

Data Protection (Privacy) Notice

Who we are

The School of St Helen and St Katharine Trust ("the School") is a company limited by guarantee, registration number 01710695 and a charity with a registration number of 286892. For day-to-day communications, the School is referred to as St Helen and St Katharine.

For the purposes of this Privacy Notice, the School does not include the St Helen and St Katharine Foundation a separate charity, registered under number 1090084 or the St Helen and St Katharine Old Girls' Association Charitable Fund, both of which no longer operate, nor does it include the St Helen and St Katharine Parents' Association, which has separate charitable status.

The School is a Data Controller for the purposes of Data Protection Law.

WHAT THIS PRIVACY NOTICE IS FOR

This Privacy Notice is intended to provide information about how the School will collect, use and hold (or "process") personal data about individuals including: current, past and prospective students; and their parents, carers or guardians (referred to in this policy as "parents").

This makes the School a data controller of your personal information and this information is provided because data protection law gives individuals rights to understand how their data is processed. This Privacy Notice sets out how we will use that information and what your rights are in respect of the data we hold about you.

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:

- any contract between the School and the parents of students;
- the School's policy on taking, storing and using images of children;
- the School's CCTV policy;
- the School's Data Retention policy;
- the School's Safeguarding, Pastoral, or Health and Safety policies, including as to how concerns or incidents are recorded; and
- the School's IT policies, including its Acceptable Use Policies, Social Media policy, Online Safety policy, Remote Working policy and Bring Your Own Device policy.

RESPONSIBILITY FOR DATA PROTECTION

The School has appointed the Director of Finance and Operations as the Data Compliance Lead. The Health & Safety and Compliance Manager is the point of contact for requests and enquiries concerning the School's processing of your personal data and will endeavour to ensure that all

personal data is processed in compliance with this policy and data protection law. You can contact the School about data issues using data@shsk.org.uk.

WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to carry out our ordinary duties to staff, students and parents, the School needs to process a wide range of personal data about our community as part of our daily operations.

Some of this activity the School will need to carry out in order to fulfil our legal rights, duties or obligations – including those under a contract with our staff, or parents of our students.

Other uses of personal data will be made in accordance with the School's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data.

The School expects that the following uses will fall within that category of our (or our community's) "**legitimate interests**":

- For the purposes of student selection, to confirm the identity of prospective students and their parents, and retain a record (if appropriate) for the purposes of future applications or openings;
- To provide education services (including musical education, physical training or spiritual development, career services, and extra-curricular activities to students), and monitoring students' progress and educational needs, including where such services are provided remotely (either temporarily or permanently);
- To report to and liaise with parents about their child's progress, welfare and development including by way of regular reports and parents' evenings;
- To organise and manage meetings, events and social engagements for students and parents;
- To maintain relationships with alumni and the School community, including by direct marketing or fundraising activity;
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past and current students, including relating to outstanding fees or payment history, to/from any educational institution that the student attended or where it is proposed they attend; and to provide references to potential employers of past students;
- To enable students to take part in national or other assessments, and to publish the results of public examinations or other achievements of students at the School;
- To safeguard students' health and welfare and provide appropriate pastoral care (including following the requirements and recommendations of the government's guidance on [Keeping Children Safe in Education](#) (or "KCSIE");
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's Acceptable Use Policies;

- To make use of photographic images of students in School publications, on the School website and (where appropriate) on the School's social media channels in accordance with the School's policy on taking, storing and using images of children;
- For security purposes in accordance with the Schools CCTV policy;
- For the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities;
- To carry out or cooperate with any School or external complaints, disciplinary or investigation process;
- To promote the School to prospective parents and students; 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 (such as when carrying out DBS checks) in accordance with rights or duties imposed on us by law, including as regards safeguarding, or from time to time by explicit consent where required. These reasons will include:

- To safeguard students' 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 health / medical condition or other relevant information where it is in the individual's interests to do so: for example for emergency medical care, to arrange the assessment and diagnosis of a student's health and medical conditions and special educational needs, 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 comply with public health requirements;
- To provide educational services in the context of making reasonable adjustments for a student's disability and/or any special educational needs of a student;
- 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 SEND, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring, health and safety and immigration / visa sponsorship compliance) and to comply with its legal obligations and duties of care.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);
- bank details and other financial information, e.g. about parents (or others) who pay fees to the School, and any source of funds and/or anti-money laundering information we are required to collect by law;
- past, present and prospective students' academic, disciplinary, admissions, safeguarding and attendance records, and examination scripts and marks;
- nationality and other immigration status information (e.g. right to enter, live and work in the United Kingdom), including copies of passport information;

- information about students' health and medical conditions, special educational needs and family circumstances / living arrangements;
- contact details for next of kin;
- references given or received by the School about students, and relevant information provided by previous educational establishments and/or other professionals or organisations working with students;
- correspondence with and concerning students and parents (past and present); and
- images of students (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).

