



Blundell's

DATA PROTECTION POLICY

PUPILS and PARENTS

2017/2018

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Data Protection Policy: Pupils & Parents

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Data Protection Policy of Blundell's School ("the School")

1. About this Policy

- Your privacy is very important to us and we have taken steps to protect it. The School aims to be clear about the reasons for processing your personal data and to only handle it in ways you reasonably expect. This policy explains how the School use (or "process") personal data about pupils and their parents. In it, any reference to "pupils" includes current, past or prospective pupils and any reference to "parents" includes parents, carers or guardians.
- This policy should be read in conjunction with the School's terms and conditions and any other information we provide about how we process personal data.

2. General Statement of the School's Data Protection Obligations

- The "data controller" of the personal data we hold about you is Blundell's School (or "the School") and it is processed by us strictly in accordance with the Data Protection Act 1998 ("the DPA"). We have notified the Information Commissioner's Office of our processing arrangements and a copy of our entry on the register of data controllers can be viewed at www.ico.gov.uk under registration number Z535913X.
- The School has appointed the Bursar as Data Protection Officer ("DPO") who will endeavor to ensure that all personal data you provide to the School is processed in a way that complies with both this policy and the DPA itself. The DPO's contact details are in paragraph 14 below.

3. What Sort of Personal Data Does the School Process?

In order to carry out our functions, the School collects and uses a wide variety of personal data from various sources, including by obtaining information from pupils and parents. Personal Data means data that identifies or is capable of identifying a living individual and can include facts, opinions or intentions towards the individual. This is likely to include (but is not necessarily limited to) the following:

- name, address, date of birth, postal address, email address and telephone contact numbers;
- next of Kin details including their contact details;
- financial information such as bank details;
- references written or received by the School (such as educational references);

- information about pupils' admissions and attendance, education, achievements, examinations and assessments, disciplinary records and, where relevant, information about special needs such as reports and evaluations;
- photographs and, in some cases, video and audio data relating to pupils and occasionally others
- images captured by our CCTV system
- biometric information which will be processed by the School in accordance with both the DPA and the Protection of Freedoms Act 2012
- In some cases, the School will need to process "sensitive personal data". The DPA defines "Sensitive Personal Data" as information relating to an individual's physical or mental health or condition, racial or ethnic origin, political and religious beliefs (or similar), membership of certain trade unions, records of criminal convictions and details of certain criminal legal proceedings. Unless the DPA or other laws allow otherwise, the School will only process sensitive personal data with explicit consent of the appropriate individual.

4. What Do We Use Your Personal Data for?

The School processes personal data (including Sensitive Personal Data) for a wide variety of operational, statutory and other purposes. By way of example only the School may process personal data for the following purposes:

- to enable the School to meet its primary function of providing education services, careers services, extra-curricular activities, assessment and examination purposes and SEN services;
- to support teaching and learning, to monitor and report on pupils' progress and to assess how well the School is doing as a whole;
- to supply and receive pupil information and references;
- to supply and receive information relating to payment history including details of any fee arrears;
- to confirm the identity of prospective pupils and their parents and for the purposes of processing applications generally;
- to enable the School to plan for the future; for research and statistical analysis; for insurance purposes; to communicate with pupils and parents including alumni and others; to promote the School;
- to provide care including pastoral support and where necessary medical care;
- to comply with our legal and regulatory duties and obligations;

- where otherwise reasonably necessary for the School's purposes.

5. Who do we share Your Personal Data with?

We will not share your personal data (including sensitive personal data) with anyone outside the School without your consent unless the law requires or allows us to do so or as deemed necessary by the School for the exercise of our functions. Any sharing of personal data is carried out strictly in accordance with the DPA.

