

CASTLE SCHOOL

PRIVACY NOTICE

1. INTRODUCTION

Castle School is an independent School located at Sodston Manor, Narberth, Pembrokeshire, SA67 8HB. We take our responsibilities as a data controller seriously and are committed to using the personal data we hold in accordance with the law.

This privacy notice provides detailed information about how we process personal data. Please read it carefully and, if you have questions regarding your personal data or its use, please contact the Compliance Coordinator via email learn@castleschoolpembrokeshire.co.uk or by post at the aforementioned address.

2. TYPES OF PERSONAL DATA WE PROCESS

We process personal data about prospective, current and past: students and their parents; staff, suppliers and contractors; friends and supporters; and other individuals connected to or visiting the School (including students enrolled on our connected courses).

The personal data we process takes different forms – it may be factual information, expressions of opinion, images or other recorded information which identifies or relates to a living individual. Examples include:

- o names, addresses, telephone numbers, e-mail addresses and other contact details;
- o family details and nationality
- o admissions, academic, disciplinary and other education related records, information about special educational needs, examination scripts and marks;
- o previous school(s) information, including references and assessment data;
- o where appropriate, medical/health information;
- o education and employment data;
- o images, audio and video recordings;
- o financial information (eg for bursary assessment or for fund-raising);
- o courses, meetings or events attended.

As a school, we need to process special category personal data (eg concerning health, ethnicity or religion) and criminal records information about some individuals (particularly students and staff). We do so in accordance with applicable law (including with respect to safeguarding or employment) or by explicit consent.

3. COLLECTING, HANDLING AND SHARING PERSONAL DATA

We collect most of the personal data we process directly from the individual concerned (or in the case of students, from their parents). In some cases, we collect data from third parties (for example, referees, previous schools, the Disclosure and Barring Service, or professionals or authorities working with the individual) or from publicly available resources.

Personal data held by us is processed by appropriate members of staff for the purposes for which the data was provided. We take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. We do not transfer personal data outside of the European Economic Area unless we are satisfied that the personal data will be afforded an equivalent level of protection.

In the course of school business, we share personal data (including special category personal data where appropriate) with third parties such as examination boards, the school doctors, the school's professional advisors and relevant authorities (eg the Local Children Safeguarding Board, DBS, NCTL, UK Visas and Immigration, HM Revenue and Customs, Department for Education and Department for Work and Pensions). Some of our systems are provided by third parties, eg hosted databases, school website, school calendar, and school portal providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions.

4. PURPOSES FOR WHICH WE PROCESS PERSONAL DATA

We process personal data to support the School's operation as an independent boarding and prep school for, and in particular for:

- o The selection and admission of students;
- o The provision of education to students including the administration of the school curriculum and timetable; monitoring student progress and educational needs; reporting on the same internally and to parents; administration of students' entries to public examinations, reporting upon and publishing the results; providing references for students (including after a student has left);
- o The provision of educational support and related services to students (and parents) including the maintenance of discipline; provision of careers and library services; administration of sports fixtures and teams, school trips; provision of the school's IT and communications systems all in accordance with our IT policies;
- o The safeguarding of students' welfare and provision of pastoral care, welfare and health care services by school staff;
- o Compliance with legislation and regulation including the preparation of information for inspections by the Independent Schools Inspectorate and Estyn, submission of annual census information to each of the Independent Schools Council and Department for Education;
- o Operational management including the compilation of student records; the administration of invoices, fees and accounts; the management of the School's property; the management of security and safety arrangements (including monitoring of the school's IT and communications systems in accordance with our IT Policy); management planning and forecasting; research and statistical analysis; the administration and implementation of the School's rules and policies for students and staff; the maintenance of historic archives and other operational purposes;
- o Staff administration including the recruitment of staff/ engagement of contractors (including compliance with DBS procedures); administration of

- payroll, pensions and sick leave; review and appraisal of staff performance; conduct of any grievance, capability or disciplinary procedures; and the maintenance of appropriate human resources records for current and former staff; and providing references;
- o The promotion of the School through its own websites, the prospectus and other publications and communications (including through our social media channels); and
- o Maintaining relationships with the wider school community by communicating with the body of current and former students and/or their parents or guardians and organising events.

The processing set out above is carried out to fulfill our legal obligations (including those under our parent contract, staff employment contracts and as set out in the GDPR and UK law). We also expect these purposes to form our legitimate interests.

5. KEEPING IN TOUCH

We keep in touch with current or former parents or other members of the school community. We will use your contact details to keep you updated about our activities and invite you to events of interest by email and by post. We ask you to let us know your data preferences so that we can ensure our communications are relevant to you.

6. HOW LONG WE KEEP PERSONAL DATA

We retain personal data only for a legitimate and lawful reason and only for so long as necessary or required by law. We have adopted Records Retention Guidelines which set out the time period for which different categories of data are kept. If you have any specific queries about our record retention periods, or wish to request that your personal data is considered for erasure, please contact the Compliance Administrator via email learn@castleschoolpembrokeshire.co.uk

7. YOUR RIGHTS

You have various rights under Data Protection Law to access and understand the personal data we hold about you, and in some cases to ask for it to be erased or amended or for us to stop processing it, but subject to certain exemptions and limitations.

You always have the right to withdraw consent, where given, or otherwise object to receiving generic communications. Please be aware however that the school may have another lawful reason to process the personal data in question even without your consent. That reason will usually have been asserted under this Privacy Notice, or may exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because of a purchase of goods or services).

If you would like to access or amend your personal data, or have some other objection to how your personal data is used, please make your request in writing to the Compliance Administrator at learn@castleschoolpembrokeshire.co.uk.

We will 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 is manifestly excessive or similar to previous requests, we may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows it.

You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal privilege. We are also not required to disclose any student examination scripts (though examiners' comments may fall to be disclosed), nor any confidential reference given by the school for the purposes of the education, training or employment of any individual.

8. STUDENT DATA

The rights under Data Protection legislation belong to the individual to whom the data relates. However, we will often rely on parental consent to process personal data relating to students (if consent is required) unless, given the nature of the processing in question, and the student's age and understanding, it is more appropriate to rely on 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.

In general, we 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, unless, in the school's opinion, there is a good reason to do otherwise.

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, we may be under an obligation to maintain confidentiality unless, in our 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 is required by law.

Students can make subject access requests for their own personal data, provided that they have sufficient maturity to understand the request they are making. Our Senior School students are generally assumed to have this level of maturity. A person with parental responsibility will generally be entitled to make a subject access request on behalf of students, but the information in question is always considered to be the child's at law. A student of any age may ask a parent or other representative to make a subject access request on their behalf. Moreover (if of sufficient maturity) their consent or authority may need to be sought by the parent making such a request.

We may need to share special category data (medical for instance), in order to safeguard students' vital interest and welfare, to provide appropriate pastoral 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 where it is in the individual's vital interests to do so.

9. FEES

We may make enquiries of pupils' previous schools for confirmation that all sums due and owing to such schools have been paid. We may also inform other schools or educational establishments to which pupils are to be transferred if any of our fees are unpaid.

10. CHANGE OF DETAILS

We try to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Please notify learn@castleschoolpembrokeshire.co.uk of any significant changes to important information, such as contact details, held about you.

11. THIS POLICY

Our privacy notice should be read in conjunction with our other policies and terms and conditions which make reference to personal data, including our Parent Contract, our Safeguarding Policy, Health and Safety Policies and IT Policies.

We will update this Privacy Notice from time to time. Any substantial changes that affect how we process your personal data will be notified on our website and to you directly, as far as practicable.

Print Name

Signed

Date