



QUEEN ETHELBURGA'S COLLEGIATE PRIVACY NOTICE FOR PARENTS, GUARDIANS AND STUDENTS

<p>Reviewed: 31 July 2023</p> <p>Due for review: July 2024</p>	<p>This Privacy Notice has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:</p> <p>Education (Independent School Standards) Regulations 2014</p> <p>General Data Protection Regulation 2016</p> <p>UK General Data Protection Regulation (UK GDPR, 1 January 2021)</p> <p>Data Protection Act 2018 (DPA)</p> <p>Keeping children safe in education 2023, in force from 1 September 2023</p> <p>Working Together to Safeguard Children 2018 (updated July 2022)</p> <p>National minimum standards for boarding schools, in force from 5 September 2022</p> <p>Statutory framework for the Early Years Foundation Stage (DfE, 31 March 2014, updated 12 July 2023) Applies from 4 September 2023</p>	<p>To be viewed alongside the following related policies and documentation:</p> <p>Acceptable Use Policies – staff and student</p> <p>Anti-bullying Policy</p> <p>CCTV Policy</p> <p>Child Protection and Safeguarding Policy</p> <p>Equality, Diversity and Inclusion Policy</p> <p>E-safety -Digital Wellbeing Policy</p> <p>Medical Policy with First Aid Policy</p> <p>Pastoral Care Policy Statement</p>	<p>Publication and availability for Staff, Parents, Carers and Prospective Parents:</p> <p>This Privacy Notice is published on the QE website and on the Parent Portal. It is available to staff on SharePoint.</p>
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1. Introduction

This notice explains how each of Queen Ethelburga's Collegiate - Queen's Kindergarten, Chapter House Preparatory School, King's Magna Middle School, Queen Ethelburga's College, The Faculty of Queen Ethelburga's and Queen Ethelburga’s Services (QES) – hereafter referred to as “**the Collegiate**” processes your personal information/data. This notice also applies to Queen Ethelburga’s holiday programmes, including Holidays@QE; QE Summer Schools; and Camp QE. In this document "we" "us" or "our" means the Collegiate or any part of it.

1.1. We aim to comply with the General Data Protection Regulation (the **UK GDPR**) and the Data Protection Act 2018, when processing your personal information. The purpose of the data protection regulation is to safeguard information about people (referred to in the UK GDPR as **Personal Data**) and covers issues such as data security, individuals' rights to access information about them held by the Collegiate, and the use and disclosure of Personal Data.

1.2. This document is commonly known as a "privacy notice".



- 1.3. We are the **Data Controller** of Personal Data about students and their parents and/or guardians. This means that we are responsible for compliance with the relevant legislation.
- 1.4. This notice also applies to prospective students and their parents and / or guardians.
- 1.5. The Collegiate has appointed Mr R. Holdsworth as our Data Protection Officer (**DPO**). Any questions you have in relation to this policy on or after this date should be directed to the DPO at dpo@qe.org.

2. How we acquire Personal Data

- 2.1. We acquire Personal Data in several ways including, without limitation, the following:
 - 2.1.1. parents of students provide us with Personal Data about themselves or their family in correspondence, forms, documents, during discussions with staff, and through our website;
 - 2.1.2. we acquire Personal Data from other parents, or from people outside of the community who know parents or from the students themselves; and
 - 2.1.3. we acquire Personal Data from third parties such as schools and nurseries, public authorities, public sources or from commercial sources such as credit reference agencies.

3. Why we collect Personal Data

- 3.1. We commonly use Personal Data for:
 - 3.1.1. ensuring that we provide a safe and secure environment;
 - 3.1.2. providing pastoral care;
 - 3.1.3. providing education and learning for students;
 - 3.1.4. enabling students to take part in examinations and assessments, and to monitor students' progress and educational needs;
 - 3.1.5. providing additional activities for students and parents, for example, activity clubs and educational visits;
 - 3.1.6. protecting and promoting our interests and objectives - this includes fundraising;