By way of example, the School may share your personal data with third parties in the following circumstances:

- to provide a confidential pupil reference to another educational establishment or employer;
- to provide information relating to payment history and, where relevant, outstanding fees, to another educational establishment that the pupil proposes to attend;
- to disclose details of the pupil's medical health or condition to others where it is in the best interests of the pupil or another person to do so such as a medical professional or insurance provider or for the organisation of a School trip;
- to publish pupil examination results or details of other pupil achievements;
- to monitor use of the School's communication and IT systems so as to ensure that they are being used in accordance with the School's rules;
- for School operational purposes such as to obtain insurance or professional advice, to obtain IT and support services from external providers and to organise School trips and extra-curricular activities;
- where the School is legally required or obligated to share information e.g. for child protection or health and safety purposes;
- to use photographs in School and other publications, including the School website and social media. The use of images in this way will be strictly in accordance with the School's policy on pupil images. (see paragraph 6 below);
- for fundraising, marketing or School promotional purposes and to maintain relationships with pupils. The use of personal data for these purposes will be strictly in accordance with the School's policy. (see paragraph 8 below)

6. Photographic and Video Images

The School may use photographs (in either digital or printed format) or video of pupils and parents in the following ways:

Processing Images for Essential School Purposes

- For the necessary purpose of holding a formal identity photograph of each pupil for administrative purposes
- For the necessary purpose of identifying those pupils with specific needs to staff e.g. pupils with allergies etc.

Processing Images for Further Purposes

Where appropriate consent * has been provided, the School may also

- Include photographs or video of pupils and parents in various School publications (in printed and electronic format) e.g. the School Prospectus, School magazines and leaflets, on the School's website and on various School social networking platforms e.g. Twitter, Facebook, Instagram etc. for the following purposes:
 - School promotional, marketing and fundraising purposes;
 - Communicating with the school community and to celebrate pupil achievements;
 - Keeping in touch with former pupils and their parents.
- Allow third party media (for example, visiting journalists) to use photographs or video for their own journalistic purposes.

Where an image or video is published for any of these further purposes, the image will only be published together with the pupil's first name providing you have consented. The image of the pupil will only be published together with the child's full name where the specific consent has been provided by the appropriate person and such consent will be sought on a case by case basis.

Giving Consent and Changing Your Preferences:

*We will invite your consent for the School to use images or video of pupils and parents when a pupil is admitted and also upon leaving. Apart from this you have the right to withdraw or amend your consent for the various further uses of images and video at any time by contacting the School's DPO using the contact details in Paragraph 14 below.

Any changes made to your preferences will take effect from the date we issue our written acknowledgement. Where consent is withdrawn, the School will cease using the image in future publications. However, it may not always be possible to remove images/video that have already been printed or published.

7. Use of Photographs and Video by Pupils, Parents and Others

Where parents and others attend School performances and sporting events etc. the School will generally permit reasonable photography [and recording] for personal domestic purposes only. However, the School does not permit the publishing of any photograph or recording of children other than your own. This includes publishing on video or photograph sharing websites (such as YouTube and Instagram etc.) and social networking platforms (such as Facebook and Twitter etc.)

The School's policy reflects our legal obligation to protect the privacy and in some cases personal safety of all of our pupils and recognises that not all pupils and parents wish or consent to their images and other personal data being published. This is our general policy and may be subject to variation on a case by case basis.

8. School Fundraising and Marketing, Keeping in Touch and Alumni Relations

Essential School Communications

The School will use your contact details to keep you informed about School activities and other School notices by post and email. You can update the way we communicate with you for these purposes at any time by contacting the School's DPO whose details can be found in Paragraph 14 below.

Further Communications

In addition, with your consent, the School may also use your details for the purposes set out below.

We may contact you via your preferred channel(s) of communication (email, SMS, phone, social networking platform or post) for these purposes. You have the right to tell us to stop using your information for these purposes at any time or to alter the channel of communication by contacting the School's Data Protection Officer: -The Bursar, Mrs Annika Heidrich-Wiggans at bursar@blundells.org.

- The School will share personal data of parents, alumni and other supporters with certain third party organisations which have been specifically set up to help with fundraising and to establish and maintain relationships with the School community such as The Old Blundellian Club and The Peter Blundell's Society. Where this happens, the School will only share the minimum information necessary and in a way that complies with the DPA.
- The School will contact you (including via the third party organisations mentioned above) to update you with details of our latest School fundraising activities, to promote and market the School generally and occasionally where appropriate, to raise funds for other causes which we think are worthy.

- In order to help with our School fundraising, on occasion the School may combine information you have provided to us with other information from external sources such as Companies House, the press, social media sites and third party organisations. Doing this helps us improve the quality and accuracy of the information we hold. We also use this information to gain a better understanding of our supporters such as their interests, occupation, activities and level of potential financial support.
- Where we engage an external organisation to help with this fundraising activity, we will also need to share some information about you with them e.g. Name and contact details. Where this happens, we only share the minimum personal data necessary for the purpose and always in a way that complies fully with the DPA.

