



PARENT & PUPIL PRIVACY NOTICE

WHAT THIS PRIVACY NOTICE IS FOR

This **Privacy Notice** is intended to provide information about how the school will use (or "process") personal data about individuals including: its current, past and prospective pupils; and their parents, carers or guardians (referred to in this policy as "parents"). Collectively, we refer to these individuals in the Privacy Notice as the School's community.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff, parents and pupils are all encouraged to read this Privacy Notice and understand the school's obligations to its entire community. However, the school 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 school may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This **Privacy Notice also** applies in addition to the school's other relevant terms and conditions and policies, including Terms & Conditions; Data Protection Policy; Digital Safety Policy; CCTV Policy; Taking, Storing and Using Images of Children.

RESPONSIBILITY FOR DATA PROTECTION

- The School has appointed a Compliance Officer who will deal with all your requests and enquiries concerning the school's uses of your personal data and endeavour to ensure that all personal data is processed in compliance with this notice and Data Protection Law. Requests and enquiries should be sent to the Compliance Officer at compliance@rmsforgirls.com.

WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to provide educational services to your child and to promote the objects and interests of the school, we require the personal information as outlined below. The school expects that the following uses will fall within that category of its (or its community's) "**legitimate interests**":

- Information from admissions including details from your child's previous school and other professionals such as local authorities and doctors
- Information about family circumstances to safeguard pupils' welfare and provide appropriate pastoral care
- Any criminal proceedings or convictions which relate to you, to ensure that we safeguard your child and the school community
- CCTV for security purposes in public areas, in accordance with the school's CCTV Policy
- Photographs or recordings of you and/or your child at school functions and performances to use on the school website or social media.

- Photographs of all visitors to the school who sign-in at reception.
- Photographs of all students signing in and out of school at reception during the school day.
- Recordings of on-line lessons that students may participate in.
- We may send you information such as newsletters to keep up to date with school life and fundraising events and pass on your details to FORMS, our parent teacher association for this purpose.
- We will retain your contact information when your child leaves the school to pass on to our alumnae association and to maintain the relationship with our school community, including direct marketing and/or fundraising activity.
- For the purposes of donor due diligence and donor research, to confirm the identity of prospective donors, their background and relevant interests;
- To give and receive information and references about past, current and prospective pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the school;
- To enable the provision of careers and library service; administration of sport fixtures and teams; school trips provision and the monitoring of the school's IT and communications system in accordance with our Digital Safety Policy;
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

In addition, the school will on occasion need to process **special category personal data** (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information. These reasons will include:

- To safeguard your child's 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: for example; for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs;
- To provide educational services in the context of any special educational needs of your child;
- To provide spiritual education in the context of any religious beliefs;
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are SEN, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

This may include by way of example:

- names, addresses, date of birth, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);
- CCTV recordings and images
- bank details and other financial information, e.g. about parents who pay fees to the school, make donations to the school or to the RMS Bursary Fund;
- employment details
- records of gifts made to the school or the RMS Bursary Fund and gift aid declarations

- information that is available from publicly available sources such as Companies House, LinkedIn, company websites, property holdings etc in order to maximise the school's fundraising potential.
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- references given or received by the school about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- correspondence with and concerning staff, pupils and parents past and present; and
- images of pupils (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);
- Recordings of lessons and activities via Google classrooms and other online tools that students may participate in

HOW THE SCHOOL COLLECTS DATA

Generally, the school receives personal data from you or your child directly. This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

In some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities working with you and/or your child; or collected from publicly available resources.

As a charity, to help maximise the school's fundraising potential, to provide our supporters with an improved experience and to help us raise funds more efficiently, we occasionally undertake in house research or engage specialist agencies to carry out wealth screening activities, gathering information from publicly available sources. You can always opt out of this processing. If you would prefer us not to use your data in this way please email compliance@rmsforgirls.com.

We also use publicly available sources to carry out due diligence on donors in line with our code of ethical fundraising and to meet money laundering regulations.

WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL SHARES IT WITH

Occasionally, the school will need to share personal information relating to its community with third parties, such as:

- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- government authorities (e.g. HMRC, the Charity Commission, DfE, UKVI, police or the local authority);
- appropriate regulatory bodies (e.g. Independent School's Inspectorate (ISI), the Information Commissioner)
- examination boards
- providers of transport, school trips, school sports, extra-curricular activities and after school clubs
- other schools that your child goes on to attend
- online learning resources for educational purposes
- trusted third party wealth screening agencies who review information which is available in the public domain

For the most part, personal data collected by the school will remain within the school, and will be processed by appropriate members of staff in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- medical records are held and accessed only by Health Centre staff and staff under their supervision as well as House Mistresses, or otherwise in accordance with express consent
- pastoral or safeguarding files.

