we have a legitimate interest in using their information in order to:

- educate your child and others
- look after your child's welfare and the welfare of others
- We also use your child's information in order to provide education
- We may need to use your child's information in connection with legal disputes

- We have a contract with you to educate and look after your child. We are allowed to use information about you and your child where this is necessary to comply with our contractual obligations
- We may ask for you or your child's consent to use their information in certain ways
- We are allowed to use your child's information in an emergency, for example, if they require urgent medical attention
- We may use information about your child if we need to for historical, research or statistical purposes

What decisions can you make about your information and your child's information

- If you would like us to correct, change or update the information we hold about you or your child please contact the School's DPL at bursar@piperscorner.co.uk
- You can also ask what information we hold about you and/or your child and be provided with a copy. We will also give you extra information, such as why we use the information, where it came from and what types of people we have sent it to
- If you would prefer that we keep certain information confidential then please contact the School's DPL at bursar@piperscorner.co.uk
- If we ask for your consent to use your child's personal information you can take back this consent at any time
- You can ask us to delete or restrict the use of your child's information in certain circumstances
- You can ask us to send you, or another organisation, certain types of information about your child. The Bursar can give you more information about this right

Further information and guidance

- This notice is to explain how we look after your personal information and your child's personal information.
- If you have any questions you can contact the School's DPL at bursar@piperscorner.co.uk about how it works in our School.
- If you consider that we have not acted properly when using your personal information or your child's personal information you can contact the Information Commissioner's Office (ICO) for review: <http://www.ico.org.uk>. The ICO also provide a range of guidance and support in regard to the application of Data Protection Legislation.

Appendix D: Privacy Notice Summary for Students

Introduction

This summary notice is to help students understand **how** and **why** we collect your personal information and **what** we do with that information. **The full version of the School's Privacy Notice can be found on the school website - <https://www.piperscorner.co.uk/about-us/policies/reports-policies>**

We are giving you this notice because you are mature enough to make decisions about your personal information.

If you have any questions about this notice please talk to your Head of Year.

What is "personal information"?

Personal information is information that the School holds about you. This includes information such as your name, date of birth and address, as well as things like examination results, medical details and behaviour records. The School may also record your religion or ethnic group. CCTV, photos and video recordings of you are also personal information.

How and why does the School collect personal information?

Admissions forms give us lots of personal information. We get information from you, your parents, your teachers and other students. Your old school may also give us information about you so that we can teach and care for you.

Sometimes we get information from your doctor and other professionals when we need it to look after you.

We collect this information to help the School run properly and safely, and to let others know what we do here. Here are some examples:

- We need to tell your teachers if you are allergic to something or might need extra help with some tasks.
- We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms.
- We may need to report some of your information to the government. For example, we may need to tell the local authority that you attend the School or let them know if we have any concerns about your welfare.
- If you are from another country we have to make sure that you have the right to study in the UK. We might have to provide information to UK Visas and Immigration which is part of the Home Office.
- Depending on where you will go when you leave us we may need to provide your information to other schools, colleges and universities or potential employers. For example, we may share information about your examination results and provide references. We may need to pass on information which they need to look after you.
- When you take public examinations (e.g. GCSEs) we will need to share information about you with examination boards. For example, if you require extra time in your examinations.
- We may need to share information with the police or our legal advisers if something goes wrong or to help with an inquiry. For example, if one of your classmates is injured at School, or if there is a burglary.
- We may share some information with our insurance company to make sure that we have the insurance cover that we need.
- We may share your academic and (where fair) your behaviour records with your parents or education guardian so they can support your schooling.
- 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.
- We will monitor your use of school email, school internet services and school mobile electronic devices e.g. iPads. This is to check that you are not misbehaving when using this technology or

putting yourself at risk of harm. If you would like more information about this you can read the Acceptable Use of ICT Policy.

- We may use photographs or videos of you for the School's website and social media sites or printed publications to show prospective students what we do here and to advertise the School. We may also share information about school activities and student achievements with external media outlets such as local papers. 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 your drama lessons.
- We may store your information in countries also compliant with relevant Data Protection Law. Occasionally information may be shared to other countries to support the management of school trips abroad
- We may keep your contact details when you leave so we can send you the School magazine and find out how you are getting on. We may also keep your details as an alumnae of the School and communicate with you about developments and changes in the School. We will obtain separate agreement from you to do this.

If you have any concerns about the above, please talk to your Head of Year.

What do we do with your personal information?