9. How do We Protect and Handle Your Personal Data?

- The DPA requires the School to take appropriate technical and organisational security measures to protect personal data. All staff are made aware of their duties under the DPA and this policy.
- Apart from keeping your personal data secure we also take steps to ensure that it is kept accurate and, where necessary, kept up to date, is adequate, relevant and not excessive in relation to the purpose/s for which the data is being processed. In most cases, you have the right to request that any inaccurate information is erased or corrected and may do so by contacting the School DPO using the contact details below.
- We endeavor to ensure that information is not kept for longer than necessary and is deleted as soon as reasonably practicable. However, the School may retain some personal data so that we can comply with regulatory or legal obligations and for legitimate organisational reasons.

10. Your Right of Access to Personal Data

- Under the Act, individuals have the legal right to access their personal data held by the School and certain other information relating to how their data is processed. This is known as the right of subject access.
- The right of subject access applies subject to the application of legal restrictions. For example, you may not be able to access information which is capable of identifying other people or information which is subject to legal privilege (such as legal advice given to the School), confidential references given by the School and copies of examination scripts.
- Pupils are free to make their own Subject Access Request if they choose provided that we think they are sufficiently mature enough to understand the consequences of their request. Generally, pupils that are age 12 or over are considered to have achieved this level of maturity although this will depend upon the individual child, the context and the nature of the

personal data which they could potentially have access to. We will consider each pupil Subject Access Request on an individual basis.

- A pupil may ask a parent or other representative to make a Subject Access Request on their behalf. However, generally, we would expect a person with parental responsibility to make a subject access request on behalf of younger pupils. Where a parent or other adult makes a Subject Access Request on behalf of a pupil the School is required to consider if the request is in fact being made on behalf of the pupil and if disclosure is in the pupil's best interests. In some cases, where appropriate, we may need to discuss the request with the pupil themselves.
- Subject Access Requests should be made in writing to the School's DPO using the contact details below. In some cases, the School may ask for further information to confirm the identity of the requestor or for information to help locate the information requested. Requests will be processed as quickly as is reasonably practicable and within the statutory time limit of 40 calendar days. The School may charge a fee of £10 to process a Subject Access Request.

11. More About Your Rights under the Data Protection Act

- The DPA gives legal rights to the individual that is the subject of the personal data. In most cases, this will be the pupil. However, where the School needs consent in order to process a pupil's personal data then usually the School will rely upon parental consent.
- In some cases however it may not be reasonable or appropriate to rely upon parental consent in order for the School to process pupil personal data. E.g. given the nature of the processing and where the pupil has sufficient maturity and understanding or where other laws expressly permit the pupil to provide (or withhold) consent. In such cases, parents should be aware that they may not be consulted.
- Where a pupil is concerned about their privacy or expressly objects to their personal data being disclosed to a parent, the School will usually respect the pupil's wishes unless in the School's opinion it is appropriate and in the best interests of the pupil (or others) to do otherwise.

12. Transferring Your Information Overseas

Occasionally we may need to transfer personal data overseas including outside the European Economic Area for the purposes set out above. Where this happens, we will ensure that appropriate safeguards are put in place to protect your personal data.

13. Your Obligations

In order for the School to keep its records accurate and adequate we need to ensure that they are kept up to date. You are required to inform us of any changes to the personal data that we hold so that we can amend our records accordingly. For example, you are required to notify us immediately of any change of address or other contact details or any specific medical or health information.

Please notify changes to your personal data to the relevant member of staff as follows:

Contact details – School Office on 01884 252543/info@blundells.org

Medical/Health Information – School Nurse on 01884 232422/
sanatorium@blundells.org

Financial Details – Bursar on 01884 252232/bursar@blundells.org

14. Questions and Complaints

If you have any queries or complaints concerning your personal data or any questions about this policy please contact the School's DPO using the contact details below.

15. Contact the School Data Protection Officer

The School's DPO can be contacted using the methods below. In some cases, it may be appropriate or necessary to put your request in writing rather than by telephone.

By Post: Blundell's School, Blundells Road, Tiverton, Devon, EX16 4DT

By phone: 01884 252232

By email: bursar@blundells.org