

Bedales School
Full Privacy Notice

December 2024

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Introduction

Bedales School is a charity registered with the Charity Commission in England and Wales. Our charity number is 307332 and a company limited by guarantee registered in England and Wales no. 276785. registered office Church Road Steep Petersfield Hampshire GU32 2DG. In this notice, references to 'We', 'Our' and 'Us' mean the School and reference to 'You' means anyone providing the School with personal data.

When you provide us with personal data to engage with us and/or benefit from our activities, we will keep a record of the data you give to us to enable us to comply with our statutory obligations and to achieve our charitable objectives of advancing and maintaining education through the operation of our School.

For the UK General Data Protection Regulation (UK GDPR), the School through its Governors will be a Data Controller in respect of your personal data. In some cases, the School may be a joint Data Controller of your personal data (e.g., where your data is shared between the School and another organisation for a particular purpose). A full glossary of terms is available at the end of the Notice.

Everyone has rights regarding how their personal data is handled by organisations. The School is committed to ensuring that personal data is properly and securely managed in accordance with the relevant data protection laws and believes this is an important part of achieving trust and confidence between the School and those with whom it interacts.

Please read this Notice, which explains how we use and protect the information that you provide to us or that we obtain or hold about you, and to understand what your rights are in relation to information that we hold. This Notice applies to information about living identifiable individuals only.

What personal data will we hold about you?

We may hold the following types of Personal Data:

- name and contact details.
- gender, age, date of birth, marital status, and nationality.
- information about your education/work history and professional qualifications.
- information regarding your employment contract.
- information regarding your volunteer agreement.
- information about your family and any dependents.
- information about your current involvement in School activities and events.

- financial information (e.g., bank details) and details of any donations you have made to us in the past.
- information obtained because of any background checks on volunteers.
- CCTV recordings and photographs.
- information we collect through your use of our website(s) such as IP addresses and other information collected using cookies.
- any other information which you choose to provide to us or that we are provided by others.

We may also hold special categories of personal data e.g., information about your health and wellbeing, information revealing racial or ethnic origins, information concerning your sexual orientation or in the case of background checks, information about criminal records or proceedings.

We may also receive personal data about you from third parties, for example, your family members, medical professionals, the police, and other law enforcement bodies.

Dealing with reports of Safeguarding Issues

We take all reports of safeguarding issues in the School very seriously. If a report is made, we will handle it in accordance with our established safeguarding procedures. This is likely to involve the processing of personal information about various individuals, including victims and survivors, alleged perpetrators, and witnesses. As part of our procedures, we may appoint and share personal information with an investigator or assessor from outside the School to investigate and to advise us on appropriate action to take. Where we believe it is necessary to do so, we will also share personal information with the statutory authorities, such as the police or local authority. We will always handle reports sensitively and keep individuals informed about how their personal information will be used.

How and why do we process your personal data?

The personal data which we hold about you, whether it is collected directly from you or whether we receive it from a third party, may be processed in several ways. For example:

- to communicate with you in relation to news about or, activities and events taking place in the School, including seeking feedback and informing you of any changes to our activities.
- to improve our activities and the way we communicate with you, including our website.
- to carry out our activities
- to process payments that you may make to us or other payments where, for

example, you hire facilities belonging to the School.

- to administer, support, improve and develop the administration of the School's work and operations and to keep the School's accounts and records up to date.
- to process applications from you, including admissions applications and applications for a role within the School.
- to identify potential additional sources of fundraising such as identifying those eligible to make Gift Aid nominations and other forms of wealth screening.
- for audit and statistical purposes
- to ensure we comply with our legal obligations (e.g., by providing information to the Charity Commission or HMRC or carrying out safeguarding activities).
- in the case of CCTV recordings, to prevent or detect crime, and to help create a safer environment for our employees, students and visitors.
- to address and respond to any reports of abuse we may receive in accordance with our safeguarding procedures.
- to address and respond to any complaints we may receive in accordance with our complaints, procedures.

Any information gathered through cookies and similar technologies via the School website is used to measure and analyse information on visits to the website, to tailor the website, to make it better for visitors and to improve technical performance. We will not use the data to identify you personally or to make any decisions about you.

On what grounds do we process your personal data?

We must have a lawful basis for processing your information; this will vary according to the circumstances of how and why we have your information, but typical examples include:

- the activities are within our legitimate interests in advancing and maintaining the School, in providing information about the activities of the School, and to raise charitable funds (e.g. where we use alumni data to advertise fundraising events);
- you have given consent (which can be withdrawn at any time by contacting us) for us to process your information (e.g. to send you promotion or fundraising communications by email or SMS);
- we are carrying out necessary steps in relation to a contract to which you are party or prior to you entering into a contract (e.g. employment contract, or where you enter into a hire agreement for one of our facilities);
- the processing is necessary for compliance with a legal obligation (e.g. where

we pass on information to a local authority for safeguarding or other reasons);

- the processing is necessary for carrying out a task in the public interest (e.g. updating and maintaining the register students); or
- to protect your vital interests (e.g. where there is a risk of death or serious injury to that person or another individual then we may pass on information to the Police or NHS for treatment purposes).