HOW THE SCHOOL COLLECTS DATA

Generally, the School receives personal data from the individual directly (including, in the case of students, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

However in some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities, or third-party service providers who credit and identity check parents and their source of funds); or collected from publicly available resources.

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

Processing by third parties. For the most part, personal data collected by the School will remain within the School 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 e.g. accounting, IT, cloud storage. 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 school's specific directions.

Data sharing. Occasionally, the School, including its governing board will need to share personal information relating to its community of students and parents with third parties, such as:

- appropriate contractors, such as visiting music teachers;
- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- examination boards;
- Stage 3 complaints panels, which may include independent panel members such as when a complaint is raised (and in accordance with the School Complaints Procedure, this requires the involvement of independent panel members);
- third parties and their advisers in the event of a possible or actual sale, merger or other restructuring of the school; and
- government authorities (e.g. HMRC, DfE, CAF/CASS, police, Home Office, a relevant public health / NHS body and / or local authority) and/or appropriate regulatory bodies e.g. the [Teaching Regulation Agency](#), the [Independent Schools Inspectorate](#).

ACCESS TO, AND SHARING OF, SENSITIVE DATA

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

- health and medical / special needs records; and

- pastoral or safeguarding files.

Medical / health data. The School needs to process such information to comply with statutory duties and to keep students and others safe, but the School will ensure only authorised staff can access information on a need-to-know basis. This may include wider dissemination if needed for School trips or for catering purposes. Express consent will be sought where appropriate. However, a certain amount of any relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the student requires.

Safeguarding data. The School is under duties imposed by law and statutory guidance (including [Keeping Children Safe in Education](#) or '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 notes on personnel or safeguarding files, low-level concerns records kept about adults (which may include references to students or family members), and in some cases referrals to relevant authorities such as the LADO, Children's Services, CAMHS or the police.

KCSIE also requires that, whenever a child leaves the School to join another school or college, her child protection file is promptly provided to the new organisation, along with any other information which the School's *Designated Safeguarding Lead* considers material to the ongoing care needs of any student. Where appropriate, the School will consult with parents as to how these needs are best served, but ultimately the decision as to what information is necessary to share with the new school or college is a safeguarding question that must be reserved to the School. The School will retain a copy of the child protection file in accordance with its retention policy for material related to safeguarding matters. For further information about this, please view the School's [Safeguarding Policies](#).

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 parent and student files is up to 7 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 the Health & Safety and Compliance Manager at data@shsk.org.uk. 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 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").

KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

The School will use the contact details of parents, alumni and other members of the school community to keep them updated about the activities of the School, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the School will also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the school community, such as the Parents Association.

- Contact parents and/or alumni by post and email in order to promote and raise funds for the school;

Should you wish to limit or object to any such use, or would like further information about them, please contact the School in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the School is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

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;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. The School will endeavour to respond to any such 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 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 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).

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.

Annex A:

Who has access to personal data and how the School uses it or who it is shared with

Reviewed:
Next Review:
Policy Responsibility:

Michaelmas 2023
Michaelmas 2024
DFO

Annex A

Who has access to personal data and how the School uses it or who it is shared with

Type of Data	Description	Examples of how we use it/share it (but not limited to)
Personal Details of parents ¹	Gender Name Family details Bank details Sensitive financial details Address Email Telephone number How we can contact you Past/present employment information CCTV images Employment	<ul style="list-style-type: none"> - Writing to you - School fee direct debits - Bursary applications - Insurance claim - Seeking your views on the services or activities we carry out, so that we can make improvements - Using the parent portal or other IT service we provide - If your daughter elects to participate in an overseas trip we will also need to share your address and phone number with the host school and host family. - We share your name and contact details with Abingdon School if your daughter is involved in any joint activity either at Abingdon School or a trip. - We may contact you and ask if you would be willing to assist with Sixth Form careers interviews or careers advice
Staff ² records	Job application information Information from third parties (DBS and references) Personal and emergency contact details Information concerning health and medical conditions Performance appraisal records Records of communications and interactions in course of employment/engagement Biographical, educational and social information Financial information	<ul style="list-style-type: none"> - Verification of job application details - To enable the employment or engagement of staff - Criminal records check for compliance with legal and regulatory obligations - Health and sickness records for monitoring in the interests of staff welfare and to make any reasonable adjustments to working environment - For pension scheme purposes - For payroll purposes - Producing car parking permits - Insurance claims - To provide necessary personal data to trip companies

