Privacy Notice

See also: Privacy Notice for Staff, Development Office Privacy Notice and the summary privacy notice for Students.

Action	**Policy to be reviewed biennially**		
	Owner	**Date**	**Completed**
Review	Bursar	January 2025	✓
Approved	Senior Management Team	27 February 2025	✓
Next Review		Spring 2027	

To be published on the following:	
Staff Portal	✓
School website	✓

1. WHO WE ARE

1.1 St Paul's Girls' School (the school) is a company limited by guarantee (company number 6142007, registered charity 1119613). We take our responsibilities as a data controller seriously and we are committed to processing your personal data in accordance with the law.

2. WHO THIS PRIVACY NOTICE APPLIES TO

2.1 This notice applies to staff (including temporary staff, agency workers, volunteers and all other people when working in or for the school), governors, current, past and prospective students and their parents, carers or guardians (referred to in this policy as "parents"). It also applies to visitors to the school who may supply us with their personal data (e.g., when attending events). We also have a summary notice for students *How we use your information* and alumnae and fundraising activities are covered in more detail in the Development Office Privacy Notice. Both are published on our website: Privacy Policy - St Paul's Girls' School (spgs.org).

2.2 If you have any questions about this Privacy Notice or on how we use your personal data, please contact the Bursar at the school (see page 9 below).

3. WHAT THIS PRIVACY NOTICE IS FOR

3.1 This privacy notice is intended to provide information about how we will use (or "process") personal data about individuals. This information is provided because Data Protection Law (as detailed in paragraph 12 below) gives individuals rights to understand how their data is used. Staff and parents are encouraged to read this privacy notice and understand the school's obligations to its entire community. Students are supplied with a copy of the summary notice *How we use your information*.

3.2 This privacy notice applies alongside any other information we may provide about a particular use of personal data, for example when collecting data via an online or paper form, and the information provided to parents about our processing of personal data in relation to online lessons.

3.3 This privacy notice also applies in addition to the school's other relevant terms and conditions and policies, including:

- Terms and Conditions of the Parent Contract;
- The school's record retention procedures;
- the school's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded;
- the school's IT policies, including the Staff Acceptable Use policy, the Student Acceptable Use Policy, and the Online Safety policy;
- Data Protection Policy for Staff;
- CCTV policy;
- Use of Images and Photographs of Students Policy; and
- The school's Archive Policy

3.4 Anyone who works for, or acts on behalf of, the school (including staff, volunteers, governors and other individuals providing a service) should also be aware of and comply with this privacy notice and the Staff Confidentiality Agreement (where applicable).

3.5 If you have any questions about this privacy notice or on how we use your personal data, please contact the Bursar at the school (see 'Contacts' on page 9).

4. PURPOSES FOR WHICH WE PROCESS PERSONAL DATA

4.1 We process a wide range of personal data to support our operations as an independent school. Some of this activity is required to fulfil our legal rights, duties or obligations – including those under a contract with staff, or parents of our students. We also expect that use of personal data will be made in accordance with the school's **'legitimate interests'**, provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data. The following processing is carried out to fulfil our obligations and we also expect these purposes to form our legitimate interests:

