

PRIVACY NOTICE FOR OLDER STUDENTS

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| Policy Owner PPS Director of Operations and Finance | Applies to Prior Park Schools (Trust Wide) | Superseded documents Privacy Notice_Older Students v1 |
| Associated documents E-Safety Policy Safeguarding Policy Prevent Duty Policy Data Protection and associated policies and procedures ICT Systems Policy Mobile Devices Policy Social Media Policy Taking, Storing and Using Images Policy CCTV Policy | Review frequency Every three years (unless the legislation/regulations update before this time) Implementation date 25 September 2024 | Legal Framework Data Protection Act 2018 KCSIE Working together to safeguard children |

This policy is reviewed triennially, or more regularly as required, prior to approval by Trustees, where applicable.

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| Last reviewed by: | Head of Compliance (Miss E Wickham) |
| Date last reviewed: | August 2024 |
| Approved by Trustees: | Approved by Director of Operations and Finance (Ms E Sandberg) |
| Date last approved: | 1 September 2024 |
| Date for next approval: | September 2027 |

1. Introduction

Prior Park Schools (PPS) is a family of Christian schools based in Bath and Gibraltar. Prior Park College (PPC) and The Paragon School (TP) are incorporated in England as Prior Park Educational Trust Ltd. Prior Park School Gibraltar (PPSG), is incorporated in Gibraltar as Prior Park School Ltd. Both are companies limited by guarantee and registered charities.

The Prior Park Schools mission, underpinned by shared values, is to steward a thriving family of communities with love for the young people they serve at their heart. These vibrant communities cultivate creativity, foster integrity, and transform lives.

Prior Park Schools Values:

Curiosity - Generosity - Courage

HOW WE USE YOUR INFORMATION - PRIVACY NOTICE for OLDER STUDENTS

2. How we use your information

Privacy Notice for Older Students (those over the age of 13)

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

2.2 An older student is one who is 13 years old or more. We are giving you this notice because we consider that you are mature enough to make decisions about your personal information.

2.3 Safeguarding and Child Protection requirements always override data protection considerations. If information should be shared in the interests of safeguarding or acute child protection matters, data protection requirements and this policy can never be used as a reason not to do so.

2.4 If you have any questions about this notice please talk to your form tutor, pastoral head or housemistress.

3. What is Personal Data?

3.1 Personal data is information that the School collects about you.

3.2 This includes information such as your name, date of birth and address as well as things like exam results, medical details and behaviour records.

3.3 The School may also record sensitive personal data such as your medical records, religion or ethnic group.

3.4 CCTV, photos and video recordings of you are also personal information.

4. How and Why does the School collect Personal Data?

4.1 Admissions forms give us lots of personal information. Your old school also gives us information about you. We get information from you, your teachers and other students. Sometimes we get information from your doctors and other professionals where we need this to look after you.

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

- a. We need to tell all your teachers if you are allergic to something or might need extra help with some tasks.
- b. We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms.
- c. 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.
- d. If you are from another country, we have to make sure that you have the right to study in the UK. This process is managed by an external organisation, with whom the School has a legally binding contract regarding management of data. We might have to provide information to UK Visas and Immigration who are part of the government.
- e. 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. We may share information about your exam results and provide references.
- f. 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.
- g. We may share some information with our insurance company to make sure that we have the insurance cover that we need.
- h. We may share your academic and (where fair) your behaviour records with your parents or education guardian so they can support your schooling.
- i. We will only share your information with other people and organisations when we have a good reason to do so.
 - a. We will monitor your child's use of email, the internet and mobile electronic devices e.g. PLDs. If you would like more information about this you can read the E Safety and E Safety Acceptable Use Policy for Students or speak to your child's Tutor or Housemaster/Housemistress (HsM) or HoH
 - b. We may use photographs or videos of you for the School's website and social media sites or prospectus to show prospective students what we do here as well as for teaching purposes. We may also use photographs or videos of you in advertisements for School. We do not use your photo together with your name without your consent.

- c. We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing.
- d. We supply summary statistical information for student exam results to the national press and educational associations, for example the Independent Schools Council. However, this information would not allow you to be identified.
- e. We may on occasion use your exam results and future plans as a case study the media, but we would seek your permission first.
- f. We will keep details of your address when you leave so we can send you alumni information and find out how you are getting on. We may also pass your details onto the alumni organisation and they will seek your consent to keep in touch with you.