- 3.1.7. legal and management purposes and to enable the Collegiate to meet its legal obligations as an employer, for example to pay staff, and to monitor their performance;
 - 3.1.8. to gauge how well the Collegiate is performing;
 - 3.1.9. safeguarding and promoting the welfare of students; and
 - 3.1.10. fulfilling our contractual and other legal obligations.
- 3.2. Personal Data processed by us includes contact details (including names, addresses, telephone numbers and e-mail addresses), medical/health information, disciplinary records, pastoral, admissions and attendance records, information relating to special educational needs and images of students engaging in Collegiate activities (and in relation to parents and/or guardians, may include financial or other payment information). It may also include online identifiers such as IP addresses.
- 3.3. We also process Special Category Personal Data such as information about parents' and/or students' ethnic group, marital status, religious beliefs, and relevant medical information.
- 3.4. We share Personal Data with third parties where doing so complies with the relevant legislation. For example, we may
- 3.4.1. disclose parent / student information to the relevant statutory agencies (such as with UK Visas and Immigration, Local Authority safeguarding teams, Her Majesty's Revenue and Customs, Department of Education, Department of Works and Pension.) where we need to share information to comply with our reporting obligations or for safeguarding reasons;
 - 3.4.2. disclose details of a student's medical condition where it is in the student's interests to do so, for example for medical advice, insurance purposes or to organisers of school trips;
 - 3.4.3. share parent contact details and financial information with debt recovery organisations or with associated companies, where this is necessary for financial administration;
 - 3.4.4. disclose information to fraud prevention or credit reference agencies;
 - 3.4.5. share information about parents and students with our solicitors or other professional advisors (for example, to obtain legal advice); and



- 3.4.6. share information with bodies such as UCAS, universities, careers advisory services or those providing external assessment, where this is in the interest of supporting educational provision.
- 3.5. We share information about a student with their parents where permitted by the relevant legislation, for example, information about the student's academic attainment, behaviour, and progress.
- 3.6. We use Personal Data for other purposes where the relevant legislation allows and where providing an explanation would not be appropriate - this includes for the prevention and investigation of crime and the prosecution of offenders.
- 3.7. Our aims are:
 - 3.7.1. to record sufficient information for the purpose, but not unnecessary information;
 - 3.7.2. to record Personal Data accurately and to keep it up to date;
 - 3.7.3. not to use Personal Data in ways which are incompatible with the purpose for which it was originally recorded;
 - 3.7.4. not to transfer Personal Data outside the European Economic Area unless we have the express permission of the individual, or have made appropriate arrangements with the recipient to ensure that the individual's privacy rights are protected;
 - 3.7.5. to have appropriate security arrangements in place to help prevent any unauthorised use of, or accidental loss or damage to, Personal Data. This includes using encryption and other technologies where appropriate;
 - 3.7.6. to dispose of Personal Data appropriately after it is no longer needed. This includes:
 - 3.7.6.1. shredding papers securely where appropriate; and
 - 3.7.6.2. permanently deleting information from computers and memory devices before they are disposed of.
 - 3.7.7. to be fair to the subject of the information and to whoever provides it (if that is someone else).
- 3.8. The Collegiate will retain pupil files in accordance with the relevant legislation and statutory requirements e.g., pupil files are kept until 25 years from the date of birth. On occasion we may need to keep certain records for an extended period (even indefinitely). For example, we may need to keep records for longer if there are safeguarding concerns or if you threaten to bring a claim against the Collegiate.
- 3.9. We share information between the schools in the Collegiate where doing so complies with the relevant legislation. For example, where a student moves from King's Magna Middle School to Queen Ethelburga's College or to the Faculty of Queen Ethelburga's.
- 3.10. We will continue to use Personal Data of students after those students have left the Collegiate where doing so is allowed by the UK GDPR and the Data Protection



Act 2018. For example, marketing photos of students who have since left the Collegiate may still be used to promote the Collegiate.

- 3.11. DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

4. Data protection compliance: specific examples

4.1. CCTV

- 4.1.1. We use CCTV recordings as a proportionate and justified response, for the purposes of crime prevention and investigation and in connection with our obligation to safeguard the welfare of students, staff, and visitors to our site and when being transported in Collegiate vehicles. The Collegiate regularly checks compliance with its procedures on the use of CCTV, as detailed in the Collegiate's CCTV Policy. Further information about the use of CCTV can be found in the CCTV policy, available from the school office.
- 4.1.2. CCTV recordings will be disclosed to third parties such as the police but only where such disclosure is in accordance with the UK GDPR and the Data Protection Act 2018.

