



RUGBY SCHOOL GROUP PRIVACY NOTICE FOR PARENTS & GUARDIANS

What this Privacy Notice is for

This Notice is intended to provide information about how and why the School use personal information about you. This Notice applies equally to current, past or prospective parents and guardians. This Notice applies to all UK schools in the Rugby School Group, and the term "School" is used in the Notice to refer to all schools in the Group.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. You are encouraged to read this Privacy Notice and understand the School's obligations to its entire community.

This 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.

This Privacy Notice also applies in addition to the School's other relevant terms and conditions and policies including:

- any contract between the School and you;
- the School's Images Policy;
- the School's CCTV Policy;
- the School's Document Retention Policy;
- the School's Safeguarding and Child Protection Policy and Health and Safety Policies; and
- the School's IT policies, including its Student Online Safety Policy.

What is personal information?

Personal information is information that identifies you as an individual and relates to you.

This includes your contact details, next of kin and financial information. We may also hold information such as your religion or ethnic group. CCTV, photos and digital recordings of you are also personal information.

Responsibility for data protection

The School, including the Arnold Foundation and the School's alumni organisations, are registered with the Information Commissioner's Office (ICO) as Data Controllers and are responsible for what personal data is collected, how it is used and for its protection. Rugby School's (including the Group's prep schools) registration number with the ICO is Z6175287.

The School has appointed the School Pro TLC as its Data Protection Officer who will deal with all your requests and enquiries concerning the School's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this Notice and Data Protection Law. They can be contacted at DPO@schoolpro.uk. Enquiries about this policy can also be sent to infosecurity@rugbyschool.net.



Why the School needs to process personal data

In order to carry out its ordinary duties to staff, students and parents and guardians, the School needs to process a wide range of personal data about individuals as part of its daily operation.

The School will need to carry out some of this activity in order to fulfil its legal rights, duties or obligations – including those under contract with its staff, or parents and guardians of its students.

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 its "legitimate interests":

- We obtain information about you from our admissions Registration Form and Acceptance Form, from your child's previous school and we may also obtain information from professionals such as doctors and from local authorities for the purposes of student selection and to confirm the identity of prospective students and their parents.
- To provide education services, including musical education, physical training or spiritual development, career services and co-curricular activities to students, and monitoring students' progress and educational needs;
- Maintaining relationships with alumni through the alumni organisation, including regular updates and fundraising activity.
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed by law such as tax, diversity or gender pay gap analysis;
- To enable 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 past, current and prospective students, including relating to outstanding fees or payment history, to/from any educational institution that the student attended or where it is proposed they attend;
- To provide references to other schools, universities or employers of past students;
- To enable students to take part in national or other assessments, and to publish the results of public examinations or other achievements of students of the School;
- To safeguard students' welfare and provide appropriate pastoral care;
- To monitor, as appropriate, use of the School's IT and communications systems in accordance with the School's Student Online Safety Policy ;
- To make use of photographic images of students in school publications, on the School website and, where appropriate, on the School social media channels in accordance with the School's Images Policy. The context would be to promote the School to prospective parents and students. These images may still be used after your child has left the School;
- 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; and
- Where otherwise necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School.
- Information about you may also be used for historical research or for statistical purposes.

In addition, the School will on occasion need to process special category personal data concerning health, ethnicity, religion, sexual life or criminal records information such as when carrying out DBS checks 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 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 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 learning development for a student;
- As part of any School or external complaints, disciplinary or investigation process that involves such data, for example if there are learning development, health or safeguarding elements; or
- 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.

Types of personal data processed by the School

This will include, for example:

- Names, addresses, telephone numbers, e-mail addresses and other contact details;
- Vehicle details about those who use our car parking facilities;
- Bank details and other financial information; for example, about parents who pay fees to the School;
- To verify parents' identity and so that we can assess any application by a parent for the award of a bursary or for credit in contemplation of an agreement for the deferment of fees, we may search the files of any licensed credit reference agency who will keep a record of that search and details about your application. This record will be seen by other organisations which make searches about you. Failure to supply information may result in a refusal of an award or credit;
- Past, present and prospective students' academic, disciplinary, admissions and attendance records, including information about any special needs, and examination scripts and marks;
- Where appropriate, information about individual's health and welfare, and contact details for 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 students and parents past and present; and
- Images of students and occasionally other individuals engaging in School activities, and images captured by the School's CCTV system in accordance with the School's Images and CCTV Policies.

How the School collects data

Generally, the School receives personal data from the individual directly including, in the case of students, from their parents. This may be via a form, or simply in the ordinary course of interaction or communication such as an e-mail or written assessments.

However, in some cases personal data will be supplied by third parties. For example, from another school or other professionals or authorities working with that individual; or from other students; or collected from publicly available resources.



