

# PRIVACY NOTICE FOR OLDER STUDENTS

<p><b>Policy Owner</b></p> <p>Chief Operating Officer</p>	<p><b>Applies to</b></p> <p>Prior Park Schools (Trust Wide)</p>	<p><b>Superseded documents</b></p> <p>Privacy Notice_Older Students v2</p>
<p><b>Associated documents</b></p> <p>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</p>	<p><b>Review frequency</b></p> <p>As required (unless the legislation/regulations update before this time)</p> <p><b>Implementation date</b></p> <p>23 April 2026</p>	<p><b>Legal Framework</b></p> <p>Data Protection Act 2018 KCSIE Working together to safeguard children</p>

This policy is reviewed as required, prior to approval by Trustees, where applicable.

<b>Last reviewed by:</b>	Head of Compliance (Miss E Wickham)
<b>Date last reviewed:</b>	March 2026
<b>Approved by Trustees:</b>	NA- Approved by Chief Operating Officer (Ms E Sandberg)
<b>Date last approved:</b>	20 April 2026
<b>Date for next approval:</b>	April 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

## 2. How we use your information

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

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. 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.

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.

If you have any questions about this notice please talk to your tutor, HsM/HoH, Deputy Head or DSL.

## 3. What is Personal Data

Personal data is information that the School collects about you. This includes information such as your name, date of birth and address as well as things like your attendance records, passport, exam results, and behaviour records.

The School may also record sensitive personal data such as your medical records, SEND records, religion or ethnic group. This is called **special category data**.

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

#### **4. The categories of Personal Data we collect and process**

In order to fulfil our legal duty, the school will collect and process the following: (this list is not exhaustive)

- personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- characteristics (such as ethnicity, language, and free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- special educational needs (including the needs and ranking)
- medical and administration (such as doctor's information, child health, dental health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (such as phonics results, post 16 courses enrolled for and any relevant results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)

#### **5. How does the School collect Personal Data**

Our Admissions forms give us lots of personal information. Your parents, guardians and 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.

#### **6. Why does the school collect and use Personal Data**

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

- We need to tell all 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. 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.
- 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.
- 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.
- 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 IT Acceptable Use Policy for Students or speak to your tutor, HsM/HoH.
- 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.
- 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.
- 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.
- We may on occasion use your exam results and future plans as a case study the media, but we would seek your permission first.
- 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 but they will your consent to keep in touch with you.

## 7. What do we do with your personal information

The Chief Operating Officer (COO) is the person responsible at Prior Park Schools 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 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, admissions forms, examination results and student file (reports, medical information, behaviour information)	7 years after leaving the school
Microsoft 365 accounts- including emails, Teams and document	1 year after leaving the school
Attendance register and records	6 years after leaving the school
Accident forms	Keep on record for as long as any living victim may bring a claim (review regularly)

Safeguarding records	If a referral has been made / social care have been involved / child has been subject of a multi-agency plan; or if any risk of future claim(s): 75 years.
SEND records	Date of birth plus up to 35 years
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

## 8. Where do we store Personal Data

Personal data is stored securely in three cloud-based systems:

1. iSAMs
2. CPOMs
3. Microsoft 365

## 9. What decisions can you make about your information?

The UK GDPR gives students certain rights about how their information is collected and used.

To make a request for your personal information, or be given access to your educational record, you need to contact Ms Emma Sandberg [esandberg@priorparkschools.com](mailto:esandberg@priorparkschools.com)

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called ‘right to be informed’.
- the right to ask us for copies of your personal information we have about you – this is called ‘right of access’, this is also known as a subject access request (DSAR), data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called ‘right to rectification’.
- the right to ask us to delete your personal information – this is called ‘right to erasure’
- the right to ask us to stop using your information – this is called ‘right to restriction of processing’.
- the ‘right to object to processing’ of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to complain to the Information Commissioner if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don’t have the right to object, but you have the right to withdraw consent.

If you have a concern 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 raise a concern with ICO.

## **10. 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.

## **11. 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 other Privacy Notices on our website.