



## 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 the Senior Master / Mistress (Senior School) or to your form tutor (Prep School/Winterfold).

## 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 ensuring that we know about any pastoral adjustments such as foods that you do not wish to eat. 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 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 in paragraphs 1 to 40 below.

### 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, other pupils 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 on 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. to make sure that we are providing you and other pupils 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 Children's Services. We will also have to disclose your

information to third parties such as the courts, the local authority, the police or other public bodies

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

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 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**, **ESP**, **MP**.

Admissions forms give us lots of personal information about you such as your name, contact details, disabilities, any particular difficulties you have with work, hobbies and interests, medical information (such as information about an allergy) and family circumstances. We get information from you, your parents, your teachers and other pupils. Your old school also gives us information about how well you did and any difficulties you had 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**.
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13. We are legally required to provide the Department for Education with certain information about you and other pupils. Some of this information will be stored on the National Pupil Database. Organisations can request information from the National Pupil Database which includes information about you. But they are only allowed to do this for limited purposes and they must be very careful about how they use your information. More information can be found here - <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information> - LO, SPI.
14. 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, SPI.
15. The School is a charity which means that we may need to share your information with the Charity

25. 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 a pupil is injured at School or if there is a burglary - LI, LO, PI, SPI, LC.
26. 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.
27. If you have misbehaved in a serious way, we may need to share information with the police or other government law-enforcement bodies and we may need to use information about the action taken by the police - LI, LO, PI, SPI, ESP.
28. 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.
29. Parents who are based outside of the UK will sometimes appoint someone to act on their behalf during the admissions process (an overseas agent). If this applies to you, your parents may provide information to the overseas agent so that he or she can pass this on to the School. We will sometimes share information with the overseas agent, for example, we may send them the letter telling your parents that we are offering you a place so that they can pass this on to your parents - LI.
30. We will share your academic and (where fair) your behaviour and pastoral records with your parents or education guardian so they can support your schooling - LI, PI, SPI.
31. 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 other pupils are not misbehaving, are not 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 the Senior Master / Mistress or your form tutor - LI, PI, SPI.
32. We will record your name, boarding or day status, your House and if you have been awarded a

35. 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](#).
36. When you leave the School, we will transfer your personal details onto the InTouch Bromsgrovians Connected Alumni Database, which is operated by the School. Alumni are then offered the opportunity to logon and use the various functions should they so wish. This is so we can stay in touch with you but we won't pass your information on to any third parties unless we have a good reason for doing so. If you would prefer that we do not put your details on the database please contact the Bursar - [LI](#)
37. When you leave the School, we may include your personal details in the leavers' book which includes leavers' photographs. Your name may also be included on leavers' clothing - [LI](#).
38. The School must make sure that our computer network d5/F5 11.04 Tf1 0 0 1 92.664 590.38 Tm0 g0 G(The )-2(So





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:

- o we are using it for direct marketing purposes (e.g. to send you the School newsletter);
- o 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;
- o 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.

The Bursar 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.

Please speak to the Senior Master/Mistress or your form tutor 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 the Senior Master / Mistress or your form tutor to speak to the Bursar or speak to 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](http://ico.org.uk).