

PRIVACY NOTICE AND ANNEXES

For the purposes of this notice Austin Friars ("the School") is the "data controller" of personal data ("personal data"). "The School" refers to both Austin Friars (charity number 516289) and Austin Friars Development Fund (charity number 526867).

This notice is intended to provide information about how the School will use (or "process") personal data about individuals including, its staff, its current, past and prospective pupils and their parents, carers or guardians (referred to in this notice as 'parents').

This information is provided because Data Protection Law includes rules on giving privacy information to those individuals whose data is held by an organisation. The information provided to data subjects about how the School processes their personal data must be:

- Concise, transparent, intelligible and easily accessible;
 - Written in clear and plain language; and
- Free of charge.

This privacy notice deals with the overall privacy responsibilities of the School but includes, as Annexes, the particular notices that apply to:-

- Annex A Parents (carers or guardians) or children of the School, or applying to join the School
- Annex B - Pupils over the age of 13.
- Annex C - Trustees of the School.
- Annex D - Alumni.
- Annex E - Employees of the School, or applying to join the School

The appropriate Annex should be read along with this over-arching notice.

The Privacy Notice applies alongside any other information the School may provide about a particular use of personal data, for example when collecting data via an online or paper form.

Each Annex deals with two sources of data, that obtained directly from the subject and data not obtained directly from the subject.

RESPONSIBILITY FOR DATA PROTECTION

The School has appointed the Bursar as Privacy and Compliance Officer who will deal with all requests and enquiries concerning the School's use of personal data and endeavour to ensure that all personal data is processed in compliance with this notice and Data Protection Law. The Bursar's contact details are office@austinfriars.co.uk, Telephone number 01228 528042, Austin Friars, Etterby Scaur Carlisle, CA3 9PB

D L Strawbridge
Bursar

5th April 2023

Last Reviewed and endorsed by Full Trustees Meeting on: 9th June 2023

Updated April 2023

Next Review by Trustees: Summer Term 2024

Privacy Notice Austin Friars – parents (carers or guardians) of children at the School, or applying to join the School and applies to all data held in respect of both pupils and their parents (carers or guardians)

This annex should be read in conjunction with the introductory paragraphs in the covering document.

What personal information does the School collect and process

Personal data that the School may collect, store and use about you includes, but is not restricted to:

- Personal information (such as names, unique candidate identifiers, addresses, telephone numbers, e-mail addresses and other contact details).
- Car details (about those who use our car park facilities).
- Bank details and other financial information.
- Past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any needs) and assessment information (including examination scripts and marks).
- Special Educational Needs Information.
- Where appropriate, information about individuals' health and welfare, including contact details for next of kin.
- References given or received by the School about pupils and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils.
- Correspondence with and concerning pupils, 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).
- Characteristics (such as ethnicity, religious beliefs, language, nationality, country of birth and free school meal eligibility).
- Post 16 learning information.

Why the School needs to process and collect personal data

Data will be processed for the purposes of responding to requests for information about joining the School and once a pupil joins the School to fulfil its legal rights, duties or obligations. The data the School holds will be the minimum it requires to form and maintain the contract between you and the School.

The School will only collect and your personal data when the law allows us to. Most commonly, we will use your personal data:

- When performing our contract with the pupil and their parent(s) to provide education
- When complying with a legal obligation
- By obtaining your consent to use personal data in a certain way

Other uses of personal data will be made in accordance with the School's legitimate interests or the legitimate interests of another, provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data.

The School expects that the following uses of personal data will fall within that 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.
- To support pupils' teaching and learning and to monitor and report on pupil progress and educational needs.
- To enable the relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate.
- To give and receive information and references about a past, current or prospective pupil including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended and to provide references requested by an employer or potential employer to whom past pupils have applied.
- To enable pupils to take part in national and other assessments and to publish examination results or other achievements of pupils in the School.
- To safeguard pupils' welfare and provide appropriate pastoral care.
- To monitor (as appropriate) use of the School's IT and communication systems in accordance with the School Rules, and ICT Acceptable Use Policy.
- To make use of photographic images of pupils in School publications, on the School website and (where appropriate) on the School's social media channels in accordance with the School's policy of taking, storing and using images of children and the School's media consent form.
- For security purposes including CCTV in accordance with the School's CCTV policy.
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process.
- Where otherwise reasonably necessary for the operation of the School, including to obtain appropriate professional advice and insurance.
- To secure funding for the School and, where relevant, individual pupils.
- Where specifically requested by pupils and/or their parents or guardians.