The Bursar is the person responsible at our School for managing how we look after personal information and deciding how it is shared. The Bursar can be contacted at Bursar@piperscorner.co.uk.

Like other organisations, we need to keep your information 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.

For how long do we keep your information?

The general rule is that we will keep student information on file until a student reaches the age of 25.

There may be specific reasons to keep items of data for longer periods, for example for the School archive, and the School's Information and Records Retention Policy provides full details of our procedures regarding student data retention.

Our legal grounds for using your information

As a School we have to comply with various laws and this entitles us to use your information where necessary. For example, we have to make sure that we take care of you properly.

Unless this would be unfair to you, we have a legitimate interest in using your information in order to:

- educate you and others
- look after your welfare and the welfare of others.
- We also use your information in order to provide education, which is in the public interest
- We may need to use your information in connection with legal disputes
- We have a contract with your parents to educate and look after you. We are allowed to use information about you where this is necessary to comply with our contractual obligations
- We may ask for your consent to use your information in certain ways
- We are allowed to use your information in an emergency, for example, if you require urgent medical attention
- We may use information about you if we need to for historical, research or statistical purposes
- What decisions can you make about your information?
- If you would like us to correct, change or update the information we hold about you please speak to your Head of Year
- You can also 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, where it came from and what types of people we have sent it to

- If you would prefer that we keep certain information confidential then please speak to your Head of Year

Since May 2018 you have been able to make even more decisions about your information, for example:

- If we ask for your consent to use your personal information you can take back this consent at any time
- You can ask us to delete or restrict the use of your information in certain circumstances
- You can ask us to send you, or another organisation, certain types of information about you. The Bursar can give you more information about this right

Further information and guidance

This summary notice is to explain how we look after your personal information.

If you have any questions you can ask your Head of Year about how it works in our School. The Bursar is in charge of the School's data protection compliance. You can ask your Head of Year to speak to the Bursar or speak to Bursar yourself. Alternatively, 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.

Appendix E: Privacy Notice for Staff

Introduction

In the course of your employment, engagement or other basis of work undertaken for the School, we will collect, use and hold ("process") personal data relating to you as a member of our staff. This makes the school a data controller of your personal information, and this Privacy Notice sets out how we will use that information and what your rights are.

Our duties in respect of personal data are very important to us and we are committed to using the personal data we hold in accordance with the law. The School's Data Protection Lead (DPL) is responsible for data protection at the School and will endeavour to ensure that the School complies with its responsibilities. Any queries should be directed to the DPL by email at bursar@piperscorner.co.uk.

Who this document applies to

All staff members, contractors, itinerant teachers, casual workers, temps and volunteers who may be employed or engaged by the school to work for it in any capacity, as well as prospective applicants for roles. It also applies to Governors (trustees and directors).

This notice does not inform staff how to handle the personal data of parents and students. This information may be found in the full version of the School's Privacy Notice which can be found on the school website - <https://www.piperscorner.co.uk/about-us/policies/reports-policies> and provides further details about how personal data will be used by the school. The School Data Protection Policy also provides guidance on the management of data in the School.

About this document

This Staff Privacy Notice explains how the school collects, uses and shares (or "processes") personal data of staff, and your rights in relation to the personal data we hold.

This Privacy Notice also applies in addition to the school's Terms and Conditions document and other relevant policies, including:

- any contract between the school and its staff, such as the terms and conditions of employment and the Pipers Staff Handbook
- the school's Information and Records Retention Policy
- the school's Safeguarding, Pastoral, Anti-bullying and Health and Safety Policies, including how concerns or incidents are reported or recorded (both by and about staff)
- the school's Acceptable Use of ICT Policy

Please note that your contract with the school, including any document or policy forming a part of your contractual obligations to the school, may in particular be relevant to and supplement the information in this Staff Privacy Notice, to the extent that it will contain details of obligations or rights of the school under contract with you which may require the use of your personal data. However, this Staff Privacy Notice is the primary document applicable to the use of your personal data by the school.

