

## INDEPENDENT SCHOOLS' GDPR PRIVACY NOTICE

### INTRODUCTION

The Effingham Schools Trust (EST) is a partnership of neighbouring schools, St Teresa's and Cranmore. The partnership forms a diamond model school, a powerful and exciting educational proposition, delivering all the advantages of both single sex and co-education to pupils. The Trust educates the initial years of school at Cranmore in a co-educational environment, before commencing with single sex on separate sites until the age of 16. The co-educational Sixth Form will open in September 2025.

St Teresa's and Cranmore School offer a strong, caring community based on their Catholic traditions, but remain an inclusive environment that welcomes pupils from all faiths and those of none. With recognised strengths spanning academia, sport as well as the creative and performing arts, we focus on the individual, allowing the pupils to achieve their best and enabling them to attain their full potential.

Effingham Schools Trust, a company registered in England and Wales, is constituted as a charitable company registered under charity number **1095103**, and as a company limited by guarantee under company number **04509623**. Our registered office is at Effingham Hill, Dorking, Surrey, RH5 6ST. Effingham Schools Trust. The objects of the charity is the provision of educating boys and girls.

Effingham Schools Trust is required to process personal data and as such is a data controller for the purposes of data protection legislation including the UK Data Protection Act (UK GDPR) and the Data Protection Act 2018 (DPA). In accordance with such legislation each data controller should have, provide and maintain its own Privacy Notice and comply with the relevant legislation regarding the handling of personal data.

This Privacy Notice is intended to cover the data processing of Effingham Schools Trust.

### WHAT THIS PRIVACY NOTICE IS FOR

This **Privacy Notice** is intended to help you understand how and why we collect personal information. It explains how and why the schools will use (or "process") personal data about individuals including: its staff; its current, past and prospective pupils; and their parents, carers or guardians. Collectively, we refer to these individuals in the Privacy Notice as the School's community.

This information is provided because Data Protection Law allows individuals rights to understand how their data is to be used. Staff, parents, pupils and clients are all encouraged to read this Privacy Notice and understand the school's obligations to its entire community. In addition, Effingham Schools Trust have a separate data protection policy.

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 its staff, or the parents of pupils;

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- any policies or notices applicable to staff concerning the handling of personal data;
- the school's policy on taking, storing and using images of children;
- the school's CCTV policy;
- the school's retention of records policy;
- the school's Safeguarding, Pastoral, and Health and Safety policies, including as to how concerns or incidents are recorded;
- the school's IT policies, including its Acceptable Use policy and eSafety policy,
- Anyone who works for, or acts on behalf of, the school (including staff, volunteers, governors and service providers) will be subject to suitable training and/or policies commensurate with their role.

## RESPONSIBILITY FOR DATA PROTECTION

Effingham Schools Trust has appointed Jane Sladen as Data Manager and Victoria Low as Director of Operations who will:

- Deal with all your requests and enquiries concerning the schools' use of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law. They can be contacted at [j.sladen@effinghamschools.org](mailto:j.sladen@effinghamschools.org) or [v.low@effinghamschools.org](mailto:v.low@effinghamschools.org) or by telephone: 01372 452037; or by post: Effingham Schools Trust, Effingham Hill, Dorking, Surrey, RH5 6ST

## KEY TERMS

**"Data Controllers"** means organisations, including independent schools, which determine how people's personal data is processed and for what purpose.

**"Data Manager"** means the person who will process Schools/People's personal data

**"Data Subjects"** means any living individuals whose data the Data Controller processes

**"Processing"** means any action in relation to that personal data, including filing and communication

**"Individuals"** includes current, past, and prospective staff, pupils or parents and clients

**"Personal Data"** includes everything from which a Data Subject can be identified. It ranges from simple contact details via personnel or pupil files to safeguarding information, and encompasses opinions, file notes and minutes, a record of anyone's intentions towards that person, and communications (such as emails) with or about them

**"School or Schools"** means Cranmore School and/or St Teresa's School

**"Parents"** means Parents, Carers and Guardians

Some categories of Personal Data are **"special category data"**. These comprise of data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; data concerning health or data concerning sexual orientation. Extra safeguards are provided by law for processing of such data.

## KEY REQUIREMENTS OF THE UK GDPR

UK GDPR determines the five most important legal requirements for a Privacy Notice to be:

1. the identity and the contact details of the data controller;
2. details of any relevant person at the School to contact;
3. the purposes and legal basis for any processing at the School;
4. a list of legitimate interests, where relied on;
5. anyone the data is passed onto, even in general terms;

## WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to staff, pupils, parents and clients, the school needs to process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of its daily operation.

Some of this activity the school will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with its staff, or parents of its pupils or clients.