If we process any special categories of personal data, we must have a further lawful basis for the processing.

This may include:

- where you have given us your explicit consent to do so (e.g. to cater for your medical or dietary needs);
- where the processing is necessary to protect your vital interests or someone else's vital interests (e.g. passing on information to the Police where there is a risk of death or serious injury to that person or another individual);
- where the processing is carried out with appropriate safeguards in the course of our legitimate activities as a school working with and supporting our current and former students who have regular contact with the School in connection with the School's purposes (e.g. carrying out school activities or pastoral care), and the information is not shared outside the School other than with your consent.
- where the processing is necessary for the establishment, exercise, or defence of legal claims;
- where the processing is necessary for carrying out the School's employment and social security obligations; or
- the processing being necessary for reasons of substantial public interest (e.g. where steps are taken to prevent fraud or other dishonest activity);
- provided that the legal basis is proportionate to the aim pursued and provides for suitable and specific measures to safeguard your rights, or as part of our legitimate interests as a School and charitable institution.

If we process any personal data comprising criminal convictions or offences, we must also have a further lawful basis for the processing. This may include:

- where the School is exercising obligations or rights which are imposed or conferred by law on us or you in connection with employment, social security or social protection and the School has an appropriate policy document in place (e.g. to undertake appropriate checks on individuals prior to taking up a role);
- where it is necessary for the prevention or detection of an unlawful act (e.g. passing on information to the Police or other investigatory body);

- where the School is complying with or assisting others to comply with regulatory requirements relating to unlawful acts or dishonesty (e.g. passing on information to the Police or other investigatory body);
- where it is carried out in the course of safeguarding children or other individuals at risk (e.g. making a safeguarding disclosure);
- where an individual has given their consent to the processing;
- where the School is establishing, exercising or defending legal claims (e.g. providing information to our insurers or lawyers in connection with legal proceedings);
- where it is necessary to protect the vital interests of an individual (e.g. passing on information to the Police where there is a risk of death or serious injury to that person or another individual); or
- where it is carried out in the course of the School's legitimate activities as a not-for-profit body with educational aims (e.g. carrying out pastoral activities).

Who will we share your personal data with?

We will only use your personal data within the School for the purposes for which it was obtained, unless you have explicitly agreed that we may share your personal data with another organisation or unless we are otherwise permitted or required to under Data Protection Laws or order of a Court or other competent regulatory body or as set out in this Notice.

We may share your information with government bodies for tax purposes or law enforcement agencies for the prevention and detection of crime.

As a registered charity, we may share your information with our regulator, the Charity Commission. If there is information which is relevant to our insurance, we may also need to share it with our insurance brokers, insurers and legal advisors.

If we receive a report of abuse, we may decide to appoint an individual from outside the School to undertake an investigation or assessment and to advise us on appropriate action to take. Where we believe it is necessary to do so, we will also share personal information with appointed investigators/assessors and with the statutory authorities, such as the police or local authority.

Sometimes the School contracts with third parties whom we ask to process personal data on our behalf (e.g. IT consultants, distributors of written communication, fundraising partners). We require these third parties to comply strictly with our instructions and with the UK GDPR.

We also may be required to share your personal data so that the School can benefit from Gift Aid nominations you have made e.g. with HMRC.

We have in place administrative, technical, and physical measures designed to guard against and minimise the risk of loss, misuse or unauthorised processing or

disclosure of the personal data that we hold. Every member of the School has a responsibility to uphold and abide by these measures.

While processing your personal data, or disclosing it to the recipients referred to above, we may transfer it to countries which are outside the UK, some of which may not have laws which provide the same level of protection to your personal data as laws inside the UK. In such cases we will take steps to ensure that the transfers comply with the UK GDPR and that your personal data is appropriately protected. We do so by taking the following measures:

- putting in place a contract of binding corporate rules or standard contractual clauses with the recipient that means they must protect the personal information to the same standards as is required in the UK;
- transferring it to a non-UK country with privacy laws that give the same protection as the UK;
- transferring it to a country that has an adequacy decision that allows data transfers (such as Guernsey and Jersey, see [ICO website](#) for more details).
- transferring it to organisations or countries that have other approved certification schemes or codes in place; or
- relying on another appropriate ground under applicable data protection laws.

How long will we keep your information for?

Your information will be kept in accordance with our Retention Schedule, copies of which are available from the Bursar's Office. In any event, we will endeavour to only keep personal data for as long as is necessary and to delete it when it is no longer so.

