



PRIVACY NOTICE FOR PARENTS, PROSPECTIVE PARENTS and PUPILS

Responsible person: Bursar

Last reviewed: July 2021

Next review due: July 2024

Introduction

This Privacy Notice explains how we manage the personal data of parents, prospective parents and pupils in advance of the pupils formally joining St Columba's College and Preparatory School (the College). You have a legal right to be informed about how our College uses any personal information that we hold about you.

Who we are?

St Columba's College and Preparatory School is the Data Controller which means that the College is the organisation which oversees your personal information.

The postal address of the College is:

St Columba's College,
8-10 King Harry Lane,
St Albans,
Hertfordshire,
AL3 4AW.

If you want to contact us about your personal information, you can contact our Data Protection Lead, Mrs Rachel McHattie who is the Bursar, in writing. She can also be contacted via her PA, Mrs Michelle Clinch, by email at bursarpa@stcolumbascollege.org.

What this Privacy Notice is for?

This Privacy Notice is intended to provide information about how St Columba's College will use (or process) personal data about parents, prospective parents, carers or guardians (referred to in this policy as "parents") and pupils. Collectively, we refer to these individuals in the Privacy Notice as the College's community.

The Privacy Notice also explains how we collect, store and use personal data about you. This information is provided because Data Protection Law gives individuals rights to understand how their data is used. The College's community are all encouraged to read this Privacy Notice and understand the College's obligations to its entire community. (However, the College has a separate Data Protection Policy and Privacy Notice applicable to its employees and other staff).

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

This Privacy Notice applies in addition to the College's other relevant terms and conditions and policies, including:

- any contract between the College and its staff, or the parents of pupils;
- any policies or notices applicable to staff concerning the handling of personal data;
- the College's policy on taking, storing and using images of children;
- the College's CCTV policy;
- the College's biometrics policy;
- the College's retention of records policy;
- the College's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and

- the College's IT policies, including its Acceptable Use policy, Social Media policy, eSafety policy, WiFi policy.

Anyone who works for, or acts on behalf of, the College (including staff, volunteers, governors and service providers) will be subject to suitable training and/or policies commensurate with their role.

Responsibility for data protection

The College has appointed a Data Protection Lead who will deal with all of your requests and enquiries concerning the College's use of your personal data and who will endeavour to ensure that all personal data is processed in compliance with this notice and Data Protection Law.

If you want to contact us about your personal information, you can contact our Data Protection Lead using the contact details above.

Why the College needs to process personal data

In order to carry out its ordinary duties to staff, pupils and parents (including prospective parents and pupils), the College needs to process a wide range of personal data about individuals (including prospective parents and pupils, current and past, pupils or parents) as part of its daily operation.

The College also need to carry out some of this activity in order to fulfil its legal rights, duties or obligations.

Other uses of personal data will be made in accordance with the College's legitimate interests, or the legitimate interests of others, provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data. The College expects that the following uses will fall within that category of its (or its community's) "**legitimate interests**":

- For the purposes of pupil selection, to confirm the identity of prospective pupils and their parents, and retain a record if appropriate for the purposes of future applications;
- In order to successfully manage and administer the admissions process.
- We will also ask for specific consent at the time of registration or initial expression of interest to send you future information about the College (prospectuses, upcoming events such as open days, newsletters etc). You will have the option to choose not to receive these further marketing communications at any time after your initial enquiry and to withdraw this consent if previously given.
- Your personal data will be processed strictly in accordance with the DPA and GDPR and in the legitimate interests of the College in order to:
 - Communicate and promote the College's admissions events and activities (that you have consented to);
 - Advise you about the next steps in the application process (i.e. taster days, assessment dates and details, interviews, scholarship information, results, induction days);
 - Undertake bursarial assessments; and
 - Make decisions concerning admissions.
- For security purposes, including biometrics and CCTV in accordance with the College's biometrics or CCTV policy
- To carry out or cooperate with any College or external complaints, disciplinary or investigation process

- Where otherwise reasonably necessary for the College's purposes, including to obtain appropriate professional advice and insurance for the College.

In addition, the College will, on occasion, need to process **special category personal data** (concerning health, ethnicity, religion, biometrics) The reasons for this will include:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: e.g. for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of College visits who need to be made aware of dietary or medical needs;
- To provide educational services in the context of any special educational needs of a pupil;
- To provide spiritual education in the context of any religious beliefs;

When we collect personal information on our forms, we will make it clear whether there is a legal requirement for prospective parents and pupils to provide it and whether there was a legal requirement on the College to collect it. If there is no legal requirement, then we will explain why we need it and what the consequences are if it is not provided.