¹ parents, carers or guardians (referred to in this notice as "parents")

² School personnel includes employed staff, self-employed persons, volunteers and governors

	Car details (about those who use our car parking facilities) CCTV images	
Personal data of third parties	Parents name Family details Address Email Telephone number How we can contact you Students Name Medical information (courses only) CCTV images	<ul style="list-style-type: none"> - Providing course joining information - Where lunch provided, ensure allergen requirements met - Insurance claim - Hiring of facilities e.g. badminton club, gymnastics club - Attending courses
Personal details of students and past students	Visual images Age Family details Medical data Provide educational services Religious data Passport details Academic record Attendance record Employment information Details about educational history and Entrance examination data CCTV images from school system or 3 rd party coach operator	<ul style="list-style-type: none"> - School publications, website, social media³ and to meet certain external examination requirements - Safeguard life - Provide food suitable for allergies - Special educational needs - Provide spiritual education in the context of any religious beliefs - Medical and family information to host families/ host schools - Medical and passport information to activity centres, airlines, ferry companies and other travel companies as appropriate - Provide references for employment and higher education - Examination scripts and marks - Student selection - Investigation of an incident - On occasion we may live stream an event or production and allow a recording to be made available for a finite time.
Technical	Monitor use of the School's IT and communications systems	<ul style="list-style-type: none"> - Monitor email traffic - Firewall provision

³ in accordance with the School's policy on Taking, Storing and Using Images of Students

	<p>Protection of personal and sensitive Personal data held on the School's IT system Physical security of the site Live streaming of visual images</p>	<ul style="list-style-type: none"> - CCTV images⁴ - Streaming school performances/activities etc - Use of planet E-stream
Documentary data & national identifiers	<p>Details stored in documents like: Passport Drivers licence Birth certificate National Insurance number</p>	<ul style="list-style-type: none"> - Prevent financial crime - Confirmation of identity - Donor and prospective donor due diligence
Consent and preferences	<p>Maintaining relationships with alumnae and the School community Direct marketing Fundraising activity</p>	<ul style="list-style-type: none"> - Parents, alumnae, parents booking courses at SHSK and other members of the School community will be updated about the activities of the School, or alumnae and parent events of interest - Share personal data with organisations set up to help establish and maintain relationships with the School community, such as the Parents' Association.
Operational planning & legal	<p>Management planning Forecasting Research Statistical analysis To fulfil legal obligations</p>	<ul style="list-style-type: none"> - Diversity or gender pay gap analysis - Taxation records
Regulatory	<p>To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate</p>	<ul style="list-style-type: none"> - Information to DfE - Information to ISI - Information to HMRC - Information to Companies House - Information to Charities Commission

⁴ in accordance with the School's CCTV policy

References	Give and receive information and references about past, current and prospective students	- Provide references to potential employers of past students
Provide education services ⁵	Examinations/moderation in certain subjects involve taking video recordings of the students Coursework Voice recordings Examination scripts Other recognised awards Arranging exchanges and pen-pals	- Enable students to take part in national or other assessments - Publish the results of public examinations or other achievements of students - Entry into an external competition (e.g. sporting, music etc) - Sending information to host families in the EU. Note that Spanish penpals may be in Chile (outside of the EU). We share your daughter's personal data if she is entered into an external competition, whose conditions of entry require it. - We share your daughter's data with Abingdon School if she is involved in any joint activity either at Abingdon School or a trip. - We share your daughter's data with our third-party work experience programme provider
Contractual	To fulfil contractual obligations	Your school invoices Financial details for bursary applications
Safeguarding	Medical Signs and disclosures of abuse Signs and disclosures of self-harm	Inform organisers of School trips (including Abingdon staff where appropriate) Inform external medical professionals Disclose information to Multi-Agency Safeguarding Hub and/or police safeguard students' welfare and provide appropriate pastoral care
Legal and regulatory	For legal and regulatory purposes and to comply with its legal obligations and duties of care.	Annual report to DfE (e.g. diversity monitoring) Annual report to ISI Child Protection Health & Safety HMRC Companies House Charity Commission

⁵ including musical education, physical training or spiritual development, career services, and extra-curricular activities to students, and monitoring students' progress and educational needs