In addition, the School will, on occasion, need to process **special category personal data** (concerning health, ethnicity or religion) in accordance with rights or duties imposed on it by law, including as regards safeguarding, or from time to time by explicit consent where required. These reasons will include:

- To safeguard pupils' and staff 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 protection, safeguarding and co-operation 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 pupil.
- To provide spiritual education in the context of any religious beliefs.
- 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 and health and safety) and to comply with its legal obligations and duties of care.

How the School collects data

Generally, the School collect personal data directly from you. This may be via a form, or simply in the ordinary course of interaction or communication.

In some cases personal data will be supplied by third parties (for example another School or other professionals or authorities working with that individual) or collected from publicly available resources, for example financial information including credit references may be processed in order to verify identity and to assess applications from parents or guardians for the award of a bursary. The School may search the files of any licensed credit reference agency who will keep a record of that search and details about the application. This record will be seen by other organisations which make searches about individuals. Failure to supply information to enable us to carry out a search may result in the refusal of an award.

Where it is mandatory to collect information from you, we will explain the possible consequences of not complying.

With whom does the School share your data with

The School may share your data with the following third parties who have contracts with the School and who have equalled the School's precautions and systems for dealing with data, these are:

- Appropriate contractors (for example caterers, visiting music teachers, photographers)
- Professional advisers (eg lawyers, insurers and accountants, health care service providers);
- Government authorities (eg, HMRC, DfE, police, the local authority, UK visas and immigration)
- Appropriate regulatory bodies (eg the Independent Schools Inspectorate, the Charity Commission, the Information Commissioner, the Cumbria Safeguarding Children Partnership - CSCP).
- Feeder schools and educational establishments that pupil's and staff attend before/after
- Travel companies / External activity providers
- Examination Boards

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 (i.e. on a need to know basis). Particularly strict rules of access apply in the context of;

- Medical records
- Pastoral or safeguarding files

However, a certain amount of SEN 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.

It is not necessary for data to be shared with other countries outside of the UK. The exception to this will be international trips that the School organises, should this be envisaged for your child, you will be contacted for your consent, the consent will be limited in time and content if it is required.

How is the data kept securely and for how long is it retained

The School has put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

The retention period for pupil data will be until the pupil reaches the age of 25, and/or be modified by any other legal obligation the School finds itself under, however, a 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 that fact in order to fulfil your wishes (called a “suppression record”)

Your rights in relation to your personal data

Under data protection law, individuals have certain rights regarding how their personal data is used, including the right to:

- Withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.
- Request access to your personal data to verify the lawfulness of the processing the School is carrying out
- Request correction of your personal data if it is inaccurate, incomplete or out of date
- To request deletion of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data

If you wish to exercise any of the rights above, please contact the School Bursar.

Complaints

You can complain at any time about how the School has handled your data, directly to the School Bursar.

Should you feel your complaint has not been resolved to your satisfaction you can make a complaint to the Information Commissioners Office as follows:

- Call the ICO helpline on 0303 123 1113.
- Report a concern online at <https://ico.org.uk/concerns/>
- By writing to: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Privacy Notice Austin Friars – Children at the School over the age of 13.

This annex should be read with the introductory paragraphs in the covering document.

What personal information does the School collect and process

Personal data that the School may collect, store and use about you includes, but is not restricted to:

- Personal information (such as name, unique candidate identifier, addresses, telephone numbers, e-mail addresses and other contact details).
- Car details (about those who use our car park facilities).
- Past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any needs) and assessment information (including examination scripts and marks).
- Special Educational Needs Information.
- Where appropriate, information about individuals' health and welfare, including contact details for next of kin.
- References given or received by the School about pupils and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils.
- Correspondence with and concerning pupils 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).
- Characteristics (such as ethnicity, religious beliefs, language, nationality, country of birth and free school meal eligibility).
- Post 16 learning information

Why the School needs to process and collect personal data

Data will be processed for the purposes of allowing you to make the best of your time at Austin Friars. The data the School holds will be the minimum it requires to allow you to thrive in your years here.