Your rights

You have rights in respect of the personal data you provide to us. In particular:

- the right to request a copy of some or all of the personal data that we hold about you (including, in some cases, in a commonly used, machine readable, format so that it can be transferred to other Data Controllers). We do not make a charge for this service.
- if we process your personal data on the basis that we have your consent, the right to withdraw that consent.
- the right to ask that any inaccuracies in your personal data are corrected.
- the right to have us restrict the processing of all or part of your personal data.
- the right to ask that we delete your personal Data where there is no compelling reason for us to continue to process it.

- the right to object to us processing your personal data for direct marketing purposes e.g., in relation to fundraising or wealth screening carried out by the School; and
- the right not to be subject to legal or other significant decisions being taken about you on the basis of an automated process (i.e., without human intervention).

Please note that the above rights may be limited in some situations – for example, where we can demonstrate that we have a legal requirement to process your personal data. Also, we may need you to provide us with proof of identity for verification and data security purposes before you can exercise your rights.

Rights may only be exercised by the individual whose information is being held by the School or with that individual's express permission. Children from approximately 12 years and older are entitled to make their own requests (where the School is of the reasonable view that they have an appropriate understanding of the request they are making) and parents / guardian / family members do not have an automatic right to see information about their child or prevent their child from making a request to the School.

Changes to the Notice

We may make changes to this Notice from time to time as our organisational practices and/or applicable laws change. We will not make any use of your personal information that is inconsistent with the original purpose(s) for which it was collected or obtained. (if we intend to do so, we will notify you in advance wherever possible) or otherwise than is permitted by data protection laws.

Contact details

If you have any questions, require further information about how we protect your personal data, if you wish to exercise any of the above rights or if you would like to provide feedback or make a complaint about the use of your information, please contact the Bursar at bursar@bedales.org.uk

Any complaints will be dealt with in accordance with the School's Policy for Complaints.

We hope that we can satisfy any queries you may have about the way in which we process your personal data. However, if you have unresolved concerns, you also have the right to complain to the Information Commissioner ('ICO') (www.ico.org.uk).

Cookies

Cookies, also known as browsers or tracking cookies, are small text files that are added to your computer when you visit a website. They help websites to perform certain functions e.g. to know who you are if you log into a restricted part of a website, for booking events, and for tracking purposes.

The School uses the following cookies:

- **Google analytics.** We use Google analytics cookies on the website for tracking purposes. The cookies allow us to understand general traffic to our website for example the number of visitors and length of time on site. This process does collect data, but in an anonymous form, to help us make improvements, develop the website, and enhance the user experience.
- **Privacy preferences.** We may use a tracking cookie, which is added to your computer, to remember your cookie preferences i.e. if you have allowed or disallowed them.
- **Register for events.** We have the ability for you to register for events on the website. If you do so this information goes directly into our database. In order to register our database adds an essential cookie (reaction server) to your computer.

Manage Cookies

If you would like to opt-in or opt-out of using cookies, then you should be able to do so using your browser. You can review your cookie settings at any time. Please note that you cannot opt-out of the deployment of cookies that are necessary for delivery of our websites or services to visitors.

Glossary

"Data Controller" has a specific meaning within the General Data Protection Regulation. It means a person, organisation or body that determines the purposes for which, and the manner in which, any Personal Data is processed. The School is the sole Data Controller, and this includes all processing of data that is carried out by any School employee, volunteer and agencies. The School, as Data Controller, is responsible for complying with the data protection laws including the UK GDPR and establishing practices and policies in line with them.

"Data Processor" means any person, organisation or body that processes personal data on behalf of and on the instruction of the School (eg a contractor). Data Processors act on the instructions of the Data Controller and have a duty to protect the information they process by following data protection laws.

"Data Subject" means a living individual about whom the School processes personal data and who can be identified from the personal data. A Data Subject need not be a UK national or resident. All Data Subjects have legal rights in relation to their personal data and the information that the School holds about them.

"Personal data" means any information relating to a living individual who can be identified from that information or in conjunction with other information, which is in another's possession, or is likely to come into possession. Personal data can be factual (such as a name, address, or date of birth) or it can be an opinion (e.g. a performance appraisal). It can even include a simple email address. A mere mention of someone's name in a document does not necessarily constitute personal data, but personal details such as someone's contact details or salary (if it enabled an individual to be identified) would fall within the definition. An item of personal data can belong to more than one Data Subject if they are both/all identifiable.

"Processing" means any activity that involves use of personal data. It includes obtaining, recording, or holding the information or carrying out any operation or set of operations on it, including organising, amending, retrieving, using, disclosing, erasing or destroying it. Processing also includes transferring or disclosing personal data to third parties.

"Special categories of personal data" (previously called sensitive personal data) means information about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health or condition, or data concerning a natural person's sex life or sexual orientation. It also includes the processing of genetic and biometric data for identification. Special categories of personal data can only be processed under strict conditions and such processing will usually, although not always, require the explicit consent of the Data Subject