5. What do we do with your personal information?

The Director of Finance and Operations (DFO) is the person responsible at our School for managing how we look after personal information and deciding how it is shared.

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.

We are legally required to provide the Department for Education with certain information about you. Some of this information will be stored on the National Student Database. Organisations can request information from the National Student Database which might include information about you. But they are only allowed to do this for limited purposes, and they must be very careful about how they use your information.

In exceptional circumstances, we may keep your information for a longer time than usual or share it more widely than we would normally.

DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare.

The table below shows for how long we keep different types of your information.

| Type of information | Retention period or the criteria used to determine the retention period |
|--|--|
| Contact information | 6 years after the student has left |
| Data contained in the history of the School; for example - images of events or names on reports. | Indefinitely |
| Data contained on CCTV images | 21 days unless requested by the police and only if compliant with the GDPR |

6. What decisions can you make about your information?

You can make various decisions about your information. These rights are:

- a. If information is incorrect you can ask us to correct it.
- b. If you would like us to change or update the information we hold about you please speak to School Office, your form tutor, pastoral head or housemistress. You can also ask what information we hold about you.

- c. You can ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to.
- d. You can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information for any purpose.
- e. You can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer.
- f. Our use of data about you may be restricted in some cases. For example, if you tell us the information is incorrect we can only use it for limited purposes whilst we check accuracy.

If you would prefer, we keep certain information confidential please speak to the DFO.

7. Further information and guidance

If you have any questions, you can ask your form tutor, pastoral head or housemistress about how it works in our School. Alternatively, you can ask your parents to speak to us on your behalf.

Further information is available from the Information Commissioner's Office.

8. Sending Information to Other Countries

We may send your information to countries, which do not have the same level of protection for personal information as there is in the UK. For example, we may:

- a. store your information on cloud computer storage based overseas or
- b. communicate with you by email when you are overseas (for example, when you are on holiday or when you have provided an address, whose server is overseas).

The European Commission has produced a list of countries, which have adequate data protection rules.

If the country that we are sending your information to is not on the list or, is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland) then, it might not have the same level of protection for personal information as there is in the UK.

We will provide you with details about the safeguards in place outside of this privacy notice.

9. Our Legal Grounds for Using your Information

This section contains information about the legal basis that we are relying on when handling your information as described above.

Legitimate Interests

This means that the School is using your information when this is necessary for the School's legitimate interests except when your interests and fundamental rights override our legitimate interests.

Specifically, the School has a legitimate interest in:

- Providing educational services to you and to other children
- Safeguarding and promoting your welfare, other children and our employees
- Promoting the objects and interests of the School. This includes fundraising and using photographs of you at our school events in promotional material.
- Keeping the School buildings safe

- Using your information in connection with legal disputes. For example, if you bring a claim against the School
- Protecting the School's reputation
- Facilitating the efficient operation of the School; and
- Ensuring that all relevant legal obligations of the School are complied with (e.g. in relation to inspections).

In addition, your personal information may be processed for the legitimate interests of others. For example, another school will have a legitimate interest in knowing if you have a serious medical condition.

Necessary for Contract

We will need to use your information in order to perform our obligations under our contract with you and for you to perform your obligations as well. For example, we need your name and contact details so that we can update you on your progress and so that we can contact you, or your parents, if there is a concern.

Legal Obligation

Where the School needs to use your information in order to comply with a legal obligation, for example to report a concern to Children's Services. We may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare.

Vital Interests

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

Performance of a Task carried out in the Public Interest

The following are examples of when we use your information to perform tasks in the public interest:

- providing you with an education
- safeguarding and promoting your welfare and the welfare of other children
- facilitating the efficient operation of the School; and
- ensuring that we comply with all of our legal obligations.

The School must also comply with an additional condition where it processes special categories of personal information. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or orientation.

Substantial Public Interest

The School is also allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This is similar to "public interest" in the table above, for example, the School may use special categories of information about you with an education, to look after you and your classmates or when the School is inspected.

Employment and Social Protection Law

There may be times when the School needs to use your information because we are an employer. In addition, the School may use your information to comply with social protection law (e.g. to look after you).

Vital Interests

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

Legal Claims

We are allowed to use your information if this is necessary in relation to legal claims. For example, this allows us to share information with our legal advisors and insurers.

Medical Purposes

This includes medical treatment and the management of healthcare services.

Please note we also publish a Parents Privacy Notice and Privacy Notice for Younger Students.