However, a certain amount of any PALS pupil's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education required. The School uses CPOMs, a secure software application which monitors child protection, behavioural issues, bullying, special educational needs and domestic issues

In accordance with Data Protection Law, some of the school's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the school's specific directions.

HOW LONG WE KEEP PERSONAL DATA

The school 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 ordinary pupil files is up to 25 years following departure from the school. However, 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 compliance@rmsforgirls.com. However, please bear in mind that the school 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").

YOUR RIGHTS

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the school, and in some cases ask for it to be erased or amended or have it transferred to others, or for the school to stop processing it – but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to compliance@rmsforgirls.com.

The school 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 one month in the case of requests for access to information. The school will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the school may ask you to reconsider, or require a proportionate fee, but only where Data Protection Law allows it.

- Requests that cannot be fulfilled

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals, or information which is subject to legal professional privilege.

The school is not required to disclose any pupil examination scripts, other information consisting solely of pupil test answers, provide examination or other test marks ahead of any ordinary publication.

We will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

- Pupil requests

Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the school, they have sufficient maturity to understand the request they are making. A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger pupils, the law still considers the information in question to be the child's: for older pupils, the parent making the request may need to evidence their child's authority for the specific request.

Pupils aged 13 and above are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home. All subject access requests will therefore be considered on a case by case basis.

- Parental requests.

It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about pupils without their consent. The school may consider there are lawful grounds for sharing with or without reference to that pupil.

You will in general receive educational and pastoral updates about your child, in accordance with the Parent Contract. Where parents are separated, the school will in most cases aim to provide the same information to each person with parental responsibility, but may need to factor in all the circumstances including the express wishes of the child.

All information requests from, on behalf of, or concerning pupils – whether made under subject access or simply as an incidental request – will therefore be considered on a case by case basis.

- Consent

Where the school is relying on consent as a means to process personal data, you may withdraw this consent at any time (subject to similar age considerations as above). Examples where we do rely on consent are: biometrics, certain types of uses of images and certain types of fundraising activity. Please be aware however that the school may not be relying on consent but have another lawful reason to process the personal data in question which will usually have been asserted under this Privacy Notice, or may otherwise exist under some form of contract or agreement with the individual (e.g. a parent contract, or because services or membership of an organisation such as an alumni or parents' association has been requested).

- Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates. However, the school will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils – for example, under the parent contract, or via a form. Parents and pupils should be aware that this is not necessarily the same as the school relying on strict consent (see section on Consent above).

Where consent is required, it may in some cases be necessary or appropriate – given the nature of the processing in question, and the pupil's age and understanding – to seek the pupil's consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

In general, the school will assume that pupils' consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare. That is unless, in the school's opinion, there is a good reason to do otherwise.

However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the school may be under an obligation to maintain confidentiality unless, in the school's opinion, there is a good reason to do otherwise; for example where the school believes disclosure will be in the best interests of the pupil or other pupils, or if required by law.

Pupils are required to respect the personal data and privacy of others, and to comply with the school's IT: Acceptable Use Policy and the School Rules.

DATA ACCURACY AND SECURITY

The school 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 the school by completing the relevant form on 'My School Portal' or by contacting datasupport@rmsforgirls.com 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 school may need to process your data, or who you may contact if you disagree.

The school 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 school systems. All staff and governors will be made aware of this notice and their duties under Data Protection Law and receive relevant training.

COVID-19 RELATED PROCESSING

While pandemic conditions persist, the school may need to collect, share and otherwise process personal data in accordance with Government guidance. This may be for reasons not specifically set out in this Privacy Notice but always for the purposes of protecting public and individual health by seeking to limit the spread of coronavirus (COVID-19).

THIS NOTICE

The school 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 notice should be directed to the Compliance Officer compliance@rmsforgirls.com.

For further detail about data protection, please refer to the Data Protection Policy

If an individual believes that the school has not complied with this notice or acted otherwise than in accordance with Data Protection Law, they should utilise the school complaints procedure and should also notify compliance@rmsforgirls.com. 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 school before involving the regulator.

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