4.2. Photographs and publicity

- 4.2.1. We use photographs and other media of children for marketing and promotion purposes, including in Collegiate publications, in social media and on the Collegiate website. We also allow external publication of media where appropriate (for example, in a local newspaper).
- 4.2.2. When we use student images in marketing material, we will use legitimate interest (LI) as our processing condition. When we use LI as the basis for processing data, we will always undertake an LI assessment where the rights of the students and / or parents are considered.
- 4.2.3. If we use an individual in any material, we will make them and their parents aware of such material.
- 4.2.4. Parents and students can always opt out of any marketing / promotions / publicity. This can be done even if they have previously consented to their photos being used. To opt out please contact the Data Protection Officer at dpo@qe.org. The DPO will then make the necessary changes.
- 4.2.5. When it has been identified that there are greater privacy concerns, we will seek the consent of the individual or their parents. For example, if a



student is to be specifically highlighted as part of a promotion or if the student is under 10 and is to be named in any article.

4.2.6. If consent is required, then it will be sought as follows:

4.2.6.1. where the student is in Year 7 or below, permission will be sought from a parent or guardian;

4.2.6.2. where the student is in Year 8, 9, 10 or 11 then consent will be sought from the student, and the parent / guardian will be notified as appropriate;

4.2.6.3. if the student is in Year 12 or 13 then only the student's consent will be sought.

4.2.7. Occasionally, parents may ask us to keep information about a student confidential. For example, they may ask us to not use photographs of a student in promotional material or ask us to keep the fact that a student is on the school roll confidential. If parents would like information about a student to be kept confidential, they must immediately contact the Principal in writing, requesting an acknowledgment of their letter.

4.3. Our Website

4.3.1. We publish information about Collegiate fixtures and events on our Parent Portal. This makes it easier for parents and students to find out about upcoming events and gather other information. The information published includes the full name of the students taking part, as well as information about the students' availability to take part in the event. The information is available to anyone who accesses our Parent Portal.

4.4. Fees

4.4.1. We make enquiries of students' previous schools for confirmation that all sums due and owing to such schools have been paid. We also inform other schools or educational establishments to which students are to be transferred if any of our fees are unpaid.

4.5. Fundraising, Clubs and Alumni Associations

4.5.1. We use information about parents, former students, and others in connection with fundraising and promoting the interests of the Collegiate. For example, we contact individuals who we consider might be interested in supporting the Collegiate in connection with a specific fundraising activity.

4.6. References

4.6.1. We share the Personal Data of students and parents with other educational establishments for the purpose of providing a reference.



4.7. Examination results and pupil achievement

- 4.7.1. We publish examination results and university destinations in our own marketing materials and in the press that might include details of grades achieved and subjects taken, as well as university destination. We also publish information about achievement, for example where a student has performed particularly highly when grades and subjects of qualifications may be stated. Where this involves sharing sensitive personal data, consent will be sought.

4.8. Your rights under the UK GDPR and Data Protection Act 2018

- 4.8.1. Requesting access to your personal data
- 4.8.1.1. Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact [setting to include details of their administrator / Data Protection Officer]
- 4.8.1.2. You also have the right to:
- to ask us for access to information about you that we hold
 - to have your personal data rectified if it is inaccurate or incomplete
 - to request the deletion or removal of personal data where there is no compelling reason for its continued processing
 - to restrict our processing of your personal data (i.e., permitting its storage but no further processing)
 - to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
 - not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you
 - request data portability of their data which we hold to another data controller (subject to certain conditions being met)
- 4.8.1.3. If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk>



4.9. Further Information

4.9.1. Full details of your rights and further information can be found in the Data Protection Policy which is available on request and on our website.

4.9.2. **ICO website:** Further details of the Personal Data that we hold, and how we use it, can be found in our register entries on the Information Commissioner's website under the following registration numbers:

- Chapter House Preparatory School Limited - registration number Z5580819
- KM School Limited - registration number Z2801031;
- Queen Ethelburga's College Limited - registration number Z520742X;
- Faculty of Queen Ethelburga's Limited - registration number ZA167783.

This website also contains information about the Collegiate's Data Protection and Privacy Policy.

The purpose of this notice is to explain how we use Personal Data about students and parents. It does not, and is not intended to, place any obligation on us greater than that set out in the relevant legislation.

Contact: If you would like any further information about anything within this notice then please contact the Data Protection Officer at dpo@qe.org