- **Selection and admissions of students** (and to confirm the identity of prospective students and their parents) including assessing eligibility for means tested bursary awards.
- **Providing educational services to our students** including the administration of curricular and co-curricular activities, monitoring progress, processing entries for public examinations and other assessments, publishing those results and other student achievements, reporting and storing examination and assessment results, assessing educational needs. Reporting to parents on their child's progress.
- **Providing other services to students** including higher education applications and providing careers advice, administering IT systems in accordance with our Online Safety and Acceptable Use policies, administering school trips, providing resources (library and online), giving and receiving references for current, past and prospective students.
- **Safeguarding our students and providing pastoral support** including recording concerns and incidences of bullying, monitoring use of the internet (and email if required) in accordance with our Online Safety Policy and Acceptable Use policies and keeping records of pastoral support given.
- **Maintaining relationships with alumnae and the wider school community**, including the Parents' Guild, by communicating about school activities and fundraising (please refer to our Development Office Privacy Notice for more information http://spgs.org/privacy-notices).
- **For the purposes of management and operations** such as processing data for planning and research including that required by law (such as tax, diversity or gender pay gap analysis and census returns), to enable relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate (e.g., recording accidents in accordance with our health and safety policies), keeping records for insurance purposes or to obtain appropriate professional advice, keeping financial information to process invoices, fee accounts and manage debtors, compiling information for inspection by the Independent schools Inspectorate, and for commercial operations or other charitable activities.
- **To ensure our premises are secure** including operating CCTV around our site and recording details of our students, staff and visitors, including taking and storing photographic images.
- **For the purposes of fulfilling our duties as an employer** including for the recruitment of staff, volunteers and contractors, conducting appropriate safeguarding checks as required by law, payroll and pension processing, keeping records of other staff matters including that relating to grievances and disciplinaries, and providing and receiving references.
- **Promoting the aims and achievements of the school** through our website, publications, our social media platforms and sometimes in the media. This includes using images (and videos) of our students in accordance with our Taking, Storing and Using Images of Students Policy. We seek your specific consent to share images with our international and partnership schools via the online form on My School Portal.

Special category data

4.2 On occasion we will need to process **special category personal data** (concerning health, ethnicity, religion, biometrics, or sexual life/orientation) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on us by law, including as

regards safeguarding and employment, or from time to time, by explicit consent where required. These reasons will include:

- To safeguard students' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so. For example, for medical advice, for social or public health protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs.
- To provide educational services in the context of any special educational needs of a student.
- To monitor the effectiveness of our equal opportunities policy.
- In connection with employment of our staff. For example, DBS checks, welfare, medical information, union membership or pension plans, biometrics.
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are SEN, health or safeguarding elements.
- For legal and regulatory purposes (for example child protection, diversity monitoring, public health and health and safety) and to comply with our legal obligations and duties of care.

5. TYPES OF PERSONAL DATA PROCESSED BY US

5.1 This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details (including the mobile phone numbers of students, which may be used by key staff in the case of an emergency.)
- car details (about those who use our car parking facilities)
- bank details and other financial information, e.g., about parents who pay fees to the school, to pay staff and other workers, and for the purposes of assessing means tested financial assistance
- past, present and prospective students' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks
- personnel files, including in connection with academic records, employment and safeguarding
- where appropriate, information about individuals' health and welfare, and contact details for their next of kin
- references given or received by the school about students, and relevant information provided by previous educational establishments and/or other professionals or organisations working with students
- correspondence with and concerning staff, students and parents, past and present; and
- images of staff and students (and occasionally other individuals) engaging in school activities, and images captured by the school's CCTV system. If we use a student's name alongside an image, unless we have the student's or parent's specific consent to do otherwise, we will only use their first name and year group and not their surname (or first name and first initial of surname if more than one student with the same first name in that year group). Full names of students may be printed in school publications if not associated to an image of that student.

6. HOW THE SCHOOL COLLECTS DATA

6.1 In most cases the school receives personal data from the individual directly. Parents provide student information when they apply or join the school. Information may be collected via a form, or simply in the ordinary course of day-to-day interaction or communication (such as email, written assessments or by engaging in various activities).

6.2 In some cases, personal data will be supplied by third parties (e.g., another school or employer, or other professionals or authorities working with that individual); or collected from publicly available resources. Please refer to the Development Office Privacy Notice for more information on how we collect data about our alumnae, friends and supporters of the school.

6.3 In accordance with statutory recommendations, we use internet monitoring software for students to monitor access to unsuitable content. We do not routinely monitor email or staff internet use but may do so as part of an investigation. Please refer to our Acceptable Use policies and Online Safety policy http://spgs.org/school-policies

7. WHO HAS ACCESS TO PERSONAL DATA AND WHO WE SHARE IT WITH

7.1 For the most part, personal data collected by us will remain within the school and will be processed by appropriate individuals in accordance with access protocols. Particularly strict rules of access and sharing apply in the context of:

- medical records held and managed by appropriate medical staff, or otherwise in accordance with express consent. The school's medical team may disclose confidential information if it is considered to be in the student's best interest or necessary for the protection of other members of the school community. Images of students with serious medical conditions and allergies may be displayed in appropriate areas of the school, such as staff rooms, and are available on the staff portal; and
- confidential pastoral or safeguarding records are held centrally on CPOMS. Access is tiered according to specific permission levels decided by the Director of Pastoral Care.