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

How we collect your information

We may collect your personal data in a number of ways, for example:

- When you submit a formal application to work for us and provide your personal data in application forms and covering letter
- From third parties, for example the Disclosure and Barring Service (DBS) and referees (including your previous or current employers or school), in order to verify details about you and your application to work for us

More generally, during the course of your employment with us, as a member of staff, we will collect data from or about you, including:

- when you provide or update your contact details
- when you or another member of staff completes paperwork regarding your performance appraisals
- in the course of fulfilling your employment (or equivalent) duties more generally, including by filling reports, note taking, or sending emails on school systems about you
- in various other ways as you interact with us during your time as a member of staff, and afterwards, where relevant, for the various purposes set out below

The types of information we collect

We may collect the following types of personal data about you (and your family members and 'next of kin', where relevant). This list is not exhaustive but is intended to give you a clear idea of the personal information we hold and process:

Contact and communications information, including for example, emergency contact information for your family:

- Your contact details (including email address(es), telephone numbers and postal address(es))
- Contact details (through various means, as above) for your family members and 'next of kin', in which case you confirm that you have the right to pass this information to us for use by us in accordance with this Privacy Notice
- Records of communications and interactions we have had with you

Biographical, educational and social information, including:

- Your name, title, gender, nationality and date of birth
- Your image and likeness, including as captured in photographs taken for work purposes
- Details of your education and references from your institutions of study
- Lifestyle information and social circumstances
- Your interests and extra-curricular activities

Financial information, including:

- Your bank account number(s), name(s) and sort code(s) (used for paying your salary and processing other payments)
- Your tax status (including residence status)
- Information related to pensions, national insurance, or employee benefit schemes

Work related information, including:

- Details of your work history and references from your previous employer(s)
- Your personal data captured in the work product(s), notes and correspondence you create while employed by or otherwise engaged to work for Pipers Corner School
- Details of your professional activities and interests
- Your involvement with and membership of sector bodies and professional associations
- Information about your employment and professional life after leaving the school, where relevant (for example, where you have asked us to keep in touch with you)

And any other information relevant to your employment or other engagement to work for the school. Where this is necessary for your employment or other engagement to work for us, we may also collect special categories of data (also known as sensitive personal data), and information about criminal convictions and offences, including:

- Information revealing your racial or ethnic origin.
- Trade union membership, where applicable.
- Information concerning your health and medical conditions (for example, where required to monitor and record sickness absences, dietary needs, or to make reasonable adjustments to your working conditions or environment).
- Information concerning your sexual life or orientation (for example, in the course of investigating complaints made by you or others, for example concerning discrimination).
- Information about certain criminal convictions (for example, where this is necessary for due diligence purposes, or compliance with our legal and regulatory obligations).

However, this will only be undertaken where and to the extent it is necessary for a lawful purpose in connection with your employment or other engagement to work for the school.

The basis for processing your personal data, how that data is used and whom it is shared with

Entering into, or fulfilling, our contract with you

We process your personal data because it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract, such as a contract of employment or other engagement with us. In this respect, we use your personal data for the following:

- Administering job applications and where relevant, offering you a role with us
- Carrying out due diligence checks on you, whether during the application process for a role with us or during your engagement with us, including by checking references in relation to your education and your employment history
- Once you are employed or engaged by us in any capacity, for the performance of the contract of employment (or other agreement) between you and us
- To pay you and to administer benefits (including pensions) in connection with your employment or other engagement with us.
- Monitoring your attendance and your performance in your work, including in performance appraisals
- Promoting the school to prospective parents and others, including by publishing the work product(s) you create while employed by or otherwise engaged to work for the school
- For disciplinary purposes, including conducting investigations where required
- For other administrative purposes, for example to update you about changes to your terms and conditions of employment or engagement, or changes to your pension arrangements
- For internal record-keeping, including the management of any staff feedback or complaints and incident reporting
- For any other reason or purpose set out in your employment or other contract with us

Legitimate interests

We process your personal data because it is necessary for our (or sometimes a third party's) legitimate interests. Our "legitimate interests" include our interests in running the school in a professional, sustainable manner, in accordance with all relevant ethical, educational, charitable, legal and regulatory duties and requirements (whether or not connected directly to Data Protection Law). In this respect, we use your personal data for the following:

- Providing you with information about us and what it is like to work for us (where you have asked for this, most obviously before you have made a formal application to work for us)
- For security purposes, including by operating security cameras in various locations on the school's premises
- To enable relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate
- To provide education services to students
- To safeguard the students' welfare and provide appropriate pastoral care
- To carry out or cooperate with any school or external complaints, disciplinary or investigatory process
- For the purposes of management planning and forecasting, research and statistical analysis.
- In connection with organising events and social engagements for staff
- Making travel arrangements on your behalf, where required
- Contacting you or your family members and 'next of kin' for business continuity purposes, to confirm your absence from work
- Publishing your image and likeness in connection with your employment or engagement with us
- To log use of the school's IT and communications systems in accordance with the school's Acceptable Use of ICT and government guidance such as Keeping Children Safe in Education from the Department for Education (KCSIE)

