St Paul's School
FOUNDED 1509

Privacy Notice for Pupils and Parents

Author/reviewer responsible:	Operations and Compliance Manager	Date of last review:	06/26
Reviewed by:	E-Safety Committee	Date of authorisation:	08/26
Authorised by resolution of:	Full Governing Body	Date of next review:	06/27
Applicable	Whole School		

This policy is available on the Handbook page of the School Intranet and policies page of the School website and can be made available in large print or other accessible format if required; such requests can be made to policyquery@stpaulsschool.org.uk

This privacy notice describes how we collect and use personal information about pupils, in accordance with the UK General Data Protection Regulation (UK GDPR), section 537A of the Education Act 1996 and section 83 of the Children Act 1989.

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The Data (Use and Access) Act 2025 further amends both the UK GDPR and Data Protection Act 2018 to modernise UK data protection rules and clarify certain rights and obligations. The GDPR as it continues to apply in the EU is known as EU GDPR.

This Privacy Notice applies to all pupils and parents, 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.

Who we are

St Paul's School is an independent day and boarding school for boys aged between 7 and 18. Boys up to the age of 13 are educated at St Paul's Prep School, which shares the same site. St Paul's School is a limited company with charitable status, governed by a board of Trustees. This Privacy Notice covers the data processing activities related to the running of the school. St Paul's School has notified the

Information Commissioner's Office of its processing activities. The school's ICO registration number is Z7315216 and its registered address is ST PAUL'S SCHOOL, LONSDALE ROAD, LONDON, SW13 9JT.

Who Collects This Information

St Paul's School is a "data controller" of personal data and gathers and uses certain information about pupils and parents. This means that we are responsible for deciding how we hold and use personal information about pupils and parents. Under data protection legislation, we are required to notify you of the information contained in this privacy notice.

St Paul's School is also a "joint data controller" alongside the St Paul's School Group schools in respect of certain processing activities involving personal data of pupils and parents from schools within the Group.

This notice does not form part of any contract to provide services and we may update this notice at any time.

It is important that you read this notice with any other policies mentioned within this privacy notice, so that you are aware of how and why we are processing your information, what your rights are under data protection legislation and the procedures we take to protect your personal data.

Data Protection Principles

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

Categories of Pupil and Parent Information We Collect, Process, Hold and Share

We may collect, store and use the following categories of personal information about you:

- Personal information such as name, pupil number, date of birth, gender and contact information;
- Emergency contact and family lifestyle information such as names, relationship, phone numbers, occupations, addresses and email addresses;
- Characteristics (such as language and free school meal eligibility);
- Attendance details (such as sessions attended, number of absences and reasons for absence);
- Performance and assessment information;
- Behavioural information (including exclusions);
- Special educational needs information;
- Relevant medical information;
- Images and recordings of pupils engaging in school and co-curricular activities (which may include live-streaming with appropriate safeguards and delay), and images captured by the School's CCTV system;
- Images and recordings of pupils and/or parents attending school and co-curricular events (which may include live-streaming with appropriate safeguards and delay);
- Information about the use of our IT, communications and other systems, and other monitoring information;
- bank details and other financial information, e.g. about parents and other relatives who pay fees to the school;
- Post 16 learning information;
- Recordings of pupils and/or parents from the school's video conferencing platform;
- 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;
- Car details (about those who use our car parking facilities) including images captured by CCTV and ANPR;
- Correspondence with and concerning pupils and parents;
- Donor due diligence including, but not limited to, background and interests, information about partners, financial and other data you have disclosed to us or which we have derived from public records and publicly-available sources of information or by using in-house or reputable third parties to profile donor's financial capability, and information about your areas of interest and potential to support the School.

We may also collect, store and use the following more sensitive types of personal information:

- Information about your race or ethnicity, religious or philosophical beliefs
- Information about your health, including any medical conditions and sickness records.
- Special educational needs information;

How we collect this Information

Generally, the school receives personal data from the individual directly (including, in the case of pupils, 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).

In some cases personal data will be supplied by third parties (for example another school, a Group school, or other professionals or authorities working with that individual); or collected from publicly available resources. In some cases other data is added including, but not limited to, information about partners, financial and other data disclosed to us or which we have derived from public records and publicly-available sources of information or by using in-house or reputable third parties to profile donors' financial capability (sometimes called wealth screening), and information about your areas of interest and potential to support the School.

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the UK General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or whether you have a choice in this.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

How and Why We Use Your Personal Information

We hold pupil and parent data and use it for:

- Pupil selection (and to confirm the identity of prospective pupils and their parents);
- Providing education services including musical education, physical training or spiritual development, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Informing decisions such as the funding of schools;
- Assessing performance and to set targets for schools;
- Safeguarding pupils' welfare and providing appropriate pastoral (and where necessary medical) care;
- taking 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;

