



Ghyll Royd School and Pre-School  
A foundation for life

# Privacy Notice

Policy Leader: Mr David Martin

Policy review completed by the Headteacher on  
Name of Headteacher  
Date to be reviewed

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Summer 2021

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David Martin

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Summer 2022

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Company Number • 03583140 Registered Charity No • 107023

## **Under the UK General Data Protection Act (2018), Ghyll Royd School and Pre-School**

### **PROSPECTIVE FAMILIES & EVENT ATTENDEES**

We hold your contact details only in order to send you electronic and direct mail communications. Our mailing list holds no other data than your name, address, contact number and contact email. This is held on Ghyll Royd School's secure network database and in Mailchimp and we will ensure that these are held securely.

Mailchimp assert that "MailChimp has certified to the EU-U.S. Privacy Shield Framework and Swiss U.S. Privacy Shield Framework, so you can transfer your subscribers' personal data outside of the EU to MailChimp in the U.S."

We will not share your details with any other organisation unless compelled legally to do so.

We will only get in touch with you through the preferred communications you have agreed to and we will make sure that everything we send to you is relevant either to your interest or our marketing, events and news updates.

We will hold your information until such time as you request us to stop doing this, or for as long as your child is of age to attend Ghyll Royd School, Pre-School and Nursery.

Make sure you are in control of your information. You can ask to stop receiving communications from Ghyll Royd School, Pre-School and Nursery whenever you like. If you would like to unsubscribe from our mailing list please do so by emailing [information@ghyllroydschool.co.uk](mailto:information@ghyllroydschool.co.uk) stating your name and address.

If you would like to contact us to discuss this further, please contact Gilly Downs in the School Office: [information@ghyllroydschool.co.uk](mailto:information@ghyllroydschool.co.uk)

### **TYPES OF PERSONAL DATA WE PROCESS (including prospective, current and past pupils; their parents; staff; suppliers; friends and supporters)**

We process personal data about prospective, current and past pupils and their parents; staff, suppliers and contractors; donors, friends and supporters; and other individuals connected to or visiting the School.

The personal data we process takes different forms – it may be factual information, expressions of opinion, images or other recorded information which identifies or relates to a living individual. Examples include:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- family details;
- admissions, academic, disciplinary and other education related records, information about special educational needs, references, examination scripts and marks;
- education and employment data;

- images, audio and video recordings;
- financial information (eg for bursary assessment or for fundraising);
- courses, meetings or events attended.

As a school, we need to process special category personal data for pupils (eg concerning health, ethnicity, religion or biometric data) and criminal records information about staff or external visitors. We do so in accordance with applicable law (including with respect to safeguarding or employment) or by explicit consent.

## **COLLECTING, HANDLING AND SHARING PERSONAL DATA**

We collect most of the personal data we process directly from the individual concerned (or in the case of pupils, from their parents). In some cases, we collect data from third parties (for example, referees, previous schools, the Disclosure and Barring Service, or professionals or authorities working with the individual) or from publicly available resources.

Personal data held by us is processed by appropriate members of staff for the purposes for which the data was provided. We 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. We do not transfer personal data outside of the European Economic Area unless we are satisfied that the personal data will be afforded an equivalent level of protection.

Some of our systems are provided by third parties, eg hosted databases, school website, school calendar, . This is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions.

We share personal data about our alumni with the Old Boys Network. We do not otherwise share or sell personal data to other organisations for their own purposes.

