



**THE ELMS**

EST 1614

### **THE ELMS SCHOOL PRIVACY NOTICE**

The Elms School (“we”) promise to respect any personal information you share with us, or that we receive from other organisations and keep it safe. We aim to be clear about what data we collect, where, when and – most importantly – what we do with your data and why. Developing a better understanding of members of The Elms community through their personal data allows us to make better decisions about the events and communications we offer, to fundraise more efficiently and, ultimately, to help us to increase opportunity for bright deserving pupils of the school. Our marketing communications include news about our School and the achievements of The Elms students and alumnae, as well as event and alumnae reunion invitations and, occasionally, fundraising campaigns. We are currently consulting members of The Elms community to ensure that the way we use your data, and how we communicate with you, is in line with what you, as a member of our community, would reasonably expect. In the meantime, we will continue to communicate with you as we have done in the past. If, at any time, you would like to change the method by which we communicate with you, or to cease hearing from us call 01684 540344 or [office@elmsschool.co.uk](mailto:office@elmsschool.co.uk) to be removed from our mailing list.

#### **What This Privacy Notice Sets out to achieve**

This policy is intended to provide information about how the school will use (or "process") personal data about individuals including: its staff; its current, past and prospective pupils; and their parents, carers or guardians (referred to in this policy as "parents"). This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff, parents and pupils are all encouraged to read this Privacy Notice and understand the school's obligations to its entire community. 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 its staff or the parents of pupils;

- the school's policy on taking, storing and using images of children;
- the school's CCTV
- the school's retention of records 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 policy
- Anyone who works for, or acts on behalf of, the school (including staff, volunteers, governors and service providers) should also be aware of and comply with this Privacy Notice.

### **What personal information we collect about you**

The types of information we might collect includes names, contact details, interests, views of the School, whether you are a parent or an alumna, your attendance at events and your successes and achievements as a pupil. We may also collect professional details about your career and how and with whom you are happy to share your expertise, as recorded through our higher education and careers programme. In addition we might collect the following;

- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- personnel files, including in connection with academics, employment or safeguarding;
- where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- 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;
- correspondence with and concerning staff, pupils and parents past and present; and
- images of pupils (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);

### **Where and how we collect information about you**

In order to carry out its ordinary duties to staff, pupils and parents, the school needs to process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of its daily operation.

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

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 its "**legitimate interests**":

- For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents);
- To provide 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;
- 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;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law
- 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, current and prospective pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils;
- To enable pupils to take part in national or other assessments, or other achievements of pupils of the school;
- To safeguard pupils' welfare and provide appropriate pastoral care;
- To monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's IT: acceptable use policy;
- To make use of photographic images of pupils 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, including CCTV.
- To carry out or co-operate with any school or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

### **What we do with your personal information**

We may use your information to provide you with information about The Elms School, to supply merchandise and services you may request and to ensure we know how you wish to be contacted. We may also use your information to comply with legal and financial regulations, to understand how we can improve our communications, events and services and to further our charitable aims. This includes informing you about our philanthropic ambitions and activities for widening access through The Elms School Bursary programme and, occasionally, asking you to consider supporting us with a donation. We may also contact you to enquire whether you are willing to share your professional expertise with pupils and / or alumnae as part of our educational and social objectives. In protecting your personal information we take appropriate measures to ensure that the information disclosed to us is kept secure, accurate and up to date. For example, if a peer from your year at School requests your contact information we would always ask you if you are happy for us to disclose it prior to doing so.

### **Your consent**

By providing us with your personal data, you consent to the collection and use of any information you provide or we collect in accordance with the above purposes and this privacy statement. You have the right to withdraw consent for use of your data for any of these purposes at your discretion.

## **Right of access**

You have the right to ask for a copy of the information we hold about you and have any inaccuracies in your information updated.

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the school, and in some cases ask for it to be erased or amended or have it transferred to others, or for the school to stop processing it – but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the Office.

The school will endeavour to 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). You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals, or information which is subject to legal privilege (for example legal advice given to or sought by the school, or documents prepared in connection with a legal action).

The school is also not required to disclose any pupil examination scripts (or other information consisting solely of pupil test answers), provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the school itself for the purposes of the education, training or employment of any individual. You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the school, they have sufficient maturity to understand the request they are making. A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

## **Changes**

Please help us to keep your information and communication preferences up to date by notifying us at [office@elmsschool.co.uk](mailto:office@elmsschool.co.uk) or 01684 540344.

## **Further information about how we may share some of your personal information**

### **Checking your address**

We know from the returned mail we receive that people sometimes move house and forget to tell us. Where there appears to be a change, we will try and contact you to check the information. We will never change your details without making contact with you. If we are unable to verify your details with you, we may decide to cease postal communications until we make contact. Our aim is always to be in touch with those who wish to hear from us.

**This Policy**

The school will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

Reviewed by: Bursar

Date of last review: February 2018

Date of next review: February 2018