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 (or its community's) "legitimate interests":

- For the purposes of pupil selection: to confirm the identity of prospective pupils and their parents, and retain a record if appropriate for the purposes of future applications or openings;
- To provide education services, including musical education, physical training or spiritual development, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Maintaining relationships with alumni and the school community, including direct marketing or fundraising activity;
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax);
- 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 and current pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attend or where it is proposed they attend; and to provide references to potential employers of past pupils;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the school;
- To safeguard pupils' welfare and provide appropriate pastoral care;

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- To monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's IT: 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 on taking, storing and using images of children;
- 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
- To enable staff recruitment, and the giving and receiving of references from past, present and current members of staff; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

In addition, the school will on occasion need to process **special category personal data** (concerning health, ethnicity or religion) 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 and employment, or from time to time by explicit consent where required. These reasons will include:

- To safeguard pupils' 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 special educational needs of a pupil;
- To provide spiritual education in the context of any religious beliefs;
- In connection with employment of its staff, for example DBS checks, welfare, union membership or pension plans;
- To run any of its systems that operate CCTV, such as for security and other forms of pupil identification (lockers, lunch etc.);
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are SEND, 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.

## LEGITIMATE INTERESTS

Legitimate interests, and not consent, will be the primary legal condition the School relies upon for processing most pupil and alumni data. It will also be highly likely to apply to other types of personal data (staff, parent and client) processed by schools, although where the School has a direct contract with an individual (e.g. an employee, client, contractor or parent) then there may also be a contractual basis to process that individual's data.

However, neither contractual grounds nor legitimate interests will be sufficient to process sensitive or “special category” personal data. This will usually require explicit consent to process, except where the School is acting under a statutory right or obligation (e.g. concerning employment or safeguarding) or if particular rare and urgent grounds exist (e.g. preventing or detecting a crime, working with social services, or acting to protect someone’s vital interests to protect them from imminent harm).

## WHEN WILL THE SCHOOL SEEK TO OBTAIN CONSENT

1. **Direct Marketing:** this includes communications promoting the "aims and ideals" of the School as well as communications about fundraising, with strict consent rules where it is sent by electronic means (e.g. email or SMS) or if the School wants to make marketing calls to parents or alumni.
2. **Examination Results:** The school will separately inform pupils and parents (and provide an opportunity to raise any objections) where it intends to publish exam results other than on an anonymous basis (e.g. if released to the media or on a publicly accessible notice board).
3. **Monitoring emails, internet and telephone usage:** Strict rules apply to monitoring of pupil internet use, emails and calls (except where this is done on an anonymous basis, e.g. to monitor email or internet traffic within the school as a whole). Although KCSIE prescribes that schools have in place appropriate filtering and monitoring for the purpose of safeguarding, this will not be used as a basis to allow casual or routine interception of communications, notably calls and messaging. However, monitoring may become justifiable in certain circumstances in compliance with KCSIE.
4. **Using certain types of Special Category Personal Data**
5. **Unexpected or intrusive uses of images of pupils:** certain uses, such as CCTV or school photography for use in the School’s own "community" media (e.g. its publications, including emailed newsletters and the intranet), including where individuals are clearly identifiable from the photograph, and sometimes named, are considered to be part of the contractual and legitimate interest of the School. However, should an individual not wish to be included in such usage, they should make this known to the School and those wishes will be respected.
6. **Contact from Parent/Teacher Association;** If you are a parent and/or a member of the Parent Teacher Association, the school may share your contact details with the PTA.

Sometimes, external media usage may be better dealt with by consent: especially where a child is identified by name or especially prominently featured, or in swimming or games uniform.

Please remember that, once given, consent may be withdrawn at any time.

If you wish to make any representation to the School about how your data, including images, are used, please contact the Data Manager at [j.sladen@effinghamschools.org](mailto:j.sladen@effinghamschools.org) or c/o St Teresa’s School, Effingham Schools Trust, Effingham Hill, Dorking, Surrey, RH5 6ST or by telephoning [01372 452037](tel:01372452037)

## TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);

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- bank details and other financial information, e.g. about parents (or others) who pay fees to the school, and any anti money laundering information we are required to collect by law;
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- personnel files, including in connection with academics, employment or safeguarding;
- where appropriate, information about individuals' health and welfare, and contact details of their 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 staff, pupils and parents 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);
- A pupil photograph will be used in the School Management System; and
- Alumni data

### HOW THE SCHOOL COLLECTS DATA

Generally, the school receives personal data from the individual directly (including, in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

However, 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.

### 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 (lawyers, insurers, PR advisers and accountants) or relevant authorities (HMRC, DfE, police or the local authority) or appropriate regulatory bodies (e.g. the ISI, the Charities Commission or the Information Commissioner's Office (ICO)) or relevant agencies (such as external data analysis organisations for the purposes of analysing examination results or cognitive ability testing).

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 and
- pastoral or safeguarding files.

However, a certain amount of any 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.

Staff, pupils and parents 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 personnel or pupils, including the express wishes of the child and any court orders which may be in place 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 Policy.

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 and policies.