## **PURPOSES FOR WHICH WE PROCESS PERSONAL DATA**

We process personal data to support the School's operation as an independent preparatory school for children aged 2-11 years old, and in particular for:

- The admission of pupils;
- The provision of education to pupils including the administration of the school curriculum and timetable; monitoring pupil progress and educational needs; reporting on the same internally and to parents; administration of pupils' entries to public examinations, reporting upon and publishing the results; providing references for pupils (including after a pupil has left);
- The provision of educational support and related services to pupils (and parents) including the maintenance of discipline; administration of sports fixtures and teams, school trips; provision of the school's IT and communications system all in accordance with our IT policies;
- The safeguarding of pupils' welfare and provision of pastoral care, welfare, health care services by school staff;
- Compliance with legislation and regulation including the preparation of information for inspections by the Independent Schools Inspectorate,

- submission of annual census information to each of the Independent Schools Council and Department for Education;
- Operational management including the compilation of pupil records; the administration of invoices, fees and accounts; the management of the School's property; the management of security and safety arrangements (including the monitoring of the school's IT and communications systems in accordance with our Acceptable Use Policy); management planning and forecasting; research and statistical analysis; the administration and implementation of the School's rules and policies for pupils and staff; the maintenance of historic archives and other operational purposes;
  - Staff administration including the recruitment of staff/ engagement of contractors (including compliance with DBS procedures); administration of payroll, pensions and sick leave; review and appraisal of staff performance; conduct of any grievance, capability or disciplinary procedures; and the maintenance of appropriate human resources records for current and former staff; and providing references;
  - The promotion of the School through its own websites, the prospectus and other publications and communications (including through our social media channels); and
  - Maintaining relationships with alumni and the wider school community by communicating with the body of current and former pupils and/or their parents or guardians and organising events.

The processing set out above is carried out to fulfil our legal obligations (including those under our parent contract and staff employment contracts). We also expect these purposes to form our legitimate interests.

## **HOW LONG WE KEEP PERSONAL DATA**

We retain personal data only for a legitimate and lawful reason and only for so long as necessary or required by law. We have adopted Records Retention Guidelines which set out the time period for which different categories of data are kept. If you have any specific queries about our record retention periods, or wish to request that your personal data is considered for erasure, please contact the school office: [information@ghyllroydschool.co.uk](mailto:information@ghyllroydschool.co.uk).

## **YOUR RIGHTS**

You have various rights under Data Protection Law to access and understand the personal data we hold about you, and in some cases to ask for it to be erased or amended or for us to stop processing it, but subject to certain exemptions and limitations.

You always have the right to withdraw consent, where given, or otherwise object to receiving generic or fundraising communications. Please be aware however that the school may have another lawful reason to process the personal data in question even without your consent. That reason will usually have been asserted under this Privacy Notice, or may exist under some form of contract or agreement with the individual (e.g.

an employment or parent contract, or because a purchase of goods, services or membership of one of our societies).

If you would like to access or amend your personal data, please make your request in writing to the school office.

We will 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. We will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, we may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows it.

You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal privilege. We are also not required to disclose any pupil examination scripts (though examiners' comments may fall to be disclosed), nor any confidential reference given by the school for the purposes of the education, training or employment of any individual.

## **PUPIL DATA**

The rights under Data Protection legislation belong to the individual to whom the data relates. However, we will often rely on parental consent to process personal data relating to pupils (if consent is required) unless, given the nature of the processing in question, and the pupil's age and understanding, it is more appropriate to rely on 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, we 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, 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, we may be under an obligation to maintain confidentiality unless, in our 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 is required by law.

## **CHANGE OF DETAILS**

We try to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Please notify [information@ghyllroydschool.co.uk](mailto:information@ghyllroydschool.co.uk) of any significant changes to important information, such as contact details, held about you.

## **THIS POLICY**

Our privacy notice should be read in conjunction with our other policies and terms and conditions which make reference to personal data, including our Parent Contract, our Safeguarding Policy, Health & Safety Policies, Acceptable Use Policies and IT Policies.

We will update this Privacy Notice from time to time. Any substantial changes that affect how we process your personal data will be notified on our website and to you directly, as far as practicable.

If you believe that we have not complied with this policy or have acted otherwise than in accordance with Data Protection Law, you should notify the Clerk & Legal Advisor to the Provost & Fellows. 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 us before involving them.