



Ruthin School

PRIVACY POLICY	
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How We Use Your Information

Privacy Notice for Parents (Key Information)

This Privacy Notice covers the following group of related companies and organisations.

Ruthin School

Ruthin School
Privacy Notice for Parents

Parent Privacy Notice - Key Information

This notice contains the key information about how and why we collect your personal information and what we do with that information. Personal information is information that identifies you and relates to you. For example, information about your family circumstances, your financial information and photographs of you.

You can also obtain a copy of the full privacy notice by contacting the School at:

The Bursar

Ruthin School

Mold Road

Ruthin

LL15 1EE

01824 702543

The full version includes additional points, such as, the rights you have to access your personal information including what decisions you can make about it, how long the School retains it and our legal bases for using it.

The School's primary reason for using your personal information is to provide educational services to your child, and to alert you to our services.

We set out below examples of the different ways in which we use your personal information and where that personal information comes from.

- We obtain information about you from various admissions forms and from your child's previous school. We may also obtain information from professionals such as doctors and from local authorities about your child.
- We may have information about any family circumstances which might affect your child's welfare or happiness.
- We will process financial information about you in relation to the payment of fees. In some cases, we get information about you from third parties such as credit reference agencies or from your child's previous school(s).
- We may take photographs or videos of you at School events to use on social media and on the School website. This is to show prospective parents and pupils what we do here and to advertise the School. We may continue to use these photographs and videos after your child has left the School.

- We will send you information to keep you up to date with what is happening at the School. For example, by sending you information about events and activities taking place (including fundraising events) and the School newsletter.
- We will keep details of your address when your child leaves the School, in order to keep up to date with your child's progress.

In some situations, we may need to share your information with third parties. For example:

- In fulfilling our legal obligations, on formal request, we will share information with local authorities, the Independent Schools Inspectorate / Estyn, and the Department for Education, for example, where we have any safeguarding concerns.
- If you have unpaid fees while your child is at the School, we may share information about this with other schools or educational establishments to which you intend to send your child.
- On occasion, we may need to share information with the police, our legal advisors, and our insurers.

The Bursar is the person responsible at our school for managing how we look after personal information and can answer any questions which you may have about how we use your personal information. Please contact via:

The Bursar
Ruthin School
Mold Road
Ruthin
LL15 1EE
01824 702543

How We Use Your Information

Privacy Notice for Parents

This Privacy Notice covers the following group of related companies and organisations.

Ruthin School

Parent Privacy Notice

Introduction

This notice is to help you understand **how** and **why** we collect personal information about you, your children, and **what** we do with that information. It also explains the decisions that you can make about your own information.

If you have any questions about this notice, please contact The Bursar.

What is "personal information"?

Personal information is information that identifies you and your children at the School, as an individual, and relates to you.

This includes your contact details, next of kin and financial information. We will also hold information provided to the School, from whatever source, as part of the admission process.

Our legal bases for using your information

This section contains information about the legal bases that we are relying on when handling your information.

The two tables below contain a general description of the different legal bases.

Legitimate interests ("LI")

This means that the School is using your information when this is necessary for the School's legitimate interests except when your interests and fundamental rights override our legitimate interests.

Specifically, the School has a legitimate interest in:

- providing educational services to your child and to other children;
- safeguarding and promoting the welfare of your child, other children and our employees;

- promoting the objects and interests of the School. This includes fundraising and using photographs of you at our school events in promotional material. It also includes making sure that we are able to enforce our rights against you, for example, so that we can contact you if unpaid school fees are due;
- keeping the school buildings safe;
- using your information in connection with legal disputes. For example, if you or your child bring a claim against the School;
- protecting the School's reputation;
- facilitating the efficient operation of the School; and
- ensuring that all relevant legal obligations of the School are complied with (for example in relation to inspections).

In addition, your personal information may be processed for the legitimate interests of others. For example, another school will have a legitimate interest in knowing if you have not paid School fees that are due to us.

Necessary for contract ("CT")

We will need to use your information to perform our obligations under our contract with you and for you to perform your obligations as well. For example, we need your, and guardian where applicable, name and contact details so that we can update you on your child's progress and so that we can contact you if there is a concern.

Legal obligation ("LO")

Where the School needs to use your information to comply with a legal obligation, for example to report a concern to Children's Services. We may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

Vital interests ("VI")

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

Performance of a task carried out in the public interest (or carrying out public tasks) ("PI")

The following are examples of when we use your information to perform tasks in the public interest:

- providing your child with an education;
- safeguarding and promoting your welfare, your child's welfare and the welfare of other children;
- facilitating the efficient operation of the School; and
- ensuring that we comply with all of our legal obligations.

The School must also comply with an additional condition where it processes special categories of personal information. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information.

Substantial public interest ("SPI")

The School is also allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This is like "public interest" in the table above.

Social protection and social security laws

The School may use your information to comply with social protection law (e.g. to look after your child) and social security laws. Social protection law is concerned with preventing, managing, and overcoming situations that adversely affect people's wellbeing.

Vital interests ("VI")

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

Legal claims ("LC")

We are allowed to use your information if this is necessary in relation to legal claims. For example, this allows us to share information with our legal advisors and insurers.

We set out below examples of the different ways in which we use personal information and where this personal information comes from. The letters highlighted in different colours below refer to the legal bases we are relying on. Please see the section above for an explanation.

1. The School's primary reason for using your personal information is to provide educational services to your child - LI, CT, PI, SPI.
2. We will have information about any family circumstances which might affect your child's welfare or happiness. This is to help us provide appropriate care and support to your child - LI, CT, PI, SPI.
3. We will need information about any court orders or criminal petitions which relate to you. This is so that we can safeguard the welfare and wellbeing of your child and the other pupils at the School - LI, CT, PI, SPI.
4. We may use CCTV to make sure the school site is safe. Images captured of you via CCTV will be your personal data. CCTV is not used in private areas such as toilets, changing rooms or boarding accommodation - LI, CT, PI, SPI.
5. If there is a complaint or grievance made to the School which involves you then we will use your information in connection with that complaint or grievance - LI, PI, SPI.
6. Where appropriate, the School will have information about your religious beliefs and practices. For example, if you do not eat certain foods - LI, SPI.
7. We may take photographs or videos of you at School events to use on social media and on the School website. This is to show prospective parents and pupils what we do and to advertise the School. We may continue to use these photographs and videos after your child has left the School - LI.
8. We will send you information to keep you up to date with what is happening at the School. For example, by sending you information about events and activities taking place (including fundraising events), course outside of term time and the School newsletter - LI.
9. We will keep details of your address when your child leaves the School, so we can keep up to date with your child's progress.
10. We may use your information when ensuring network and information security, for example, our anti-virus software might scan files containing information about you - LI.
11. We can keep information about you indefinitely if we need this for historical, research or statistical purposes – LI.

