



St Paul's School  
FOUNDED 1509

# Privacy Notice for Pupils and Parents

Author/reviewer responsible:	Operations and Compliance Manager	Date of last review:	11/24
Reviewed by:	ICT committee, Core Strategy Group	Date of authorisation:	12/24
Authorised by resolution of:	Full Governing Body	Date of next review:	06/25
Applicable	SPJ & SPS		

**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](mailto: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 GDPR as it continues to apply in the EU is known as EU GDPR.

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.

## 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 Juniors, 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." This means that we are responsible for deciding how we hold and use personal information about pupils and parents.

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

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

- 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 ethnicity, language, nationality, country of birth 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;
- Special categories of personal data (including biometric data, ethnicity, relevant medical information, special educational needs information);
- Images and recordings of pupils engaging in school activities, and images captured by the School's CCTV system;
- 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.

### **Collecting 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, 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 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 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 of pupils in school publications, on the school website and on social media channels;
- Making available recordings of school productions to parents;
- Security purposes, including CCTV in accordance with the school's [CCTV Policy](#); and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.
- 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);
- 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.

### **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 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);
- Other Schools that pupils have attended/will attend;
- 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 Google Classroom 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.

We do not share information about our pupils with anyone without consent unless otherwise required by law.

### **Storing Pupil Data**

The School keeps information about pupils on computer systems and sometimes on paper.

Except as required by law, the School only retains information about pupils for as long as necessary in accordance with timeframes imposed by law and our internal policy.

A limited and reasonable amount of information will be kept for archiving purposes, for example. 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").

### **Automated Decision Making**

Automated decision making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision making in limited circumstances.

Pupils will not be subject to automated decision-making, unless we have a lawful basis for doing so and we have notified you.

### **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 disputes.

Information about how we retain information can be found in our [Data Retention policy](#).

### **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).

## **Requesting Access to your Personal Data**

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, contact [DPO@stpaulsschool.org.uk](mailto:DPO@stpaulsschool.org.uk).

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). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

If you want to request information, please see our [Data Protection Policy](#) , for the procedures we adopt.

## **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 [DPO@stpaulsschool.org.uk](mailto:DPO@stpaulsschool.org.uk). 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 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: 72 Cannon Street, London, EC4N 6AE

Email: [dataservices@judicium.com](mailto:dataservices@judicium.com)

Web: [www.judiciumeducation.co.uk](http://www.judiciumeducation.co.uk)

Lead Contact: Craig Stilwell

You have the right to make a complaint at any time 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.

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