The School will only collect and your personal data when the law allows us to. Most commonly, we will use your personal data:

- When performing our contract with the pupil and their parent(s) to provide education
- When complying with a legal obligation
- By obtaining your consent to use personal data in a certain way

Other uses of personal data will be made in accordance with the School's legitimate interests or the legitimate interests of another, provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data.

The School expects that the following uses will fall within that 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.
- To support pupils' teaching and learning and to monitor and report on pupil progress and educational needs.
- To enable the relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate.
- To give and receive information and references about a past, current or prospective pupil including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended and to provide references requested by another educational establishment or employer to whom past pupils have applied.
- To enable pupils to take part in national and other assessments and to publish examination results or other achievements of pupils in the School.
- To safeguard pupils welfare and provide appropriate pastoral care.
- To monitor (as appropriate) use of the School's IT and communication systems in accordance with the School Rules, and ICT Acceptable Use Policy.
- To make use of photographic images of pupils in School publications, on the School website and (where appropriate) on the School's social media channels in accordance with the School's policy of taking, storing and using images of children and the School's media consent form.
- For security purposes including CCTV in accordance with the School's CCTV policy.
- To carry out or cooperate with any School or external complaints, disciplinary or investigation process.
- Where otherwise reasonably necessary for the operation of the School, including to obtain appropriate professional advice and insurance.
- To assess the quality of services provided and how well the School as a whole is doing.
- To secure funding for the School and where relevant individual pupils.
- Where specifically requested by pupils and/or their parents or guardians.
- To facilitate and support the School's career programme, in conjunction with the Austin Friars Former Pupil Association ran through the School's Development Office, which keeps details of Current and Former Parents, and alumni, on record.

In addition, the School will, on occasion, need to process **special category personal data** (concerning health, ethnicity or religion) in accordance with rights or duties imposed on it by law, including as regards safeguarding, or from time to time by explicit consent where required. These reasons will include:

- To safeguard pupils' and staff 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 protection, safeguarding and co-operation 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 pupil.
- To provide spiritual education in the context of any religious beliefs.
- 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 and health and safety) and to comply with its legal obligations and duties of care.

How the School collects data

Generally, the School collect personal data directly from the you. This may be via a form, or simply in the ordinary course of interaction or communication.

In some cases personal data will be supplied by third parties (for example another School or other professionals or authorities working with that individual) or collected from publicly available resources.

Where it is mandatory to collect information from you, we will explain the possible consequences of not complying.

With whom does the School share your data with

The School will share your data with the following companies who have contracts with the School and who have equalled the School's precautions and systems for dealing with data, these are:

- Caterers
- Photographers
- Health care service providers
- IT Contractors
- IT software providers
- Professional advisers (eg lawyers, insurers and accountants);
- Government authorities (eg, HMRC, DfE, police, the local authority, UK visas and immigration)
- Appropriate regulatory bodies (eg the Independent Schools Inspectorate, the Charity Commission, the Information Commissioner, the Cumbria Safeguarding Children Partnership - CSCP).
- Feeder schools and educational establishments that pupil's and staff attend after leaving us
- Travel companies / External activity providers
- Examination Boards

For the most part personal data collected by the School will remain within the School and will be processed by only those individuals given access (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 first aid staff and
- Pastoral or safeguarding files

However, a certain amount of SEN relevant information will need to be provided to staff more widely in the context of providing the necessary care and education you may require.

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the School organises, should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it is required.

How is the data kept securely and for how long is it retained

The School has put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limited access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

The retention period for pupil data will be until you reach the age of 25, (and/or be modified by any other legal obligation the School finds itself under). However, a 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 that fact in order to fulfil your wishes (called a “suppression record”)

Your rights in relation to your personal data

Under data protection law, individuals have certain rights regarding how their personal data is used, including the right to:

- Withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.
- Request access to your personal data to verify the lawfulness of the processing the School is carrying out
- Request correction of your personal data if it is inaccurate, incomplete or out of date
- To request deletion of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data

If you wish to exercise any of the rights above, please contact the School Bursar.

Complaints

You can complain at any time about how the School has handled your data, directly to the School Bursar.