Financial information

12. We will process financial information about you in relation to the payment of fees. In some cases, we get information about you from third parties such as credit reference agencies or from your child's previous school(s) - LI, CT.
13. We will hold information about bankruptcy petitions and statutory demands, where relevant- LI, CT.
14. We may search the files of any licensed credit reference agency in order to verify your identity. This also allows us to assess your application for the award of a bursary or for credit

in contemplation of an agreement for the deferment of fees. The credit reference agency will keep a record of that search and details about your application. This record will be seen by other organisations which make searches about you - LI, CT.

15. We may share your information with debt recovery suppliers if you do not pay any school fees owed to the School - LI, CT.

Failure to supply information may result in a refusal of an award or credit.

Sharing personal information with third parties

16. In accordance with our legal obligations, we will share information with local authorities, the Welsh Government and Estyn for example, where we have any safeguarding concerns or to comply with our legal obligations - LI, LO, PI, SPI.

17. On occasion, we may need to share your information with the police for the prevention and investigation of crime and the prosecution of offenders. We will only do this in specific circumstances to assist the police with their investigations - LI, CT, LO, PI, SPI.

18. We may need to share information about you with the Welsh Government if there is a health and safety issue at the School - LI, LO, PI, SPI.

19. In certain circumstances, we may also need to share information with our legal advisers for the purpose of obtaining legal advice - LI, LO, PI, SPI, LC.

20. Occasionally we may use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly (e.g. our accountants). We will only share your information with them if this is relevant to their work - LI, CT, PI, SPI.

21. If your child is not of British nationality, we have to make sure that your child has the right to study in the UK. Sometimes the government will ask us to provide information as part of our reporting requirements. In addition to this we have a duty to provide information about you to UK Visas and Immigration to comply with our duties as a Tier 4 sponsor - LI, CT, LO, PI, SPI.

22. The School is a charity which means that in exceptional circumstances we may need to share your information with the Charity Commission e.g. in the event of a serious incident - LI, LO, PI, SPI.

23. We may share information about you with our insurance company, for example, where there is a serious incident at the School - LI, SPI, LC.

24. If you have unpaid fees while your child is at the School, we may share information about this with other schools or educational establishments to which you intend to send your child - LI.

25. If your child leaves us to attend another school, we may provide that school with information about you. For example, details of family circumstances if there have been any safeguarding incidents - LI, LO.

26. We may share information about you with others in your family, such as another parent or step-parent. For example, where this is part of our obligation to take care of your child, as

part of our wider legal and regulatory obligations, or in connection with school fees - LI, PI, SPI.

27. We may need to share information if there is an emergency, for example, if you are hurt whilst on School premises - LI, VI.

We sometimes use contractors to handle personal information on our behalf. The following are examples:

IT consultants who might access information about you when checking the security of our IT network; and

we use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the School site.

We obtain information about you from admissions forms and from your child's previous school. We may also obtain information from other professionals.

Criminal offence information

We may only use information relating to criminal convictions and offences where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations or to exercise our rights.

Less commonly, we may use information relating to criminal convictions and offences where it is necessary in relation to legal claims, where it is necessary to protect our pupils and you are not capable of giving your consent, or where you have already made the information public.

More than one basis

As you will see from this Notice, in some cases we rely on more than one basis for a particular use of your information. For example, we will rely on contract, legitimate interests and public interest bases when using your information to provide your child with an education.

The basis that we will rely on for a particular purpose may vary depending on the circumstances. For example, if we decide to tell the local authority something about a parent for safeguarding reasons, sometimes this will be because we have a legal obligation to do so but on other occasions we may tell the local authority because we are worried about the child even if we don't have a legal obligation to report something (in which case we would be relying on legitimate interests and public interests).

Consent

We may ask for your specific consent to use your information in certain ways as an alternative to relying on any of the bases in the table above. For example, we may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on legitimate interests. If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. Please speak to The Bursar, if you would like to withdraw any consent given.

Sending information to other countries

In certain circumstances, we may send your information to countries which do not have the same level of protection for personal information as there is in the UK. For example, we may:

- store your information on cloud computer storage based overseas.

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: https://ec.europa.eu/info/law/law-topic/data-protection/datatransfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en

If the country that we are sending your information to is not on the list or is not a country within the EEA (which means the European Union, Liechtenstein, Norway, Switzerland, and Iceland), then it might not have the same level of protection for personal information as there is in the UK.

We will provide you with details about the safeguards which we have in place outside of this privacy notice. If you have any questions about the safeguards that are in place, please contact The Bursar.

For how long do we keep your information?

We keep your information for as long as we need to in order to educate and look after your child. We will keep some information after your child has left the School, for example, so that we can find out what happened if you make a complaint.

In exceptional circumstances we may keep your information for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

What decisions can you make about your information?

From 25 May 2018 data protection legislation gives you a number of rights regarding your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

- **Rectification:** if information is incorrect you can ask us to correct it.
- **Access:** you can also ask what information we hold about you and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to.
- **Deletion:** you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your information to you or to a third party in a format that can be read by computer. This applies where (a) the information has been provided by you; (b) the basis that we are relying on to process your information is consent or contract (please see "Our legal bases for using your information below"); and (c) the information is being processed by us on computer.
- **Restriction:** our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate, we can only use it for limited purposes while we check its accuracy.
- **Object:** you may object to us using your information where:
 - a. we are using it for direct marketing purposes (e.g. to send you the School magazine);
 - b. the legal basis on which we are relying is either legitimate interests or performance of a task carried out in the public interest.
 - c. we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of you at a School event for historical reasons.

The Bursar can give you more information about your data protection rights.

The Bursar

Ruthin School

Mold Road

Ruthin

LL15 1EE

01824 702543

Further information and guidance

The Bursar is the person responsible at our school for managing how we look after personal information and deciding how it is shared.

Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.

This notice is to explain how we use your personal information. The Bursar can answer any questions which you may have.

This privacy notice does not, and is not intended to, give you any rights which you did not already have. For example, it does not give you any additional contractual rights.

Please speak to The Bursar:

- you object to us using your information for marketing purposes e.g. to send you information about school events. We will stop using your information for marketing purposes if you tell us not to; or
- you would like us to update the information we hold about you; or
- you would prefer that certain information is kept confidential.

If you fail to provide certain information when requested, we may not be able to perform our obligations under the contract we have entered into with you. We may also be prevented from complying with our legal obligations (such as to ensure the welfare of your child and their classmates).

If you consider that we have not acted properly when using your personal information, you can contact the Information Commissioner's Office - ico.org.uk.

How We Use Your Information

Privacy Notice for Older Pupils (Key Information)

Ruthin School

Pupil Privacy Notice - Key Information

This notice contains the key information about **how** and **why** we collect your personal information and **what** we do with that information.

Personal information is information that identifies you and relates to you. For example, information about how well you are doing at School and any information that we need to take care of you. Photographs and videos of you also count as your personal information.

You can also obtain a copy of the full privacy notice by asking your parents to contact the School or by speaking to your Housemaster / Housemistress / Tutor.

The full version includes additional points, such as:

- the rights you have in your information including what decisions you can make about your information;
- for how long the School retains your personal information; and
- our legal bases for using your personal information.

Our primary reason for using your personal information is to provide you with an education.

We set out below examples of the different ways in which we use your personal information and where that personal information comes from.

- Admissions forms give us lots of personal information. We get information from you, your parents, your teachers and other pupils. Your old school also gives us information about you so that we can teach and care for you.
- Sometimes we get information from your doctors and other professionals where we need this to look after you.
- We may need to report some of your information to the government (e.g. the Department for Education). We will need to tell the local authority that you attend the School, if you leave the School or let them know if we have any concerns about your welfare.
- We will share your academic and (where fair) your behaviour records with your parents or education guardian so they can support your schooling.
- We may use photographs or videos of you for the School's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the School. We may continue to use these photographs and videos after you have left the School. Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.
- We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing.
- We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms.
- We will send you information to keep you up to date with what is happening at the School. For example, by sending you information about future events and activities taking place (including fundraising events) and the School newsletter.

- We will keep details of your address when you leave in order to keep up to date with your progress. We may also pass your details onto the alumni organisation which is called the Old Ruthinian Association.

If you have any questions about how we use your personal information, please speak to your Housemaster / Housemistress / Tutor. Alternatively, you can speak to your parents who will talk to us on your behalf.

How We Use Your Information

Privacy Notice for Older Pupils

This Privacy Notice covers the following group of related companies and organisations.

Ruthin School

Introduction

This notice is to help you understand **how** and **why** we collect your personal information and **what** we do with that information. It also explains the decisions that you can make about your own information.

If you have any questions about this notice, please talk to your Housemaster / Housemistress.

What is "personal information"?

Personal information is information that the School holds about you and which identifies you.

This includes information such as your name, date of birth and address as well as things like exam results, medical details, unique pupil number and behaviour records. We will also hold information such as your religion or ethnic group for the purposes of the administration of your wellbeing. CCTV, photos and video recordings of you are also personal information.

Our legal bases for using your information

This section contains information about the legal bases that we are relying on when handling your information as described above.

The two tables below contain a general description of the different legal bases.

Legitimate interests ("LI")

This means that the School is using your information when this is necessary for the School's legitimate interests or someone else's legitimate interests. We won't rely on this basis when your interests and fundamental rights override our legitimate interests. Specifically, the School has a legitimate interest in:

- Providing you with an education and making sure that you are behaving properly.

- Complying with our agreement with your parents for you to be at the School.
- Looking after you, your classmates and our staff (e.g. your teachers).
- Keeping the school buildings safe.
- Making sure that the School is well managed and that we protect the School's reputation.
- Telling people about the School and what we do here e.g. we may use photographs of you in our prospectus, on our website or in our social media.
- Ensuring that all relevant legal obligations of the School are complied with (for example in relation to inspections).
- Using your information in connection with legal disputes.
- Improving the School e.g. if we want to raise money to build new buildings or to make sure that we are providing you and your classmates with a good schooling experience.

In addition, your personal information may be processed for the legitimate interests of others. For example, we may use information about you when investigating a complaint made by one of your fellow pupils.

Legal obligation ("LO")

The School might need to use your information in order to comply with a legal obligation, for example, to report a concern about your wellbeing to external children's services and agencies. We will also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

Vital interests

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

Performance of a task carried out in the public interest (or carrying out public tasks) ("PI")

This applies where what we are doing is for the benefit of people generally. The following are examples of where this applies:

- providing you and others with an education;
- safeguarding and promoting your welfare and the welfare of your classmates;
- facilitating the efficient operation of the School; and
- ensuring that we comply with all of our legal obligations.

The School must also comply with an additional condition where it processes special categories of personal information. These special categories include: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric

information, health information, and information about sexual orientation.

Substantial public interest ("SPI")

The School is allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This is similar to "public interest" in the table above. For example, the School will use information about your health to look after you. We may also use other types of special category personal data about you to provide you with an education, to look after you and your classmates or when the School is inspected.

Employment and social protection and social security law ("SP")

There will be times when the School needs to use your information because we are an employer (e.g. we employ your teachers). Also, the School will use your information to comply with social protection law (e.g. to look after you) and social security laws.

Vital interests

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

Legal claims ("LC ")

We are allowed to use your information if this is necessary in relation to legal claims. For example, this allows us to share information with our legal advisors and insurers. This applies whenever sharing special category data is necessary in relation to legal claims.

Medical purposes ("MP")

This includes medical treatment and the management of healthcare services.

How and why does the School collect and use your personal information?

We set out below different ways in which we use personal information and where this personal information comes from. The letters highlighted in different colours below refer to the legal bases we are relying on. Please see the section above for an explanation.

1. The School's primary reason for using your personal information is to provide you with an education - LI, PI, SPI.
2. The School will also use your personal information to safeguard and promote your welfare and the welfare of others (for example, so that we can look after you if you are hurt) - LI, PI, SPI, SP, MP.

Admissions forms give us lots of personal information. We get information from you, your parents, your teachers, and other pupils. Your old school also gives us information about you so that we can teach and care for you.

Sometimes we get information from your doctors and other professionals where we need this to look after you.

3. We will use information about you during the admissions process e.g. when marking your entrance exams and learning more about you from your parents before you join the School. We may let your old school know if you have been offered a place at the School - LI, PI, SPI.
4. We need to tell the appropriate teachers if you are allergic to something or have a health issue - LI, PI, SPI.
5. We will need to tell your teachers if you have special educational needs or need extra help with some tasks - LI, PI, SPI.
6. We will need to share information about you (e.g. about your health and wellbeing) with the School doctor or counsellor - LI, PI, SPI, SP, MP.
7. Where appropriate, the School will have information about your religious beliefs and practices. For example, if you do not eat certain foods - LI, PI, SPI.
8. We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms - LI, PI, SPI.
9. We record your attendance and if you have time away from the School we record the reason(s) why - LI, PI, SPI.
10. We will need to report some of your information to the Welsh Government. We will need to tell the local authority that you attend the School, if you leave the School or let them know if we have any concerns about your welfare - LI, LO, PI, SPI, SP.
11. We are legally required to provide the Welsh Government with certain information about you and your classmates. They are only allowed to do this for limited purposes and they must be very careful about how they use your information.
12. We may need to share information about you with the Welsh Government if there is a health and safety issue at the School - LI, LO, PI, SPI.
13. The School is a charity which means that we may need to share your information with the Charity Commission which checks how we are behaving as a charity - LI, LO, PI, SPI.
14. We will need information about any court orders or criminal matters which relate to you. This is so that we can safeguard your welfare and wellbeing and the other pupils at the School - LI, PI, SPI.
15. If you are from another country, we have to make sure that you have the right to study in the UK. Sometimes the government will ask us to provide information as part of our reporting requirements. In addition to this we have a duty to provide information about you to UK Visas and Immigration who are part of the government - LI, LO, PI, SPI.
16. Depending on where you will go when you leave us we will provide your information to other schools, colleges and universities, UCAS or potential employers. For example, we will share information about your exam results and provide references - LI, PI, SPI.

17. We may pass on information to your next school which they need to look after you, for example, information about any concerns we have had about your welfare - LI, LO, PI, SPI, SP.
18. When you take public examinations (e.g. GCSEs) we will need to share information about you with examination boards. For example, if you require extra time in your exams - LI, PI, SPI.
19. The School is sometimes inspected to make sure that we are continuing to be a good school. We will have to make your information available to the inspectors to help them to carry out their job - LI, LO, PI, SPI.
20. If someone makes a complaint about how the School has behaved, we may need to use your information to deal with this appropriately. For example, if your parents complain that we have not looked after you properly - LI, PI, SPI.
21. We may need to share information about you with the police or our legal advisers if something goes wrong or to help with an enquiry. For example, if one of your classmates is injured at School or if there is a burglary - LI, LO, PI, SPI, LC.
22. We use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We will share your information with them if this is relevant to their work - LI, PI, SPI.
23. If you have misbehaved in a serious way, and the police have become involved, we will need to use information about the action taken by the police - LI, LO, PI, SPI, SP.
24. We may share some information with our insurance company to make sure that we have the insurance cover that we need - LI, PI, SPI, LC.
25. We will share your academic and (where fair) your behaviour records with your parents or education guardian so they can support your schooling - LI, PI, SPI.
26. We will monitor your use of email, the internet and mobile electronic devices e.g. iPads. This monitoring is sometimes carried out using computer software. In certain circumstances we will look at the content of your communications (e.g. emails and text messages). We monitor and look at your use of technology (e.g. your use of your phone) to check that you and your classmates are not misbehaving, at risk of harm or for other good reasons. If you would like more information about this you can read the acceptable use of IT and email policy or speak to your Housemaster / Housemistress / Tutor - LI, PI, SPI.
27. We may use photographs or videos of you for the School's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the School. We may continue to use these photographs and videos after you have left the School - LI.
28. Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson - LI. If you have concerns about us using photographs or videos of you, please speak to your Housemaster / Housemistress / Tutor.
29. We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing - LI.

30. We will keep details of your address when you leave in order to keep up to date you're your progress.. We may also pass your details onto the alumni organisation which is called the Old Ruthinian Association.

33. The School must make sure that our computer network is working well and is secure. This may involve information about you, for example, our anti-virus software might scan files containing information about you - LI.

34. We can keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the School – LI

We will only share your information with other people and organisations when we have a good reason to do so. In exceptional circumstances we may need to share it more widely than we would normally.

We sometimes use contractors to handle personal information on our behalf. The following are examples:

- a. IT consultants who might access information about you when checking the security of our IT network; and
- b. we use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the School site.

If you have any questions about any of the above, please speak to your Housemaster /Housemistress / Tutor.

Criminal offence information

In exceptional circumstances, we may use information about criminal convictions or offences. We will only do this where the law allows us to. This will usually be where such processing is necessary to carry out our obligations, to exercise our rights or to look after our pupils.

More than one basis

As you will see from the table above, in some cases we will rely on more than one basis for a particular use of your information. For example, we will rely on legitimate interests and public interest bases when using your information to look after you and your classmates and when providing you with an education. The basis that we will rely on for a particular purpose may vary depending on the circumstances. For example, if we decide to tell the local authority something about a pupil because we are worried about their welfare, sometimes this will be because we have a legal obligation to do so but on other occasions we may tell the local authority because we are worried about the pupil even if we don't have a legal obligation to report something (in which case we would be relying on legitimate interests and public interests).

Consent

We may ask for your consent to use your information in certain ways as an alternative to relying on any of the bases in the table above. For example, we may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on legitimate interests. If we ask for your consent to use your personal information you can take back this consent at any time.

Any use of your information before you withdraw your consent remains valid. Please speak to Housemaster / Housemistress / Tutor if you would like to withdraw any consent that you have given.

Sending information to other countries

We may send your information to countries which do not have the same level of protection for personal information as there is in the UK. For example, we may store your information on cloud computer storage based overseas.

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: https://ec.europa.eu/info/law/law-topic/data-protection/datatransfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en

If the country that we are sending your information to is not on the list or is not a country within the EEA (which means the European Union, Liechtenstein, Norway, Switzerland, and Iceland), then it might not have the same level of protection for personal information as there is in the UK.

We will provide you with details about the safeguards which we have in place outside of this privacy notice. If you have any questions about the safeguards that are in place, please contact The Bursar.

Ruthin School

Mold Road

Ruthin

LL15 1EE

01824 702543

For how long do we keep your information?

We keep your information for as long as we need to in order to educate and look after you. We will keep some information after you have left the School, for example, so that we can find out what happened if you make a complaint.

In exceptional circumstances we may keep your information for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

We can keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the School.

What decisions can you make about your information?

From 25 May 2018 you will be able to make various decisions about your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

- **Rectification:** if information is incorrect you can ask us to correct it.

- **Access:** you can also ask what information we hold about you and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about you, where it came from and what types of people, we have sent it to.

- **Deletion:** you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.

- **Portability:** you can request the transfer of your information to you or to a third party in a format that can be read by computer in certain circumstances.

- **Restriction:** our use of information about you may be restricted to simply storing it in some cases. For example, if you tell us that the information is inaccurate, we can only use it for limited purposes while we check its accuracy.

- **Object:** you may object to us using your information where:
 - we are using it for direct marketing purposes (e.g. to send you the School magazine);
 - the legal basis on which we are relying is either legitimate interests or performance of a task carried out in the public interest. Please see the section "Our legal bases for using your information" above;

- we are using it for historical or scientific research purposes or archiving purposes.
For example, we may keep photographs of your class for historical reasons.

Your Housemaster / Housemistress/ Tutor can give you more information about your data protection rights.

Further information and guidance

This notice is to explain how we look after your personal information. Your Housemaster / Housemistress can answer any questions which you might have for example, if:

- you would like to exercise any of your rights listed above; or
- you would like us to update the information we hold about you; or
- you would prefer that certain information is kept confidential.

The Bursar is in charge of the School's data protection compliance. You can ask your Housemaster / Housemistress / Tutor to speak to the Bursar or speak to the Bursar yourself. Alternatively, you can ask your parents to speak to us on your behalf if you prefer.

If you consider that we have not acted properly when using your personal information, you can contact the Information Commissioner's Office: ico.org.uk

How We Use Your Information

For Staff

Staff Privacy Notice

This Privacy Notice covers the following group of related companies and organisations.

Ruthin School

Introduction

1 This Privacy Notice (**Notice**) is to help you understand **how** and **why** we collect personal information about you and **what** we do with that information. It also explains the decisions that you can make about your own information.

2 This notice is aimed at all School staff (including employees, Governors, work experience/placement students, volunteers, certain contractors and agency staff) and applicants for employment vacancies. This Notice does not form part of your contract of employment and the School may amend this notice at any time.

What is "personal information"?

3 Personal information is information which is about you and from which you can be identified.

4 This includes your contact details, next of kin and financial information. We will also hold information such as your religion or ethnic group. CCTV, photos and video recordings of you are also personal information.

What personal information does the School hold about you and how is this obtained?

5 We set out below examples of the personal information the School holds about you and where this personal information comes from.

6 Information about you is gathered during the recruitment process for example:

6.1 information about your education, qualifications and professional achievements;

6.2 when you provide certain information to us, for example, on your application form and during any interviews;

6.3 when we obtain information from publicly available sources such as your social media profiles; and

6.4 when we receive your personal information (from you and third parties) in carrying out pre-employment checks, for example, when we receive references, confirmation of your fitness to work, your right to work in the UK and criminal records checks.

7 We will hold information about your job performance. This includes information about skills, achievements, career progression, performance and disciplinary related matters.

8 We hold and use your financial information, such as, your bank details, your salary and pension details.

9 Where appropriate, the School will have information about your religious beliefs and practices. For example, if you do not eat certain foods.

10 We will hold information about any physical or mental health condition you may have which is disclosed to the School during the recruitment process or at any stage during your employment.

11 We will hold information about any protected characteristics you may have (e.g. a disability) which you provide, for example, on the Equal Opportunities Monitoring Form.

12 Your personal information will be created internally by the School during the course of your employment. An email from the Head to a member of staff complimenting them on class management would be an example of this.

13 Your personal information may be acquired from outside of the School community such as from occupational health practitioners or from public authorities such as the Police or the Local Authority Designated Officer.

14 Pupils will often provide us with your personal information, for example, if a pupil email their form teacher to say how much they are helping them with their work.

15 Your personal information will be held on the School's Single Central Register.

Our legal bases for using your information

16 This section contains information about the legal bases that we are relying on when handling your information.

17 The two tables below contain a general description of the different legal bases but we have also used a colour code system so that you can see which bases we are relying on for each of the purposes described below.

Legitimate interests ("LI")

This means that the School is using your information when this is necessary for the School's legitimate interests except when your interests and fundamental rights override our legitimate interests.

Specifically, the School has a legitimate interest in:

- looking after your welfare and development and the welfare and development of others;
- safeguarding and promoting the welfare of pupils;
- providing an education to pupils;
- using photographs of you for promotional purposes (e.g. on the School's website);
- ensuring the security of the school site which may involve issuing you with a photo ID card;
- promoting the objects and interests of the School. This includes fundraising and using information about you in our publicity material e.g. photographs.

- making sure that you are complying with your employment obligations and that the School is complying with its employment obligations;
- using your information in connection with legal disputes. For example, if a parent or former pupil brings a claim against the School;
- facilitating the efficient operation of the School; and
- ensuring that all relevant legal obligations of the School are complied with (for example in relation to inspections).

In addition, your personal information may be processed for the legitimate interests of others. For example, with external activity providers if they need to contact you directly or for their own emergency or insurance purposes.

The School is relying on legitimate interests for all of the purposes described at paragraphs 18 to 37 except the purposes described in paragraph 19.8

Necessary for contract ("CT")

We will need to use your information in order to comply with our contractual obligations and for you to perform your obligations as well. For example:

- we need your name and bank details so that we can pay you your salary;
- we may need to provide your personal information to a pension provider so that you can benefit from your pension entitlement; and
- we also need to use your personal information to provide contractual benefits, such as a school fee discount.

Legal obligation ("LO")

As a School we have to comply with various laws and this entitles us to use your information where necessary. For example:

- to make sure that you have the right to work in the UK;
- to fulfil our duty of care to you and your colleagues;
- to fulfil our safeguarding duties towards pupils; and
- sometimes we will be legally obliged to disclose your information to third parties such as the DBS, local authorities or the police. More detail of when we will do so is set out at paragraph 22 below

Vital interests

We may use your information where this is necessary to protect your vital interests or someone else's. For example, to prevent someone from being seriously harmed or killed.

Performance of a task carried out in the public interest (or carrying out public tasks) ("PI")

The following are examples of when we use your information to perform tasks in the public interest:

- looking after your welfare and development and the welfare and development of others. This includes equal opportunities monitoring;
- safeguarding and promoting the welfare of our pupils;
- providing pupils with an education;
- ensuring the security of the school site which may involve issuing you with a photo ID card;
- making sure that you are complying with your employment obligations;
- facilitating the efficient operation of the School; and
- ensuring that we comply with all of our legal obligations.

The School must also comply with an additional condition where it processes special categories of personal information. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or orientation. The bases that we are relying on to process special categories of personal information are set out below:

Employment, social security and social protection ("ESP")

The processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the School and staff in the field of employment, social security or social protection. Social security and protection is concerned with preventing, managing, and overcoming situations that adversely affect people's wellbeing. For example, sometimes this would allow us to disclose your information to third parties such as the DBS or occupational health services. More detail of when we will do so is set out at paragraphs 22 and 23 above.

Vital interests

To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

Legal claims ("LC")

The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

Medical purposes ("MP")

This includes medical treatment and the management of healthcare services.

Substantial public interest ("SPI")

The School is also allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This is similar to "Public interest" in the table above.

Why does the School use your personal information?

18 The letters highlighted in different colours below refer to the legal bases we are relying on, please see the section above for an explanation.

19 We commonly use personal information for:

- 19.1 providing education and support to our pupils - LI, PI, SPI;
- 19.2 ensuring that we provide a safe and secure work environment - LI, PI, ESP, SPI;
- 19.3 providing employment services (such as payroll) - LI, CT;
- 19.4 providing training and support - LI, PI, SPI;
- 19.5 protecting and promoting the School's interests and objectives (including fundraising) - LI;
- 19.6 personnel, administrative and management purposes and to enable us to meet our legal obligations as an employer. For example, to pay staff and to monitor their performance - LI, CT, LO, PI, ESP, SPI;
- 19.7 safeguarding and promoting the welfare of all staff and pupils - LI, PI, ESP, SPI; and
- 19.8 fulfilling our contractual and other legal obligations - CT, LO, ESP.

20 Some specific examples of when the School uses your personal information are set out below:

- 20.1 We use your personal information to consider your suitability to work in your role at the School - LI, LO, PI, SPI.
- 20.2 We will check that you have the right to work in the UK by reviewing your identification documents and keeping copies on your personnel file - LI, LO.
- 20.3 We will use your personal information in addressing any performance or disciplinary concerns which arise - LI.
- 20.4 We will use information relating to any medical condition you may have in order to verify fitness to work, monitor sickness absence and comply with our duty of care towards you - LI.

20.5 We will use your information when dealing with complaints and grievances with which you are involved (e.g. from other staff, pupils and parents) - LI.

20.6 We often use photographs and video recordings of staff, for marketing and promotion purposes. This will include in School publications, in social media and on the School website - LI.

20.7 We will also allow external publication of certain media where appropriate (for example, a photograph or article in a local newspaper) - LI.

20.8 We may also make recordings for teaching purposes, for example, recording a drama lesson to provide feedback to you or pupils. We may also record lessons for pupils who were not able to attend in person - LI, PI, SPI.

20.9 We use CCTV recordings for the purposes of crime prevention and investigation and in connection with our obligation to safeguard the welfare of pupils, staff and visitors to the School site. Further information about the use of CCTV can be found in the School's CCTV policy (a copy of which is published on the School's website) - I, PI, SPI.

20.10 The School regularly monitors and accesses its IT system for purposes connected with the operation of the School. The School IT system includes any hardware, software, email account, computer, device or telephone provided by the School or used for School business. The School may also monitor staff use of the School telephone system and voicemail messages. Staff should be aware that the School may will] monitor the contents of a communication (such as the contents of an email) - LI, PI, SPI.

20.11 The purposes of such monitoring and accessing include:

20.11.1 to help the School with its day to day operations. For example, if a member of staff is on holiday or is off sick, their email account may be monitored in case any urgent emails are received - LI; and

20.11.2 to check staff compliance with the School's policies and procedures and to help the School fulfil its legal obligations. For example, to investigate allegations that a member of staff has been using their email account to send abusive or inappropriate messages - LI.

20.12 Monitoring may be carried out on a random basis and it may be carried out in response to a specific incident or concern - LI.

20.13 The School also uses software which automatically monitors the School IT system (for example, it would raise an alert if a member of Staff visited a blocked website or sent an email containing an inappropriate word or phrase). - LI

20.14 The monitoring is carried out by the IT Department. If anything of concern is revealed as a result of such monitoring, then this information may be shared with the Bursary and/or HR Manager and may result in disciplinary action. In exceptional circumstances concerns will need to be referred to external agencies such as the Police - LI.

20.15 We may use your information when ensuring network and information security, for example, our anti-virus software might scan files containing information about you - LI.

20.16 We will send you information about how to support the School, for example fundraising opportunities - LI.

20.17 We will keep details of your address when you leave our employment, so we can send you information about the School and keep in touch - LI.

20.18 If we provide you with accommodation under your contract of employment we will use your personal information as part of this provision - LI, CT, PI, ESP, SPI.

20.19 We can keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the School - LI.

21 If you fail to provide certain information when requested, we may not be able to perform our obligations under the contract of employment or agreement we have entered into with you (such as paying you or providing a benefit). Alternatively, we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

How does the School share staff personal information with third parties?

22 We will need to share your information with:

22.1 the Disclosure and Barring Service (DBS), and/or the Teaching Regulation Agency (previously known as the National College for Teaching and Leadership (if applicable) when complying with our legal duty to carry out pre-appointment suitability checks - LI, LO, PI, ESP, SPI; and

22.2 the DBS and/or Teaching Regulation Agency (if applicable) if circumstances arise in which we are required to make a referral to either or both of these bodies - LI, LO, PI, ESP, SPI.

23 To fulfil our obligations to you as an employer we will need to share your information with medical professionals, such as occupational health services, where we are making a referral - LI, CT, MP.

24 Occasionally we may use consultants, experts and other advisors (including legal advisors and accountants) to assist us in fulfilling our obligations and to help run the School properly. We will share your information with them if this is relevant to the work they carry out - LI, PI, ESP, LC, SPI.

25 In accordance with our legal obligations, we will share information with the Independent Schools Inspectorate / Estyn, for example, during the course of an inspection, and may need to share your information with the Department for Education - LI, LO, PI, ESP, SPI.

26 As an employer we must check if you can work in the UK before we employ you. Additionally, if you are sponsored by us under Tier 2 or Tier 5 in certain circumstances we will have to provide information about you to UK Visas and Immigration to comply with our duties as a Tier 2/5 sponsor - LI, LO, SPI.

27 We may share some of your information with our insurance company, for example, where there is a serious incident at the School - LI, LC.

28 We may share your information with benefits providers, for example, to ensure that you are able to take advantage of the benefit - LI, CT, PI, ESP, SPI.

29 We may need to share information about you with the Health and Safety Executive (a government organisation) if there is a health and safety issue at the School - LI, LO, PI, ESP, SPI.

30 The School is a charity which means that in exceptional circumstances we may need to share your information with the Charity Commission e.g. in the event of a serious incident. - LI, LO, PI, ESP, SPI.

31 If the School is dealing with a complaint or grievance (e.g. from a colleague or a parent), we will need to share your information with other parties if it is relevant, for example, the appropriate staff at the School, the colleague or parents making the complaint and governors - LI, PI, SPI.

32 If appropriate, we will share your information with individuals connected to the School who are exercising their data protection rights, for example, when responding to a subject access request - LI, LO.

33 We will share personal information about staff with the relevant statutory agencies if it is appropriate to share this information to investigate allegations of misconduct - LI, LO, PI, ESP, SPI.

34 We may need to share your information with the Local Authority Designated Officer in accordance with our safeguarding obligations - LI, LO, PI, ESP, SPI.

35 On occasion, we may need to share your information with the Police for the prevention and investigation of crime and the prosecution of offenders. We will only do this in specific circumstances to assist the police with their investigations. In exceptional circumstances CCTV recordings may be disclosed to third parties such as the police - LI, LO, PI, ESP, SPII.

36 If appropriate, we will share your information with parents and pupils where this is related to your professional duties, such as information about the subjects you teach - LI, PI, ESP, SPI.

37 We may need to share your information if there is an emergency, for example, if you are hurt in an accident - LI, PI, ESP, SPI.

We sometimes use contractors to handle personal information on our behalf. The following are examples:

IT consultants who might access information about you when checking the security of our IT network; and

we use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the School site.

Transfers of your personal information overseas

38 We may send your information to countries which do not have the same level of protection for personal information as there is in the UK. For example, we store your information on cloud computer storage based overseas.

39 The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: http://ec.europa.eu/justice/dataprotection/international-transfers/adequacy/index_en.htm

40 If the country that we are sending your information to is not on the list or is not a country within the EEA (which means the European Union, Liechtenstein, Norway, Switzerland, and Iceland), then it might not have the same level of protection for personal information as there is in the UK.

41 We will provide you with details about the safeguards which we have in place outside of this privacy notice. If you have any questions about the safeguards that are in place, please contact the Bursar. For how long does the School keep staff personal information?

42 We keep your information for as long as we need to in relation to your employment. We will keep some information after you have left the School in case this is needed, for example, in relation to our legal obligations.

43 In exceptional circumstances we may keep your information for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

Please see our Information and Records Retention Policy for information on how long we keep your personal information for.

Processing in line with your rights

44 From May 2018 data protection legislation gives you a number of rights regarding your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

44.1 **Rectification:** if information the School holds about you is incorrect you can ask us to correct it.

44.2 **Access:** you can also ask what information we hold about you and be provided with a copy of it. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about you, where it came from and what types of people, we have sent it to.

44.3 **Deletion:** you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.

44.4 **Portability:** you can request the transfer of your information to you or to a third party in a format that can be read by computer. This applies where (a) the information has been provided by you; (b) the basis that we are relying on to process your information is consent or contract (please see "Our legal bases for using your information" below); and (c) the information is being processed by us on computer.

44.5 **Object:** you may object to us using your information where:

44.5.1 we are using it for direct marketing purposes (e.g. to send you the School magazine);

44.5.2 we are relying on either the legitimate interests or performance of a task carried out in the public interest legal basis to use it - please see the section "Our legal bases for using your information" above;

44.5.3 we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of staff for historical reasons.

44.6 **Restriction:** our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate, we can only use it for limited purposes while we check its accuracy.

The Bursar can give you more information about your data protection rights. To exercise any of your rights you can submit your request in writing to The Bursar Bursar@ruthinschool.co.uk.

Criminal offence information

We may only use information relating to criminal convictions and offences where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations or to exercise our rights.

Less commonly, we may use information relating to criminal convictions and offences where it is necessary in relation to legal claims, where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Consent

We may ask for your consent to use your information in certain ways as an alternative to relying on any of the bases in this Notice. For example, we may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on legitimate interests. If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. You can speak to The Bursar if you if you would like to withdraw any consent given.

More than one basis

As you will see from this Notice, in some cases we will rely on more than one basis above for a particular use of your information. For example, we will rely on legitimate interests and public interest bases when using your information in connection with educating our pupils. The basis that we will rely on for a particular purpose may vary depending on the circumstances. For example, if we decide to tell the local authority something about a safeguarding concern, sometimes this will be because we have a legal obligation to do so but on other occasions we may tell the local authority because we are worried even if we don't have a legal obligation to report something (in which case we would be relying on legitimate interests and public interests).

Further information

45 This privacy notice does not, and is not intended to, give you any rights which you did not already have. For example, it does not give you any additional employment or contractual rights.

46 Contact: If you would like any further information about anything within this notice please contact The Bursar..

47 Please speak to the Bursar:

47.1 you would like us to update the information we hold about you; or

47.2 you would prefer that certain information is kept confidential.

48 ICO: If you consider that we have not acted properly when using your personal information, you can contact the Information Commissioner's Office: ico.org.uk.

RUTHIN SCHOOL

DATA PROTECTION POLICY

1. THE SCHOOL'S DUTIES

1.1. The School needs to process personal data in respect of current, prospective and former pupils and their parents or guardians; current, prospective and former staff; suppliers, contractors and volunteers; current and prospective supporters and other individuals connected to the School, as part of its everyday operations and is fully aware of our legal obligations in the storage; security and processing of data in accordance with the Data Protection Act 2018.

1.2. The School is the Data Controller of this personal data under the Data Protection Act 2018 and has notified its use of personal data with the Information Commissioner's Office. The School is committed to compliance with the Data Protection Act 2018 and takes seriously the responsibility of handling personal information.

1.3. This policy has been developed to ensure that the School meets its obligations under the Data Protection Act 2018.

2. DATA PROTECTION OFFICER

2.1. The School has not appointed a Data Protection Officer, but The Bursar has responsibility for all data protection matters and the General Data Protection Regulations.

2.2. The Bursar is responsible for:

2.3. The School's notification as a data controller with the Information Commissioners Office and the notification (where required) of the School's subsidiary companies or trusts as data controllers;

2.4. Endeavouring to ensure that personal data is processed by the School in compliance with this Policy and the data protection principles contained in the Data Protection Principles;

2.5. Arranging appropriate training for members of the School's staff who are responsible for processing personal data; and

2.6. The enforcement, monitoring and review of this Policy.

3. DATA PROTECTION PRINCIPLES

3.1. All employees of the school have an individual responsibility to adhere to the rules contained within the Act known as the Data Protection Principles. They must ensure that information is:

3.2. Fairly and lawfully processed;

3.3. Processed for a lawful purpose

3.4. Adequate, relevant and not excessive;

3.5. Accurate and up to date;

3.6. Not kept for longer than necessary;

3.7. Processed in accordance with the data subject's rights;

3.8. Protected by appropriate security; and

3.9. Not transferred to other countries without adequate protection.

4. PERSONAL DATA PROCESSED BY THE SCHOOL

4.1. Personal data processed by the School can take different forms – it may be factual information, expressions of opinion, images or other recorded information which identifies or imparts something of significance about a living individual.

4.2. Personal data processed by the School includes contact details and (for staff and contractors), additional information required for their employment or appointment, including images and biometric data; (for pupils) registration details, academic, disciplinary and other education related records, information about special educational needs, references, examination scripts and marks, images and biometric data; (for parents and or guardians) employment details and financial information.

4.3. Sensitive personal data processed by the School about an individual includes data concerning their ethnic group, religious beliefs, criminal records and proceedings, trade union membership and relevant medical information.

4.4. The School collects the personal data it processes directly from the data subject (or in the case of a pupil, his parents or guardians) and from third parties (for example referees, the Disclosure and Barring Service).

5. PURPOSES FOR WHICH PERSONAL DATA MAY BE PROCESSED

5.1. Personal data (including sensitive personal data, where appropriate) is processed by the School in accordance with the Data Protection Act 2018 for the following purposes:

5.2. The provision of education including the registration of prospective pupils and administration of the admissions process; administration of the School's curriculum and timetable; administration of pupil's entries to public examinations, reporting upon and

publishing the results; providing references for pupils (including after a pupil has left); preparation of information for inspections by Estyn..

5.3. The provision of educational support and ancillary services, including the provision of pastoral care, welfare, health care services and maintenance of discipline; provision of careers and library services; administration of School Trips, boarding house administration; the administration of the School's IT Policy by monitoring pupils' email communications, internet use and telephone calls.

5.4. The general administration of the School including the compilation of pupil records; the administration of invoices, fees and accounts; the management of the School's property, the management of security and safety arrangements (including the use of CCTV); the administration and implementation of the School's policies; and other reasonable purposes related to the School's operations.

5.5. The protection and promotion of the School's legitimate interests and objectives including the publication of its website, the prospectus, fixtures and other promotional fundraising publications; fund-raising for the School's charitable purposes; the maintenance of a historic archive; and communication with the body former pupils.

5.6. The administration of its staff, agents and suppliers, including the recruitment of staff or engagement contractors (including compliance with DBS procedures); administration of payroll, pensions and sick leave and the maintenance of appropriate human resources records for current and former staff; and providing references.

5.7. The fulfilment of the School's contractual and other legal obligations.

5.8. The commercial trading operations of the School.

6. PROCESSING OF PERSONAL DATA

6.1. The School will only process personal data for the purpose(s) for which it was originally acquired and will not process it for any other purpose without the subject's permission, unless it is permitted to do so under the Data Protection Act 2018 or with any other agreement with the School. The School may also communicate with data subjects for the purposes set out above by post, email and SMS.

6.2. Personal data shall only be disclosed to those members of the School's staff, agents and suppliers who need access to the personal data to carry out the purpose(s) for which it was acquired. The School adopts appropriate security measures to ensure that personal data is kept secure and not processed without proper authority. The School observes legislative requirements and current best practice to ensure personal data is kept for not longer than is necessary.

6.3. The School will not transfer personal data outside of the EEA unless it is satisfied that the data subject's rights under the Data Protection Act 2018 will be protected.

6.4. The School would seek permission from an individual and, in the case of a pupil, the parents, before allowing that person to feature particularly prominently in documentary films or articles for which the School may give permission.

6.5. When processing personal data for the purposes set out above, the School may communicate by post, email and SMS and may make use of cloud computing services.

7. THIRD PARTIES WITH WHOM THE SCHOOL MAY NEED TO SHARE PERSONAL DATA

7.1. From time to time the School may pass personal data (including sensitive personal data, where appropriate) to third parties, including local authorities, other public bodies (e.g. the DBS, UK Border Agency, HM Revenue and Customs, Department for Education and Department for Work and Pensions), independent school bodies such as the Independent Schools Inspectorate and the Independent Schools Council, health professionals, the School's professional advisors and its subsidiaries who will process the data:

7.2. To enable relevant authorities to monitor the School's performance;

7.3. To compile information (normally used on an anonymous basis);

7.4. To secure funding for the School or on behalf of individual pupils;

7.5. To safeguard pupils' welfare and provide appropriate pastoral (and where relevant, medical) care;

7.6. Where specifically requested by pupils and or their parents or guardians;

7.7. Where necessary in connection with learning and co-curricular activities undertaken by pupils;

7.8. To enable pupils to take part in public examinations and other assessments and to monitor their progress and educational needs;

7.9. To obtain appropriate professional advice and insurance of the School;

7.10. Where a reference or other information about a pupil or Old Ruthinian is requested by another educational establishment or employer to whom they have applied;

7.11. Where otherwise required by law; and

7.12. Otherwise where reasonably necessary for the operation of the School and employment of its staff.

7.13. The School may also share personal data about an old Ruthinian (OR) with the Old Ruthinian Association.

8. RIGHTS OF ACCESS TO PERSONAL DATA

8.1. As data subjects, individuals have certain rights under the Data Protection Act, DfE including a general right to be given access to personal data held about them and any data controller. The Information Commissioners Office guidance is that in the majority of cases, by the age of 12 an individual has sufficient maturity to understand his/her rights and to make an access request his/herself if he/she wishes.

8.2. If individuals wish to access their personal data held by the School or, in the case of parents, if they wish to access personal data held about their child or a pupil for whom they have parental responsibility, then a request should be submitted to The Bursar in writing.

8.3. The School aims to respond to such access requests as quickly as possible and will ensure that if any information is provided within 30 days unless an exemption from the right of access under the Data Protection Act 2018 applies.

9. ACCURACY

9.1. The School will endeavour to ensure that all personal data held in relation to individuals is accurate and up to date. Individuals must notify the School of any changes to information held about them. An individual has the right to request that inaccurate information about them is corrected.

10. SECURITY

10.1. The School will take reasonable steps to ensure that personal data is kept secure and is only accessed by authorised members of its staff for the purposes for which it is held. All staff will be made aware of this Data Protection Policy and their duties under the Data Protection Act 2018.

11. ENFORCEMENT

11.1. If an individual believes that the School has not complied with this policy or has acted otherwise than in accordance with the Data Protection Act 2018, the individual should notify The Bursar who shall, where appropriate, refer the matter for resolution in accordance with the School's grievance and/or disciplinary procedure (for staff) or complaints procedure (for parents/pupils).

11.2. This policy forms part of the Terms and Conditions of all employees' contracts of employment. A breach of the policy may be regarded as misconduct, leading to disciplinary action up to and including summary dismissal.

12. GUIDANCE

12.1. Any queries about this Policy or how personal data is processed by the School should be referred to The Bursar for further guidance.

ANNEX 1

SCHOOL POLICY DATA PROTECTION PRINCIPLES

- Access to personal data is provided to members of staff who require access to that personal data to perform their duties and responsibilities. As a result, different members of staff will have access to different categories of personal data depending on their role.

- The security measures in place to protect data held electronically are set out in the School's IT Policy. All data on the School's networks is protected by anti-virus software that runs on servers and workstations and is updated automatically. Data on the School's network is regularly backed up.
- Personal data in manual files is only accessible by authorised individuals and, whereof a confidential nature, is kept under lock and key when not in use.
- Paper based copies of personal data (or other sensitive or confidential data) are disposed of in a secure manner, by shredding. Decommissioned IT equipment is wiped prior to its disposal.
- The physical security of the Schools premises is checked by the maintenance department daily.
- The School ensure that prior to the transfer of any personal data to a third party for processing, the third party has appropriate technical and organisational security measures governing the processing to be carried out.
- Staff receive data security training as part of their training.
- Any lapses in data security must be reported to The Bursar at the earliest opportunity who may be contacted at:

The Bursar

Ruthin School

Mold Road

Ruthin

LL15 1EE

United Kingdom