Legal obligations

We also process your personal data for our compliance with our legal obligations, notably those in connection with employment, charity law, company law, tax law and accounting and child welfare. In this respect, we use your personal data for the following:

- To meet our legal obligations (for example, relating to child welfare, social protection, diversity, equality, and gender pay gap monitoring, employment, and health and safety)
- For tax and accounting purposes, including transferring personal data to HM Revenue and Customs to ensure that you have paid appropriate amounts of tax
- For the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities

Special categories of data

We process special categories of personal data (such as data concerning health, religious beliefs, racial or ethnic origin, sexual orientation or union membership) or criminal convictions and allegations for the reasons set out below.

We will process this data on the basis that such processing is necessary to carry out obligations and exercise rights (both yours and ours) in relation to your employment.

In particular, we process the following types of special category personal data for the following reasons:

- Your physical or mental health or condition(s) in order to record sick leave and understand your fitness for work, or (in emergencies) act on any medical needs you may have
- Recording your racial or ethnic origin in order to monitor our compliance with equal opportunities legislation
- Trade union membership, in connection with your rights as an employee and our obligations as an employer
- Categories of your personal data which are relevant to investigating complaints made by you or others, for example concerning discrimination, bullying or harassment
- Data about any criminal convictions or offences committed by you, for example when conducting criminal background checks with the DBS, or where it is necessary to record or report an allegation (including to police or other authorities, with or without reference to you)
- We will process special categories of personal data for lawful reasons only, including because:
- You have given us your explicit consent to do so, in circumstances where consent is appropriate
- It is necessary to protect your or another person's vital interests, for example, where you have a life-threatening accident or illness in the workplace and we have to process your personal data in order to ensure you receive appropriate medical attention
- It is necessary for some function in the substantial public interest, including the safeguarding of children or vulnerable people, or as part of a process designed to protect others from malpractice, incompetence or unfitness in a role (or to establish the truth of any such allegations)
- It is necessary for the establishment, exercise or defence of legal claims, such as where any person has brought a claim or serious complaint against us or you

Sharing your information with others

For the purposes referred to in this privacy notice and relying on the requirements for processing as set out above, we may share your personal data with certain third parties. We may disclose limited personal data (including in limited cases special category or criminal data) to a variety of recipients including:

- Other employees, agents and contractors (e.g. third parties processing data on our behalf as part of administering payroll services, the provision of benefits including pensions, IT etc. when acting as a data processor on our behalf)
- DBS and other relevant authorities and agencies such as the Department for Education, National College for Teaching and Leadership, the Information Commissioner's Office, Charity Commission and the local authority
- External auditors or inspectors
- Our advisers where it is necessary for us to obtain their advice or assistance, including insurers, lawyers, accountants, or other external consultant

- When the school is legally required to do so (by a court order, government body, law enforcement agency or other authority of competent jurisdiction), for example HM Revenue and Customs or the police

We may also share information about you with other employers in the form of a reference, where we consider it appropriate, or if we are required to do so in compliance with our legal obligations.

For how long do we keep your information?

Personal data relating to unsuccessful job applicants is deleted within six months at the end of the application process, except where we have notified you we intend to keep it for longer (and you have not objected).

For employees, subject to any other notices that we may provide to you, we will retain your personal data for a period of six years after your contract of employment (or equivalent agreement) has expired or been terminated.

However, some information may be retained for longer than this, for example incident reports and safeguarding files, in accordance with specific legal requirements. Please see the School's Information and Records Retention Policy.

Your rights

You can find out more about your rights under applicable data protection legislation from the Information Commissioner's Office website available at <http://www.ico.org.uk>.

This notice

The School may update this Staff Privacy Notice Summary from time to time.

Contact and complaints

If you have any queries about this privacy notice or how we process your personal data, or if you wish to exercise any of your rights under applicable law, you may contact your line manager / or refer the matter through the staff grievance procedure.

If you believe that the School has not complied with this notice or acted other than in accordance with data protection laws, you should notify the School's Data Protection Lead. You are at liberty to request a review of the handling of your personal data with the Information Commissioner's Office (ICO), although the ICO would generally recommend that steps are taken to resolve the matter with the School before contacting them as the regulator. Further details on the work of the ICO and information rights and legislation can be found at <http://www.ico.org.uk>.