Should you feel your complaint has not been resolved to your satisfaction you can make a complaint to the Information Commissioners Office as follows:

- Call the ICO helpline on 0303 123 1113.
- Report a concern online at <https://ico.org.uk/concerns/>
- By writing to: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Privacy Notice Austin Friars – Trustees of the School.

This annex should be read in conjunction with the introductory paragraphs in the covering document.

What personal information does the School collect and process

Personal data that the School may collect, store and use about you includes, but is not restricted to:

- Personal information (such as names, addresses, telephone numbers, e-mail addresses and other contact details).
- Car details (about those who use our car park facilities).
- Where appropriate, information about individuals' health and welfare, including contact details for next of kin.

Why the School needs to process and collect personal data

Data will be processed for the purposes of responding to requests for information about joining the Board of the School. The data the School holds will be the minimum it requires.

The School will only collect and your personal data when the law allows us to. Most commonly, we will use your personal data:

- When complying with a legal obligation
- By obtaining your consent to use personal data in a certain way

Other uses 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 School expects that the following uses will fall within that category of "**legitimate interests**".

- For the purpose of appointment to confirm the identity of prospective Trustees.
- To monitor (as appropriate) use of the School's IT and communication systems in accordance with the School Rules, and ICT Acceptable Use Policy.
- For security purposes, including CCTV in accordance with the School's CCTV policy.
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process.
- Where otherwise reasonably necessary for the operation of the School, including to obtain appropriate professional advice and insurance.

How the School collects data

Generally, the School collect personal data directly from the you. This may be via a form, or simply in the ordinary course of interaction or communication.

In some cases personal data will be supplied by third parties (for example another School or other professionals or authorities working with that individual) or collected from publicly available resources.

Where it is mandatory to collect information from you, we will explain the possible consequences of not complying.

With whom does the School share your data with

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 (i.e. on a 'need to know' basis). However, some functions may be outsourced.

The School will share your data with the following companies who have contracts with the School and who have equalled the School's precautions, systems and procedures for dealing with data, these are:

- Photographers
- IT Contractors
- IT software providers
- Professional advisers (eg lawyers, insurers and accountants);
- Travel companies / External activity providers
- Government authorities (eg, DfE, police or the local authority)
- Appropriate regulatory bodies (eg the Independent Schools Inspectorate, the Charity Commission, the Information Commissioner, the Cumbria Safeguarding Children Partnership - CSCP and Companies House).

As a charity/not-for-profit school that needs to raise money, we undertake in-house prospect research about potential donors and from time to time engage specialist agencies to gather information about you from publicly available sources. These sources would include, for example, Companies House, the Electoral Register, company websites, 'rich lists', social networks such as LinkedIn, political and property registers and news archives.

Once we have collected this public information, we may choose to save relevant information such as your education and career history on our secure internal database. This helps with our fundraising approaches, enables us to offer careers and mentoring to students and alumni, helps us find speakers and gives us the opportunity to create communities of interest with our School Community.

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the School organises, should this be envisaged for you, you may be contacted for your consent, the consent will be limited in time and content if it is required.

In accordance with Data Protection Law, this type of external data processing is always subject to contractual assurances that personal data will be kept securely and used only in accordance with the school's specific directions.

How is the data kept securely and for how long is it retained

The School has put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limited access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

The retention period for data on Trustees will be unlimited as long as the School believes it has a relationship to serve with the Trustees.

Your rights in relation to your personal data

Under data protection law, individuals have certain rights regarding how their personal data is used, including the right to:

- Withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.
- Request access to your personal data to verify the lawfulness of the processing the School is carrying out
- Request correction of your personal data if it is inaccurate, incomplete or out of date
- To request deletion of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data

If you wish to exercise any of the rights above, please contact the School Bursar.

Complaints

You can complain at any time about how the School has handled your data, directly to the School Bursar.

Should you feel your complaint has not been resolved to your satisfaction you can make a complaint to the Information Commissioners Office as follows:

- Call the ICO helpline on 0303 123 1113.
- Report a concern online at <https://ico.org.uk/concerns/>
- By writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Privacy Notice Austin Friars – Alumni

This annex should be read in conjunction with the introductory paragraphs in the covering document.