- Supporting teaching and learning;
- Giving and receiving information and references about past, current and prospective pupils, and to provide references to potential employers of past pupils;
- Managing internal policy and procedure;
- Enabling pupils to take part in assessments, to publish the results of examinations and to record pupil achievements;
- To submit applications for exam access arrangements and reasonable adjustments;
- To carry out statistical analysis for diversity purposes;
- Legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care;
- Enabling relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate;
- Monitoring use of the school's IT and communications systems in accordance with the school's E Safety Policy;
- Making use of photographic images, recordings and live-streaming (with the appropriate safeguards and delay) of pupils in school publications, on the school website and on social media channels;
- Security purposes, including CCTV in accordance with the school's CCTV Policy;
- To provide support to pupils after they leave the school
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process;
- Maintaining relationships with alumni and the school community, including direct marketing or fundraising activity;
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests.
- 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); and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

The Lawful Bases on which we use this Information

We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Consent: the individual has given clear consent to process their personal data for a specific purpose;
- Contract: the processing is necessary for a contract with the individual;
- Legal obligation: the processing is necessary to comply with the law (not including contractual obligations);
- Legitimate Interest: the processing has a clear purpose, is necessary to the school and doesn't override the rights of individuals;
- Vital interests: the processing is necessary to protect someone's life.
- Public task: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law; and

- The Education Act 1996: for Departmental Censuses 3 times a year. More information can be found at: https://www.gov.uk/education/data-collection-and-censuses-for-schools.

We need all the categories of information in the list above primarily to allow us to comply with legal obligations. Please note that we may process information without knowledge or consent, where this is required or permitted by law.

How we use particularly sensitive personal information

Special categories of particularly sensitive personal information, such as information about your health, racial or ethnic origin, sexual orientation, or biometrics require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations in line with our data protection policy;
- For reasons of substantial public interest, such as for equal opportunities monitoring;
- Where necessary to establish, exercise or defend legal claims;
- Where necessary to protect your vital interests (or those of another person) and you are unable to consent.

Sharing Data

We may need to share your data with third parties where it is necessary. There are strict controls on who can see your information. We will not share your data if you have advised us that you do not want it shared unless we have compelling reasons to continue sharing it which override your rights and interests, it's the only way we can make sure you stay safe and healthy or we are legally required to do so.

We share pupil information with:

- The Department for Education (DfE) - on a statutory basis under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013;
- Appropriate regulatory bodies, such as the Teaching Regulation Agency, Independent Schools Inspectorate, the Charity Commission or the Information Commissioner);
- Exam boards (including evidence for exam concessions);
- Other Schools that pupils have attended/will attend;
- Other schools within The St Paul's School Group;
- NHS;
- Welfare services (such as social services);
- Law enforcement officials such as police, HMRC;
- Local Authority Designated Officer;
- Professional advisors such as lawyers, accountants, consultants and data enrichment companies;
- Support services (including insurance, IT support, information security);
- Providers of learning and management information software such as Microsoft Teams for Education, and iSAMS;
- Cloud storage providers;
- The Local Authority;
- The school's alumni association, the Old Pauline Club.

We may transfer your personal information outside the UK and the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

The Department for Education request regular data sharing on pupil attendance to help support those vulnerable students and to assist with intervention strategies. Further information on how the Department for Education collects this data may be found in our Attendance Policy.

Information will be provided to those agencies securely or anonymised where possible. The recipient of the information will be bound by confidentiality obligations; we require them to respect the security of your data and to treat it in accordance with the law.

Automated Decision Making

Automated decision making takes place when an electronic system uses personal information to make a decision without human intervention. We are required to ensure that appropriate safeguards are in place when using automated decision making for significant decisions and the circumstances in which we are permitted to use special category data (sensitive information) in automated decision making are limited.

You will not be subject to automated decision making for significant decisions unless we have a lawful basis, and a valid condition where required, for doing so and appropriate safeguards are in place. Appropriate safeguards include informing the relevant individuals about the automated decision making and their rights to request a human review, express their views, and contest the decision.

Retention Periods

Except as otherwise permitted or required by applicable law or regulation, the School only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve ongoing or anticipated disputes.

Information about how we retain information can be found in our Data Retention policy.

A limited and reasonable amount of information will be kept for archiving purposes.

Please note that, 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").

Security

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

Further details are available in our Data Breach Policy.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your, or your child's, personal information changes whilst you / your child attends our School.

Your Rights of Access, Correction, Erasure and Restriction

Under certain circumstances, by law you have the right to:

- Access your personal information (commonly known as a "subject access request"). This allows you to receive a copy of the personal information we hold about you and to check we are lawfully processing it. You will not have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.
- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it.
- Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
- To object to processing in certain circumstances (for example for direct marketing purposes).
- To transfer your personal information to another party.

If you want to request information, please see our Data Protection Policy , for the procedures we adopt.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

Right to Withdraw Consent

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact The Operations and Compliance Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Contact

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with The Operations and Compliance Manager in the first instance. We will acknowledge receipt of your complaint within 30 calendar days, and we will investigate and respond without undue delay. Further information about the way we handle data protection complaints can be found in our Data Protection Policy.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by The Operations and Compliance Manager, then you can contact the DPO on the details below: Data Protection Officer: Judicium Consulting Limited

Address: 5th Floor, 98 Theobalds Road, London, WC1X 8WB
Email: dataservices@judicium.com
Web: www.judiciumeducation.co.uk

Should you remain dissatisfied with the response, you have the right to make a complaint to the Information Commissioner's Office, the UK supervisory authority for data protection issues at https://ico.org.uk/concerns.

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.