7.2 If required, this type of personal data will only be shared on a confidential 'need to know' basis (see below).

7.3 A certain amount of any SEN student's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the student requires.

7.4 The school will need to share personal information relating to its community with third parties, such as:

- professional advisers (e.g., lawyers, insurers, PR advisers and accountants)
- government authorities (e.g., HMRC, DfE, police, the local authority or local health protection team)
- appropriate regulatory bodies e.g., Teaching Regulation Agency (TRA), the Independent Schools Inspectorate, the Charity Commission or the Information Commissioner; and
- companies which organise activities on behalf of the school (e.g., school trip providers).

Data transferred to awarding bodies

7.5 Student personal data will be shared with awarding bodies for the purpose of examining and awarding qualifications. Awarding bodies in turn may be required to provide our students' personal data to educational agencies such as the DfE, Local Authorities and UCAS. This data may also be used for statistical and policy development purposes.

Safeguarding

7.6 Staff, students and parents are reminded that the school is 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 to us, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO or police. For further information about this, please read our Safeguarding (child protection) policy. We keep a record of safeguarding concerns that are reported even if they do not meet the statutory thresholds for reporting on a confidential basis.

Processing by third parties

7.7 Some of our processing activity is carried out on our behalf by third parties such as database providers, web developers and data storage providers. This is subject to contractual assurances that personal data will be kept securely and only in accordance with the school's agreement and/or specific direction. A third party may also pass on, or contract with, a sub-processor. This would only be with our prior authorization, and under a written contract. Please also refer to paragraph 11 below for the transfer of personal data to other countries.

Online Resources and Generative Artificial Intelligence ("Generative AI")

7.8 Before the school requires or recommends that students use an online resource as part of the curriculum, the resource will first be required to go through the school's Online Resources Approval process. This includes data protection checks to ensure that any personal data that is shared with the resource will be adequately protected. In relation to any resources involving Generative AI, it is school policy that staff and students are not permitted to input personal data into the resource. In addition, staff and students must, where it is an option, restrict the extent to which their data is used to train the underlying AI model. In cases where this is not possible via user settings, a full risk assessment must be performed.

8. HOW LONG WE KEEP PERSONAL DATA

8.1 The school will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Further details can be found in the Document Retention Policy.

8.2 If you have any specific queries about how long we keep records or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Bursar at the school (see contact details below). Please bear in mind that we will often have lawful and necessary reasons to hold on to some personal data **even following such request**.

8.3 A reasonable amount of information will be kept, sometimes indefinitely, for the school's historical archive in accordance with the school's Archive Policy.

9. KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

9.1 We will use the contact details of parents, alumnae and other members of the school community to keep them updated about the activities of the school (including fundraising initiatives) and alumnae and parent events of interest, including by sending updates and newsletters by email and by post. Please read the Development Office Privacy Notice Privacy Policy - St Paul's Girls' School (spgs.org) for more information on how we process personal data for these purposes.

10. YOUR RIGHTS

Access

10.1 Individuals have the right to access and understand personal data held about them, and in some cases ask for it to be erased or amended or have it transferred to others, or for the school to stop processing it – but subject to certain exemptions and limitations. If you wish to access or transfer data to another person or organisation, or you have another objection to how your personal data is used, please put your request in writing to the Bursar (see contact details below).

10.2 We will aim to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits which is usually one month in the case of requests for access to information. Fulfilling more complex or multiple requests e.g., those involving third party information may take longer. We will make you aware if that is the case.

10.3 The school 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).

Accuracy

10.4 We will aim to keep information we hold about you up to date and as accurate as possible. You can ask us to erase or correct any out of date, irrelevant or inaccurate information we hold about you (subject to certain limitations and exemptions under Data Protection Law). Please contact the appropriate department at the school if you want to amend your personal information. This will usually be the front office for parents and student personal details, HR for staff personal details and the finance office for financial details.

10.5 You should note that the school will not necessarily delete or amend views, opinions, notes or records purely on the request of an individual who disputes the account, although we may keep a record of all parties' viewpoints.