What personal information does the School collect and process

Personal data that the School may collect, store and use about you includes, but is not restricted to:

- Personal information (such as names, addresses, telephone numbers, e-mail addresses and other contact details);
- Past pupils' academic and assessment information (including examination scripts and marks).
- References given or received by the School about pupils and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- Correspondence with and concerning pupils and parents, past and present;
- the dates when you or your child attended the School (if applicable);
- if you are a former staff member the dates when you worked with us;
- your contact details;
- information about your achievements and interests e.g. the sports teams you were part of as a pupil;
- where you attended university and your occupation (if applicable);
- your communications preferences;
- records of any donations;
- your Gift Aid status if applicable;
- information from articles in the media;
- any dietary requirements for catering purposes that you have provided; and
- any disability you may have so that we may make reasonable adjustments for you.

Why the School needs to process and collect personal data

Data will be processed for the following purposes of, but not restricted to:

- maintaining an accurate record of those who were educated at Austin Friars.
- keeping you informed about School and Former Pupil events and activities and in relation to your attendance at those events;
- facilitating interaction between members of the School community.
- telling you about products sold to benefit the School such as clothing and sports goods;
- keeping you informed about what is happening at the School, for example, by sending you newsletters, a copy of the School magazine (Caritas) or details of Former Pupil events
- providing financial support to the School. This includes, for example, bursaries, capital projects and the annual fund; and
- informing you of other ways in which you might support the School (such as when you volunteer).
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests;

Unless the relevant individual objects, the School will also:

- Give and receive information and references about a past, current or prospective pupil including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended and to provide references requested by another educational establishment or employer to whom past pupils have applied.
- Facilitate and support the School's career programme, in conjunction with the Austin Friars Development Fund ran through the School's Development Office, which keeps details of current and former parents, and alumni, on record.
- For security purposes, including CCTV, in accordance with the School's CCTV policy

We will contact you for the above purposes by email, telephone, post and by text message but we will only do collect and retain your personal data when the law allows us to. We will rely on your consent use your personal information. If you tell us that you do not want to be contacted for any of these purposes, then we will of course respect that.

We will take photographs or videos of parents and alumni to use in our publicity or on our social media platforms and website. If we consider that the photograph or video is more privacy intrusive then we may ask for consent first.

How the School collects data

Generally, the School collect personal data directly from the you. This may be via a form, or simply in the ordinary course of interaction or communication.

We may also use information from public sources to find out more about you. For example, we may use the information about you on your employer's website to find out more if we were thinking of inviting you to talk at a careers evening.

If you wish to make a donation, particularly a donation of a substantial value, we may need to verify your identity and/or carry out financial due diligence on you. This may involve taking and retaining copies of your identification documents and obtaining your personal information from sources including those set out in the paragraph above. This is to comply with our legal obligations.

In some cases personal data will be supplied or shared with third parties (for example another School or other professionals or authorities working with that individual) or collected from publicly available resources. Such cases may included, but not limited to:

- If you use a third-party platform to donate, then we will receive information about you from them.
- If you attend one of our events, then we will share your information with event booking platforms
- 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.
- On occasion, we may need to share information with the police for the prevention and investigation of crime and the prosecution of offenders.
- We may also need to share information with our legal advisers for the purpose of obtaining legal advice.
- We will need to share information if there is an emergency, for example, if you are hurt whilst on school premises or at one of our events.

- We are assisted by a small team of volunteers (which includes former pupils, trustees, and current parents) but we will not share your contact details with them, or any other information which we consider to be confidential without your permission.
- We use contractors to help us with our work (e.g., a printing company for our literature) or where we store our database in the cloud. We also use third parties to send out communications on our behalf.
- We may also use trusted third-party providers to help us learn more about you through prospect research.

Where it is mandatory to collect information from you, we will explain the possible consequences of not complying.

With whom does the School share your data with

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 (i.e. on a 'need to know' basis). However, some functions may be outsourced.

As a charity/not-for-profit school that needs to raise money, we undertake in-house prospect research about potential donors and from time to time engage specialist agencies to gather information about you from publicly available sources. These sources would include, for example, Companies House, the Electoral Register, company websites, 'rich lists', social networks such as LinkedIn, political and property registers and news archives. Once we have collected this public information, we may choose to save relevant information such as your education and career history on our secure internal database. This helps with our fundraising approaches, enables us to offer careers and mentoring to students and alumni, helps us find speakers and gives us the opportunity to create communities of interest with our alumni.