Who has access to personal data and who the School shares it with

Occasionally, the School will need to share personal information relating to its community with third parties, such as:

- Professional advisers, for example lawyers, insurers, PR advisors and accountants;
- Examinations Boards;
- External professionals who visit the School, such as music or sports coaches;
- School or universities that the student attends after us;
- Travel companies organising school trips;
- Government authorities, for example HMRC, DfE, police or the local authority; and
- Appropriate regulatory bodies, for example the Independent Schools Inspectorate, the Charity Commission or the Information Commissioner.

The School will also share data with other areas of the Rugby School Group.

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 apply in the context of:

- Medical records held and accessed only by the School doctors and appropriate medical staff under his/her supervision, or otherwise in accordance with express consent; and
- Pastoral or safeguarding files.

However, a certain amount of any learning development 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.

Parents and Guardians 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 it, 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 safeguarding files, and, in some cases referrals to relevant authorities such as the LADO or police. For further information about this, please view the School’s Safeguarding and Child Protection Policy available on the School’s website.

Finally, in accordance with Data Protection Law, some of the School’s processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the School’s specific directions.

How long we keep personal data

The School will retain personal data securely and only in line with how long it is necessary to keep it for a legitimate and lawful reason. Parents should note that, the legal recommendation for how long to keep ordinary student personnel files is until the student reaches 25 years of age. However, incident reports and safeguarding files will need to be kept much longer in accordance with specific legal requirements. Data relating to parents and guardians will be retained in line with our Retention Policy, and usually no longer than 6 years following your child leaving the School.

If you have any specific queries about how our retention policy is applied, wish to obtain a copy of the School’s Document Retention Policy, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact infosecurity@rugbyschool.net. 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 request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; 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, this is called a “suppression record”.

Keeping in touch and supporting the school

The School, and its alumni organisations, will use contact details of parents, alumni and other members of the School community to keep them updated about the activities of the School, or alumni and parent events of interest, including by sending updates and publications, by email and by post. Unless the relevant individual objects, the School will also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the School community;
- Should you wish to limit or object to any such use, or would like further information about them, please contact infosecurity@rugbyschool.net. You always have the right to withdraw consent, where given, or otherwise object to regular updates or fundraising. However, the School is nonetheless likely to retain some of your details, not least to ensure that no more communications are sent to that particular address, email or telephone number.

Further details on how alumni data is controlled and managed are set out in the Group’s separate Alumni Privacy Notice.

Your rights

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the School, 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.

Any individual wishing to access or amend their personal data or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request to infosecurity@rugbyschool.net or contact the appropriate school directly using the normal contact methods.

The School will endeavour to respond to any such requests as soon as reasonably practicable and in any event within statutory time-limits which is typically one month in the case of requests for access to information.

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, the School may ask you to reconsider.

Requests that cannot be fulfilled

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, this may include your own children, in certain limited situations, please see further below, 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 legal action.

The School is also not required to disclose any student examination scripts or other information consisting solely of student test answers, provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the School itself for the purposes of the education of any individual.



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

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 “Whose rights?” below). A student of any age may ask a parent or guardian to make a subject access request on his/her behalf.

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger students, the law still considers the information in question to be the child’s; for older students, the parent making the request may need to evidence their child’s authority for the specific request.

Students aged 12 and above are generally assumed 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

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.

Parents will in general receive educational and pastoral updates about their children. Where parents are separated, the School will, in most cases, aim to provide the same information to each person with parental responsibility, but may need to factor in all the circumstances including the wishes of the child.

Consent

Where the School is relying on consent to process personal data, any person may withdraw this consent at any time. Examples where we do rely on consent are certain types of uses of images and certain types of fundraising activity. Please be aware however that the School may not be relying on consent but have other 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 otherwise exist under some form of contract or agreement with the individual, for example the parent contract.

Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates. However, the School will often rely on parental authority or notice 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).

Where consent is required, it may in some cases be necessary or 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.

In general, the School will assume that student’s consent is not required for ordinary disclosure of their personal data to their parents, for example, 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 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, 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.

Data accuracy and security

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 please notify the Compliance Officer of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected and has the right to halt the processing of their personal data whilst any errors or omissions are corrected, subject to certain exemptions and limitations under Data Protection Law. Please see above for details of why the School may need to process your data and of who you may contact if you disagree.

The School will 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. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

This policy

The School will 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.

Queries & Complaints

Any comments or queries on this policy should be directed to the DPO at DPO@schoolpro.uk or the School at infosecurity@rugbyschool.net.

If an individual believes that the School has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the School's complaints procedure detailed in the Procedure on the handling of Parental Complaints policy located on the School's website. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO) at: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, Tel: 0303 123 1113 or at: <https://ico.org.uk/concerns/>, although the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.