Types of personal data processed by the College

We may collect, hold and use the following information about our prospective parents and pupils:

For the pupil:

- Name;
- date of birth;
- address details;
- feeder and previous Colleges' information;
- Information on siblings (if given);
- College report(s) and confidential reference(s);
- reports from extracurricular activities and/or tutors (if relevant);
- Educational Psychologist report (if relevant and shared with the College);
- Medical Reports (if relevant);
- special health/food/allergies requirements (if relevant);
- Bursary application details;
- test results (internal and external);
- interview comments/results;
- passport information (and visa information if requires visa); and
- guardian/agent details (name, address, email and telephone number).
- prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special educational needs), and examination scripts and marks;
- references given or received by the College about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- photographs of pupils (and occasionally other individuals) engaging in College activities, and images captured by the College's CCTV system (in accordance with our College's policy on taking, storing and using images of children);

For the parents:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- occupation;
- details of any connection with St Columba's College and Preparatory School;
- details, if required, of parental responsibility that you may have given us when originally enquiring about the College, at the time of registration, or subsequently;
- biometric information, which will be collected and used by the College in accordance with the College's biometrics policy;
- information in relation to any bursarial request (financial information is confidentially held by the Bursar's Office);

Data about prospective parents and pupils will usually be collected directly from you but some data may be collected from third parties (for example previous schools' confidential references).

We may also collect, hold and use the following more sensitive personal information about your race or ethnicity, religious beliefs

How the College collects data

We receive personal data from our pupils directly, from their parents or carers, their previous school, local authority and/or the Department of Education). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

Who has access to personal data and with whom does the College share it?

For the most part, personal data collected by the College will remain within the College and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). However, some functions are outsourced (including e.g. cloud storage/records management). In accordance with Data Protection Law, this type of external data processing is always subject to contractual assurances that personal data will be kept securely and used only in accordance with the College's specific directions.

Occasionally, the College, including its trustees/governing board, will need to share personal information relating to its community of staff, pupils and parents with third parties, such as:

- the Department for Education (DfE). The DfE may also share information about pupils that we give to them, with other people or organisations. This will only take place where the law, including the law about data protection allows it. The National Pupil Database (the NPD) is owned and managed by the DfE and contains information about pupils in England. It provides evidence on educational performance to inform independent research, as well as studies commissioned by the DfE. The information is securely collected from a range of sources including schools, local authorities and awarding bodies;
- third parties related to Special Educational Needs and Disabilities (SEND) support, e.g. non-local authority professionals;
- College nurse;
- College counsellor;
- Child and Adolescent Mental Health Service (CAMHS) and Social Services; and
or
- the Police.

The information disclosed to these people/services will include sensitive personal information about pupils. Usually this means information about health and any special educational needs or disabilities which pupils have. We do this because these people need the information so they can support pupils. To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

Third parties may also include:

- appropriate contractors, such as visiting music teachers;
- examination boards;
- the College governors; and or
- the College alumni organisation.

Access to sensitive data

Particularly strict rules of access apply in the context of “special category” data, most notably:

- medical records; and or
- pastoral or safeguarding files.

Medical data The College needs to process such information to comply with statutory duties and to keep pupils and others safe, but the College will ensure only authorised staff can access information on a need-to-know basis. This may include wider dissemination if needed for College trips or for catering purposes. Express consent will be sought where appropriate.

However, a certain amount of any SEND pupil’s relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

Safeguarding data Staff, pupils and parents are reminded that the College is under duties imposed by law and statutory guidance including Keeping Children Safe in Education (KCSIE) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the Police.

KCSIE also requires that, whenever a child leaves the College to join another school or college, his or her child protection file is promptly provided to the new organisation. The College will retain a copy in accordance with its retention policy for material related to safeguarding matters.

For further information about this, please view the College’s Safeguarding Policy which is available on the website.

How long we keep personal data

The College will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep pupil information is up to 7 years following departure from the College (usually until the pupil’s 25th birthday unless the pupil moves to another school and, in which case, we send the pupil’s file to the new school). Our Records Retention Policy explains how long we keep information (available on request).

Incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

If you have any specific queries about how our Retention Policy is applied or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact The Data Protection Lead (details above). However, please bear in mind that the College will often have lawful and necessary reasons to hold on to some personal data even following such a request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested, we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

Transferring data internationally

Where we share data with an organisation that is based outside the European Economic Area, we will protect your data by following data protection law.

Your rights

You have the following rights:

- *to obtain access to, and copies of, the personal data that we hold about you;*
- *to require us to correct the personal data we hold about you if it is incorrect;*
- *to require us (in certain circumstances) to erase your personal data;*
- *to request that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);*
- *to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller; and*
- *to object, on grounds relating to your situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.*

Individuals have various rights under Data Protection Law to access and understand their own personal data held and processed by the College, and in some cases ask for it to be erased or amended, or to have it transferred elsewhere, or for the College to stop processing it, but subject to certain exemptions and limitations.

The College will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is generally one month, but actually fulfilling more complex or multiple requests, e.g. those involving third party information, may take 1-2 months longer).

Data accuracy and security

The College will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify Collegeadmin@stcolumbascollege.org of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the College may need to process your data, or who you may contact if you disagree.

The College will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to College systems. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

This Privacy Notice

The College will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

Queries and complaints

Any comments or queries on this policy should be directed to the Data Protection Lead, using the contact details above.

If you believe that the College has not complied with this policy or acted otherwise than in accordance with Data Protection Law, you should utilise the College complaints/grievance procedure and should also notify the Data Protection Lead. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the College before involving the regulator.

The address of the ICO is:

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF