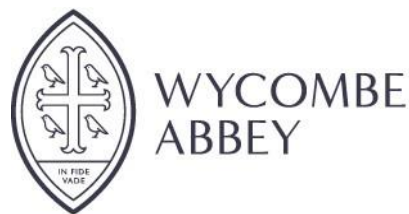


# Privacy Notice

## For Parents and Pupils

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

If you have any questions about this notice, please contact the Head of Compliance:

[complianceoffice@wycombeabbey.com](mailto:complianceoffice@wycombeabbey.com)

### Who we are

We (the School or Us) means Wycombe Abbey, the trading name of The Girls' Education Company Limited, and a Charitable company limited by guarantee. The Directors of the Company constitute the governing Council of Wycombe Abbey and are the Trustees of the Charity. We are registered in England, No 47031. Registered Office: Wycombe Abbey School, High Wycombe, Buckinghamshire, HP11 1PE, Registered Charity No: 310638

For the purposes of the UK General Data Protection Regulations and Data Protection Act 2018 ("the DPA"), Wycombe Abbey is the "data controller" of personal information about pupils and their parents and/or guardians ("your personal information").

### What is this Privacy Notice for?

This Privacy Notice is intended to provide information about how we will use (or "process") personal information about individuals including: current, past and prospective pupils ("pupils"); and their parents, carers or guardians (referred to in this notice as "parents"). This information is provided in accordance with the rights of individuals under Data Protection Law to understand how your personal information is used. All parents and pupils are encouraged to read this Privacy Notice and understand our obligations to you and the entire school community. We have also produced a summary document of this notice for pupils to read.

We have a separate Data Protection Policy and Privacy Notice applicable to staff, contractors and council members.

This **Privacy Notice** applies alongside any other information we may provide about a particular use of your personal information, for example when collecting information via an online or paper form.

This **Privacy Notice** also applies in addition to other relevant terms and conditions and policies we have in place, including:

- any contract between us and the parents of pupils;
- CCTV and Surveillance policy;
- Biometrics policy;
- Taking, storing and using images policy;
- Retention of records policy;
- Safeguarding, pastoral, or health and safety related policies, including as to how concerns or incidents are recorded; and
- IT policies, including its Pupil's Responsible Use policy, Online Safety policy, and Bring Your Own Device policy.

Anyone who works for, or acts on behalf of, the School (including staff, volunteers, governing council members and service providers) are subject to suitable training and should comply with this Privacy Notice and our data protection procedures.

### **Responsibility for Data Protection**

We have appointed the Head of Compliance to act as our Data Protection Lead with responsibility for data protection in the School, and who will deal with all your requests and enquiries concerning our uses of your personal information (see section on Your Rights below). We will endeavour to ensure that all personal information is processed in compliance with this policy and Data Protection Law.

The Head of Compliance can be contacted by email: [complianceoffice@wycombeabbey.com](mailto:complianceoffice@wycombeabbey.com)

### **What is personal information?**

Personal information, often referred to as data, is information that identifies you as an individual.

This includes information such as your contact details, emergency contacts, medical history and financial information. We may also hold information such as your religion or ethnic group. CCTV, photos and video recordings of you are also personal information.

### **Why we need to collect and use your personal information**

In order to carry out our ordinary duties to pupils and parents, we need to process a wide range of personal information about you as an individual (whether as a current, past or prospective pupil or parent). Our primary reason for using personal information is to provide education services.

Sometimes we will need to collect information in order to fulfil our legal rights, duties or obligations, including those under a contract with the parents of our pupils.

Other uses of personal information will be made in accordance with our legitimate interests, or the legitimate interests of another, provided that this is not unfair on individuals, and provided it does not involve special or sensitive types of information.

Our legal grounds for using your information will fall within the category of “**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, spiritual development, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law;
- To enable relevant authorities, including our governing Council, 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, and to publish the results of public examinations or other achievements of pupils of the school;
- To safeguard pupils' welfare and provide appropriate pastoral care. We also need information about any court orders or criminal petitions which relate to you;
- To monitor (as appropriate) use of our IT and communications systems in accordance with the

- school's E-safety policy and Pupils Responsible IT Use policy;
- To make use of photographic images of pupils in our publications, on our website and (where appropriate) on our social media channels in accordance with our policy on taking, storing and using images of children;
- To carry out or cooperate with any School or external complaints, disciplinary or investigation process;
- For security purposes, including biometrics and CCTV in accordance with our biometric and CCTV policies;
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School;
- To maintain relationships with the School community (current Parents and Pupils) and Seniors, including parents of former pupils, sending information, School publications, newsletters and invitations about school events and activities taking place (including fundraising);
- For the purposes of donor due diligence, and to profile prospective donors and their background and relevant interests; and For the purposes of historical interest to maintain an archive record for ongoing research value, archiving in the public interest and used for historic, scientific or statistical research.

In addition, we will on occasion need to process **special category personal information** (concerning health, ethnicity, religion, biometrics) or duties imposed on us by law, including as regards safeguarding, or from time to time by explicit consent where required. These reasons will include:

- To safeguard pupils' welfare and provide appropriate pastoral care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of a medical condition or other relevant information where it is in your interests to do so. Such as, for medical advice, for social protection, safeguarding, cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be aware of dietary or medical needs;
- To provide educational services in the context of any special educational needs of a pupil;
- To provide spiritual education in the context of any religious beliefs;
- To run any of its systems that operate on biometric data, such as for security, payment systems and other forms of pupil identification;
- As part of any school or external complaints, disciplinary or investigation process that involves such information, for example if there are SEN, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

We may ask for your consent to use your information in certain ways. 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 contact [complianceoffice@wycombeabbey.com](mailto:complianceoffice@wycombeabbey.com) if you would like to withdraw any consent given.

In most cases we will rely on one of the grounds above for a particular use of your information. Types personal information we process. Here are some examples:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (in relation to those who use our car parking facilities);
- biometric information, which will be collected and used in accordance with our biometrics policy;
- bank details and other financial information, e.g. about parents (or others) who pay fees to the school including in some cases we get information from third parties such as any anti-money laundering information we are required to collect by law, credit reference agencies or a previous school;
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- where appropriate, information about health and welfare, and contact details for emergency contacts;

- references given or received by us about pupils, and information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- correspondence with and concerning pupils and parents, future, past and present;
- 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;
- personal information is used to profile parents for fundraising activities;
- careers and professional information to support our careers programme of events; and
- sharing individual pupils' significant achievements with our governing Council.

### **How we collect information**

Generally, we receive personal information from the individual directly (including, in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

However, in some cases personal information may be supplied by third parties (for example another school, or other professionals or authorities working with that individual); or collected from publicly available resources such as internet searches, in order to undertake due diligence on donors or profile prospective donors.

### **Sharing personal information with third parties**

For the most part, personal information collected by us will remain with the School, and will be processed by appropriately trained individuals in accordance with access protocols (ie on a need to know basis). However, some functions are outsourced including educational services, cloud storage, catering and emailing communications. In accordance with Data Protection Law this type of external data processing is subject to contractual assurances that personal data will be kept securely and used only in accordance with Schools specific directions.

Occasionally, we will need to share personal information relating to our community with third parties, such as:

- professional advisers (lawyers, insurers and accountants);
- relevant authorities (Department of Education, Independent Schools Inspectorate, police or the local authority);
- appropriate contractors, such as caterers, tennis coaches, trips and activity organisers;
- examination boards; and
- stage 3 complaints panels, which include independent panel members.

In accordance with our legal obligations, we will share information with local authorities, the Independent Schools Inspectorate and the Department for Education, for example, where we have any safeguarding concerns.

We share personal information with external consultants and mailing houses to support our Development and External Relations Department.

Pupils who are not British nationals - we have to make sure that you have the right to study in the UK. We might have to provide information about you to UK Visas and Immigration to comply with our duties under our Child Student Visa Sponsor Licence.

If you are a parent and 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.

If your child leaves us to attend another school we may need to provide that school with information about you. For example, details of family circumstances for safeguarding reasons.

For the most part, personal information collected by the School will remain within the School, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- medical records held and accessed only by the school doctor and appropriate medical staff under his/her supervision, or otherwise in accordance with express consent; and
- pastoral or safeguarding files held by the Headmistress and Designated Safeguarding Lead(s).

However, a certain amount of any SEND pupil's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

We are under duties imposed by law and statutory guidance (including [Keeping Children Safe in Education](#)) to record or report incidents and concerns that arise or are reported, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This may include file notes on safeguarding files, and in some cases referrals to relevant authorities such as the LADO or police. For further information about this, please view the Safeguarding and Child Protection Policy.

We have in place software to monitor pupils use of technology (e.g. email, internet, mobile devices) for the following purposes:

- to safeguard or promote pupil's welfare;
- to avert a perceived risk of serious harm to pupils or to another person at the School; or
- to alert our staff to a particular vulnerability the pupil may have.

In accordance with Data Protection Law, where processing activity is carried out on our behalf by third parties, such as IT systems, web developers or cloud storage providers, they will have access to personal data. This is always subject to contractual assurances that personal information will be kept securely and only in accordance with the school's specific directions.

### **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; or
- communicate with you by email when you are overseas (for example, when you are on holiday).

We can provide you with details about the safeguards which we have in place outside of this privacy notice. If you have any questions about these safeguards, please contact us at: [complianceoffice@wycombeabbey.com](mailto:complianceoffice@wycombeabbey.com).

### **How long we keep personal information**

We will keep personal information securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep pupil files is up to 7 years following departure from the school, generally when the pupil reaches 25 years of age. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements, currently these files are held indefinitely.

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.

As an example, the table below shows for how long we keep different types of your information.

Type of information	Retention period or the criteria used to determine the retention period
Prospective Pupils	Application forms and assessments results are held for one year. Those unsuccessful in obtaining a place at Wycombe Abbey records are destroyed after one year, unless consent for us to retain is provided.  Successful applications are held until the pupil reaches 25 years of age.*
Pupils Central Personal School File	Held until the pupils reaches 25 years of age.*
Public Examination Results and School Achievements	We retain a record of results in public examination, lists of school prizes and other significant achievements indefinitely for archives.
School Fee Records	According to current company, Inland Revenue and Customs and Excise legislation all financial information has to be retained for a period of 6 years. At Wycombe Abbey such information is held for 7 years.
Daily Attendance Registers	Date of register plus 3 years
Donations	Likely to be held indefinitely, even after death

\*Subject to where relevant to safeguarding considerations: any material which may be relevant to potential claims should be kept indefinitely.

If you have any specific queries about how our retention policy is applied, or wish to request that personal information that you no longer believe to be relevant is considered for erasure, please contact [complianceoffice@wycombeabbey.com](mailto:complianceoffice@wycombeabbey.com) However, please bear in mind that we will often have lawful and necessary reasons to hold on to some personal information even following such a request.

A limited and reasonable amount of information will be kept for archiving purposes, for example years of attendance at the School and House the pupil belonged to; and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a suppression record).

### Keeping in touch and supporting us

In order to carry out our charitable aims the School may from time to time use the contact details of parents, Seniors (alumni) and other members of the school community to keep them updated about the school, fundraising activities or events of interest, including by sending updates and newsletters, by email and by post.

Where necessary we will always gain consent for electronic direct marketing material under the Privacy and Electronic Communications Regulations (PECR).

Unless you object, we may also:

- Share personal information about parents and/or Seniors, as appropriate, with organisations set up to help establish and maintain relationships with the school community; or
- Collect information from publicly available sources about parents' and former pupils' occupation and activities, in order to maximise the school's fundraising potential.

Should you wish to limit or object to any such use, or would like further information about them, please contact [complianceoffice@wycombeabbey.com](mailto:complianceoffice@wycombeabbey.com) You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the school may need nonetheless to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

## **YOUR RIGHTS - What decisions can you make about your**

### **information Rights of access**

As Individuals you have various rights under Data Protection Law to access and understand what personal information is held by us, and in some cases ask for it to be erased or amended or have it transferred to others, or for us to stop processing it but subject to certain exemptions and limitations.

If you wish to access or amend your personal information, or wish it to be transferred to another person or organisation, or you have some other objection to how your personal information is used, you should put your request in writing to the Head of Compliance: [complianceoffice@wycombeabbey.com](mailto:complianceoffice@wycombeabbey.com)

We 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.

We will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, we may ask you to reconsider or require a proportionate fee but only where Data Protection Law allows it.

### **Requests that cannot be fulfilled**

You should be aware that the right of access is limited to your own personal data, and certain information is exempt from the right of access. This will include information which identifies other individuals, (and parents need to be aware this may include their own child, in certain limited situations – please see further below), 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).

We are 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 information: for example, 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.

### **Pupil requests**

Pupils can make subject access requests for their own personal information, provided that, in our reasonable opinion, they have sufficient maturity to understand the request they are making (see section Whose Rights? below). A pupil of any age may ask a parent or other representative to make a subject access request on their behalf.

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of pupils, the law still considers the information in question to be the child’s. The parent making the request will need to evidence their child’s authority for a specific request.

Wycombe Abbey pupils are generally assumed to have a level of maturity sufficient to have a say in this decision, although this will depend on both the child and the personal information requested, including any relevant

circumstances at home.

All information requests from, or on behalf of, pupils – whether made under subject access or simply as an incidental request – will therefore be considered on a case by case basis.

### **Parental requests**

It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about pupils without their consent. We will consider whether there are lawful grounds for sharing with or without reference to the pupil.

Parents will in general receive educational and pastoral updates about their child, in accordance with the Parent Contract. Where parents are separated, the school will in most cases aim to provide the same information to each person with parental responsibility, but may need to factor in all circumstances including court orders and the express wishes of the child.

All information requests whether made under subject access, or simply as an incidental request, will therefore be considered on a case by case basis.

### **Consent**

If we are relying on your consent as a means to process personal information, you may withdraw that consent at any time (subject to level of maturity and age considerations as above).

Examples where we do rely on consent to hold information are:

- Biometrics;
- Parent/Seniors - careers and employers;
- Email communications permission for Seniors and friends of Wycombe Abbey groups;
- As part of your inclusion in any parent directory.

Please be aware however that we may have another lawful reason to process the personal information in question even without your consent. That reason will usually have been asserted under this Privacy Notice, or may otherwise exist under some form of contract or agreement with the individual (e.g. a parent contract, or because of the purchase of a service such as the Living Tennis Academy).

### **Whose rights?**

The rights under Data Protection Law belong to you, the individual, to whom the information relates. However, we will often rely on parental authority or notice for the necessary ways we process personal information relating to pupils - for example, under the parent contract, or via a form. Parents and pupils should be aware that this is not necessarily the same as the school relying on strict consent. (see consent section above).

Where consent is required, it may be necessary or appropriate, given the nature of the processing in question, and the pupil's age and understanding to seek the pupil's consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

In general, we will assume that pupils' consent is not required for ordinary disclosure of their personal information to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare, that is unless, in our opinion, there is a good reason to do otherwise.

However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal information being disclosed to their parents, we may be under an obligation



to maintain confidentiality unless, in our opinion, there is a good reason to do otherwise; for example, where we believe disclosure will be in the best interests of the pupil or other pupils, or if required by law.

Pupils are required to respect the personal information and privacy of others, and to comply with the Responsible Use of Digital Devices Policy and the School Community Rules.

#### **What decisions can you make about your information**

- if information is incorrect you can ask us to correct it;
- you can ask what information we hold about you and be provided with a copy. 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;
- you can ask us to delete the information that we hold about you in certain circumstances, e.g. where we no longer need the information;
- you can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer; and
- our use of information about you may be restricted in some cases, e.g. if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.

#### **DATA ACCURACY AND SECURITY**

We will endeavour to ensure that all personal information held in relation to you is as up to date and accurate as possible. You must please notify us of any significant changes to important information, such as contact details.

You have the right to request that any out-of-date, irrelevant or inaccurate information about you is erased or corrected (subject to certain exemptions and limitations under Data Protection Law). Please see above for details of why we may need to process your information, of who you may contact if you disagree.

We will take appropriate technical and organisational steps to ensure the security of personal information about individuals, including policies around use of technology and devices, and access to school systems. All staff and governing council members will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

#### **THIS POLICY**

We 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.

#### **QUERIES AND COMPLAINTS**

The Head of Compliance 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 obtain fairly.

Please speak to the Head of Compliance if:

- you object to us using your information for fundraising purposes e.g. to send you information about school developments. We will stop using your information for fundraising 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.

Any comments or queries on this policy should be directed to the Head of Compliance using the contact details:  
[complianceoffice@wycombeabbey.com](mailto:complianceoffice@wycombeabbey.com)

If you believe that we have not complied with this policy or acted otherwise than in accordance with Data Protection Law, you should utilise the school complaints procedure and should also notify us. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the school before involving the regulator.

Reviewed August 2023

VERSION: PNPP/v9/24