Requests that cannot be fulfilled

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

10.7 The school is also not required to disclose any student examination scripts (or other information consisting solely of student test answers – although markers' comments may still be disclosable if they constitute personal data); provide examination or other test marks ahead of their ordinary publication date; nor share any confidential reference held by the school that was (or will be) given for the purposes of the education, training, appointment or employment of any individual.

10.8 You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this privacy notice. All such requests will be considered on their own merits.

Student requests

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

10.10 Given we are a secondary school, we expect our students to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home.

Parental requests

10.11 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 students without their consent. The school may consider there are lawful grounds for sharing with or without reference to that student.

10.12 Parents will in general receive educational and pastoral updates about their children in accordance with the Parent Contract.

10.13 All information requests from, on behalf of, or concerning students – whether made under subject access or simply as an incidental request which falls outside the routine provision of information to parents – will therefore be considered on a case-by-case basis.

Consent

10.14 Where the school is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Please refer to either the Parent Contract or the Development Office Privacy Statement as appropriate for details on how to do this. Examples where we do rely on consent are for the use of certain images and certain types of fundraising. Please be aware, however, that the school may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

10.15 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., an employment or parent contract, or a purchase of goods, services or membership).

Whose rights?

10.16 The rights under Data Protection Law belong to the individual to whom the data relates. However, the school will often rely on parental authority for the necessary ways it processes personal data relating to students – for example, under the parent contract, or via a form. Parents and students should be aware that this is not necessarily the same as the school relying on strict consent (see section on Consent above).

10.17 Where consent is required, it will usually be appropriate, given the nature of the processing in question, and the student's age and understanding, to seek the student'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.

10.18 The school will assume that students' consent is not required for ordinary disclosure of their personal data to their parents, e.g., for the purposes of keeping parents informed about the student's activities, progress and behaviour, and in the interests of the student's welfare. That is unless, in the school's opinion, there is a good reason to do otherwise.

10.19 However, where a student seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the school may be under an obligation to maintain confidentiality unless, in the school's opinion, there is a good reason to do otherwise; for example, where the school believes disclosure will be in the best interests of the student or other students, or if required by law.

11. TRANSFER OF PERSONAL DATA TO OTHER COUNTRIES

11.1 We may need to send personal data to other countries (e.g., for school trips or to store your information on cloud-based storage based overseas). The UK has produced 'adequacy regulations' that set out in law certain countries that provide 'adequate' protection for people's rights and freedoms about their personal data. This includes all of the countries within the EEA and all countries, territories and international organisations covered by European Commission adequacy decisions valid as at 31 December 2020.

11.2 If the country that we are sending your information to is not on the list, then it might not have the same level of protection for personal information as there is in the UK. We will take steps to ensure that your privacy rights continue to be protected.

12. THIS POLICY

12.1 We will review and 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.

12.2 Various laws underpin this Privacy Notice and are as follows:

- The UK General Data Protection Regulation (from 1 January 2021)
- The Data Protection Act 2018 and related legislation (from 25 May 2018 and as amended on 1 January 2021)
- The Privacy and Electronic Communications Regulations 2011 (PECR) and the Privacy and Electronic Communications (Amendment) Regulations 2018
- The Protection of Freedoms Act 2012 (biometrics and CCTV)

13. QUERIES AND COMPLAINTS

13.1 Any comments or queries about this policy should be directed to the Bursar, using the contact details below. If you feel unable to contact the Bursar, you should contact the High Mistress. Any complaint will be handled as soon as possible, however if it is received during the school holidays, response times may be longer. A response to a complaint will be given in writing and you may be asked to provide additional details, or to attend a meeting with a senior member of the school. If you remain unsatisfied with the outcome of your complaint, you may refer the matter to the Clerk to the Governors for consideration by a member of the school's governing Board.

13.2 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 organisation before involving the regulator.

14. CONTACTS

St Paul's Girls' School
Brook Green
London
W6 7BS

Bursar:	bursar@spgs.org	
Clerk to the Governors:	bursar@spgs.org	
High Mistress:	hmpa@spgs.org	
ICO:	www.ico.org.uk	Helpline: 0303 123 1113