In accordance with Data Protection Law, this type of external data processing is always subject to contractual assurances that personal data will be kept securely and used only in accordance with the school's specific directions.

How is the data kept securely and for how long is it retained

The School has put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limited access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

The retention period for alumni data will be unlimited as long as the School believes it has a relationship to serve with the alumnus.

Your rights in relation to your personal data

Under data protection law, individuals have certain rights regarding how their personal data is used, including the right to:

- Withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.
- Request access to your personal data to verify the lawfulness of the processing the School is carrying out
- Request correction of your personal data if it is inaccurate, incomplete or out of date
- To request deletion of your personal data
- Object to processing of your personal data
- Request restriction of processing your personal data
- Request transfer of your personal data

If you wish to exercise any of the rights above, please contact the School Bursar.

Complaints

You can complain at any time about how the School has handled your data, directly to the School Bursar.

Should you feel your complaint has not been resolved to your satisfaction you can make a complaint to the Information Commissioners Office as follows:

- Call the ICO helpline on 0303 123 1113.
- Report a concern online at <https://ico.org.uk/concerns/>
- By writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Privacy Notice Austin Friars – employees of the School, or applying to join the School

This annex should be read in conjunction with the introductory paragraphs in the covering document.

What types of personal information does the School collect and process

Personal data that the School may collect, store and use about you includes, but is not restricted to:

- Personal information (such as names, addresses, telephone numbers, e-mail addresses and other contact details).
- Car details (about those who use our car park facilities).
- Bank details and other financial information.
- Personnel files, including in connection with academics, employment or safeguarding.
- Where appropriate, information about individuals' health and welfare, including contact details for next of kin.
- References given or received by the School and relevant information provided by previous educational establishments and/or other organisations working with our staff.
- Correspondence with and concerning staff.
- Images of staff (and occasionally other individuals) engaging in School activities and images captured by the School's CCTV system (in accordance with the School's policy).
- National insurance and pension reference numbers.
- Employment contracts and remuneration details.

Why the School needs to process and collect personal data

Data will be processed for the following purposes of, but not restricted to:

- Data will be processed for the purposes of responding to requests for information about joining the School.
- For the purpose of employment to confirm the identity of prospective staff and to administer the contracts of employment of members of staff.
- To manage, plan and forecast, for research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis).
- To give and receive information and references about a past, current or prospective staff member.
- To safeguard pupils' welfare and provide appropriate pastoral care.
- To monitor (as appropriate) use of the School's IT and communication systems in accordance with the School Rules, and ICT Acceptable Use Policy.
- For security purposes, including CCTV, in accordance with the School's CCTV policy.
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process.
- Where otherwise reasonably necessary for the operation of the School, including to obtain appropriate professional advice and insurance.

The data the School holds will be the minimum it requires to form and maintain the contract between you and the School.

The School will only collect and your personal data when the law allows us to. Most commonly, we will use your personal data:

- When performing our contract with the employee to provide employment
- By obtaining your consent to use personal data in a certain way

How the School collects data

Generally, the School collect personal data directly from the you. This may be via a form, or simply in the ordinary course of interaction or communication.

In some cases personal data will be supplied by third parties (for example another School or other professionals or authorities working with that individual) or collected from publicly available resources.

Where it is mandatory to collect information from you, we will explain the possible consequences of not complying.

With whom does the School share your data with

The School will share your data with the following companies who have contracts with the School and who have equalled the School's precautions and systems for dealing with data, these are:

- Caterers
- Photographers
- Health care service providers
- IT Contractors
- IT software providers
- Professional advisers (eg lawyers, insurers and accountants);
- Government authorities (eg, HMRC, DfE, police, the local authority)
- Appropriate regulatory bodies (eg the Independent Schools Inspectorate, the Charity Commission, the Information Commissioner, the Cumbria Safeguarding Children Partnership - CSCP).
- Feeder schools and educational establishments that staff attend before/after leaving us
- Examination Boards
- Travel companies / External activity providers
- DBS Clearance provider

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the School organises, should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it be required.

How is the data kept securely and for how long is it retained

The School has put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limited access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

The retention period for employee data will be the duration of employment plus seven years, (and/or be modified by any other legal obligation the School finds itself under). A reasonable amount of information will be kept for safeguarding and/or 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”)

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