



RADLEY

Privacy Statement

January 2024

Radley College Privacy Statement

This statement

This statement provides information about how the school will use (or "process") personal data about individuals including current, past and prospective pupils, their parents, carers or guardians (referred to in this policy as "parents"), and other friends and supporters of the College.

It applies in addition to the school's Terms and Conditions, and any other information the school may provide about a particular use of personal data, including e.g. the school's policy on taking, storing and using images of children.

Anyone who works for, or acts on behalf of, the school (including staff, volunteers, members of Council and service providers) should also be aware of and comply with the school's Data Processing Procedures for staff, which also provides further information about how personal data about those individuals will be used.

Responsibility for data protection

General Data Protection Regulation (GDPR) (adopted 2016), has been enforceable since 25 May 2018 and replaced previous legislation such as the Data Protection Act (DPA 1998). In accordance with the requirements of GDPR the school has notified the Information Commissioner's Office ("ICO") of its processing activities. The school's ICO registration number is Z7445411 and its registered address is Radley College, Radley, Oxfordshire, OX14 2HR.

Legal basis for processing data

Except where stated otherwise, the school processes personal data on the grounds of legitimate interests. The ICO website states the following, "It is likely to be most appropriate where you use people's data in ways they would reasonably expect and which have a minimal privacy impact."

Types of personal data processed by the school

In order to carry out its ordinary duties to staff, pupils and parents, the school may process and will hold securely a wide range of personal data about individuals. This includes current, past and prospective staff and pupils and their parents as part of its operation, including by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details;
- financial and bank details - for staff for payroll purposes and parents who pay fees to the school
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- personnel files for past, present and prospective staff;
- where appropriate, information about individuals' health, and contact details for their next of kin;
- references given or received by the school about staff and pupils, and information provided by previous educational establishments and/or other professionals or organisations working with staff and pupils; and

- images of staff and pupils (and other individuals) engaging in school activities, and images captured by the school's CCTV system.

Generally, the school receives personal data from the individual directly (or, in the case of pupils, from parents). However, in some cases, personal data 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.

The school may, from time to time, need to process "sensitive personal data" regarding individuals. Sensitive personal data includes information about an individual's physical or mental health, race or ethnic origin, religious belief or criminal records and proceedings. Sensitive personal data is entitled to special protection under the Act, and will only be processed by the school with the explicit consent of the appropriate individual, or as otherwise permitted by the Act.

Use of personal data by the school

The school will use (and where appropriate share with third parties) personal data about individuals for a number of purposes as part of its operations, including as follows:

- Professional advisers (eg lawyers, insurers, PR advisers and accountants);
- Appropriate regulatory bodies (eg the Independent Schools Inspectorate, Charity Commission or the Information Commissioner);
- For the purposes of pupil selection and to confirm the identity of prospective pupils and their parents;
- To provide education services (including SEN), career services, and extra-curricular activities to pupils; monitoring pupils' progress and educational needs; and maintaining relationships with alumni and the school community;
- For the purposes of management planning and forecasting, research and statistical analysis, and to enable the relevant authorities to monitor the school's performance;
- To give and receive information and references about past, current and prospective staff and 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 (and where necessary, medical) care, and to take appropriate action in the event of an emergency or accident, specifically by disclosing details of an individual's medical condition where it is in the individual's interests to do so, for example for medical advice, insurance purposes or to organisers of school trips;
- To monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's Use of IT Policy;
- To make use of photographic images of staff and pupils in school publications, on the school website, in accordance with the school's policy on taking, storing and using images of children;
- For security purposes, and for regulatory and legal purposes (for example Safeguarding and Health & Safety) and to comply with its legal obligations;
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

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

- Medical records; and
- Pastoral or safeguarding files.

Staff, pupils and parents are reminded that the school is under duties imposed by law and statutory guidance (including KCSIE) to record or report incidents and concerns that arise or are reported to it, if they meet a certain threshold of seriousness in their nature or regularity.

How long we keep personal data

The school will retain personal data securely and 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 ordinary staff and pupil personnel files is up to 7 years following departure from the school. However incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Bursar. However, please bear in mind that the school will often have lawful and necessary reasons to hold on to some personal data even following such a request.

A limited and reasonable amount of information will be kept for archiving purposes 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 the school

The school will use the contact details it has been given of staff, parents, alumni and other members of the school community to keep them updated about the activities of the school, including by sending updates and newsletters by email and by post, and by making contact by telephone.

The school records Radleian Society and The Radley Foundation data on its Raiser's Edge NXT database, which is provided by the supplier Blackbaud. The data is hosted within the European Union, including replication a secondary location for redundancy.

Unless the relevant individual objects and informs the school of this in writing, the school may also:

- Share personal data about staff, parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the school community. For example, Clubs or Societies setup by the school.
- Contact parents and/or alumni (including via the organisations above) by post and email in order to promote and raise funds for the school.

- Use in-house research techniques and specialist third parties to ensure communications are relevant and timely, and to provide an improved experience for our community. Research allows us to target our resources effectively. By understanding the background and interests of the people who support us or may wish to support us, we can make appropriate requests. This is something our donors tell us is important to them. Our research may use information from third party sources which is in the public domain. Importantly, our research enables us to raise more funds, sooner, and more cost-effectively, and to service the interests of our donors and prospective donors appropriately, than we otherwise could.

Should you wish to limit or object to any such use, or would like further information, please contact the Development Director:

The Foundation Office
Radley College
Radley
Oxfordshire
OX14 2HR

foundation@radley.org.uk

Whose rights

The rights under the Act belong to the individual to whom the data relates. However, the school will in most cases rely on parental consent to process personal data relating to pupils (if consent is required under the Act) unless, given the nature of the processing in question, and the pupil's age and understanding, it is more appropriate to rely on the pupil's consent. Parents should be aware that in such situations they may not be consulted.

In general, the school will assume that pupils consent to disclosure of their personal data 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, unless, in the school's 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 data being disclosed to their parents, the school will 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 pupil or other pupils.

Pupils are required to respect the personal data and privacy of others and to comply with the school's Use of IT Policy and the School Rules.

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the school. Staff should be aware that the right of access is limited to their own personal data, and certain data is exempt from the right of access.

Data accuracy

The school will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. 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 erased or corrected (subject to certain exemptions and limitations under the Act) and may do so by contacting the school in writing. The school endeavours to address requests received within 30 days during normal school working hours.

Data Security

The school will take appropriate technical and organisational steps to endeavour to ensure the security of personal data it holds about individuals. All staff will be made aware of this Policy and their duties under the Act.

Queries and Complaints

Any comments or queries on this Policy should be directed in writing using the following contact details:

The Bursar
Radley College
Radley
Oxfordshire
OX14 2HR

If an individual believes that the school has not complied with this Policy or acted otherwise than in accordance with the Act, they should also notify the Bursar.