## ACCESS TO SENSITIVE DATA

Particularly strict rules of access apply in the context of "special category" data, most notably:

- medical records; and
- pastoral or safeguarding files.

Medical data. The school needs to process such information to comply with statutory duties and to keep pupils and others safe, but the school will ensure only authorised staff can access information on a need-to-know basis. This may include wider dissemination if needed for school trips or for catering purposes. Express consent will be sought where appropriate.

However, a certain amount of any SEND 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.

Safeguarding data. Staff, pupils and parents are reminded that the school is under duties imposed by law and statutory guidance (including [Keeping Children Safe in Education or KCSIE](#)) to record or report incidents and concerns that arise or are reported to them, 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 Personnel or Safeguarding files, low-level concerns records kept about adults, and in some cases referrals to relevant authorities such as the LADO or police.

KCSIE also requires that, whenever a child leaves the school to join another school or college, his or her child protection file is promptly provided to the new organisation. The school will retain a copy in accordance with its retention policy for material related to safeguarding matters.

For further information about this, please view the school's Safeguarding Policy.

## DATA PROCESSING REGARDING EXTERNAL EXAMINATIONS

Examination results, outcomes of reviews of marking, reviews of moderation and appeals may be shared within an examination consortium where such exists and may be retained according to their policies. External examination results will be shared with external data analysis organisations for the purposes of results analysis. Where malpractice is suspected or alleged, then personal data may be shared with other awarding bodies, the qualifications regulator or professional bodies in accordance with JCQ policies, procedures and 'Information for Candidates - Privacy Notice'.

Information or evidence provided to support a request for special consideration may be shared with the relevant awarding body, will be retained in school and may be used to support any application to

a further institution. Examination related data will be processed, retained and shared with educational bodies where necessary in order to provide an audit trail of the results certificated and to maintain an accurate record of an individual's achievements.

## HOW LONG WE KEEP PERSONAL DATA

The GDPR does not fundamentally change the principles for length of document retention – it is still a question of relevance and purpose, as well as data security. It does, however, have stricter rules about use and storage of personal data generally with the practical effect of requiring more dynamic, efficient and secure storage systems.

The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason.

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 in order to fulfil your wishes (called a "suppression record").

If you have any specific queries about how our retention decisions are applied, or about the School's guidelines for the retention of data or wish to request that personal data that you no longer believe to be relevant is considered for deletion, please contact [j.sladen@effinghamschools.org](mailto:j.sladen@effinghamschools.org). However, it is of note that the school will often have lawful and necessary reasons to retain some personal data even following such request.

## KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

The School will use the 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 newsletters, by both email and 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, such as the parent/staff associations and alumni associations;
- Contact parents and/or alumni by post and email in order to promote and raise funds for the school and, where appropriate, other worthy causes;
- Collect information from publicly available sources about parents' and former pupils' occupation and activities, in order to maximise the school's fundraising potential;
- Use personal data to develop and deliver a range of alumni services.

Should you wish to limit or object to any such use, or would like further information, please contact Jane Sladen [j.sladen@effinghamschools.org](mailto:j.sladen@effinghamschools.org). You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the School is nonetheless likely to retain some of your details (not least to ensure that no further communications are sent to that particular address, email or telephone number).

## Your Rights

Individuals (both pupils and parents) have various rights under Data Protection Law to access and understand their own personal data held and processed by the school, and in some cases may request that it is erased or amended, or to have it transferred elsewhere, or for the school to stop processing it – but subject to certain exemptions and limitations. Requests need to be made to Victoria Low [v.low@effinghamschools.org](mailto:v.low@effinghamschools.org) or Jane Sladen [j.sladen@effinghamschools.org](mailto:j.sladen@effinghamschools.org)

The school will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is generally one month. However, more complex or multiple requests, e.g., those involving third party information, are likely to take 1-2 months longer).

- Rights of access

The school will be better able to respond quickly to smaller, targeted requests for information made during term time. If the request for information is manifestly excessive or similar to previous requests, the school may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows).

If you consider that the personal data we hold on you is inaccurate, please contact us. However, the school will not necessarily delete or amend views, opinions, notes or records purely on the request of an individual who disputes the account, although we may keep a record of all parties' viewpoints.

- Requests that cannot be fulfilled

You should be aware that GDPR rights (including the right of access) are limited to your own personal data, and certain data is exempt. This will include information which identifies other individuals, and parents need to be aware this may include their own children, in certain limited situations 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 a legal action).

The school is also not required to disclose any pupil examination scripts (or other information consisting solely of pupil test answers – although markers' comments may still be disclosable if they constitute pupil personal data); provide examination or other test marks ahead of their ordinary publication date; nor share any confidential reference held by the school that was (or will be) given for the purposes of the education, training, appointment or employment of any individual.

You may have heard of the "right to be forgotten". 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 proportionate legitimate interest identified in this Privacy Notice. Generally, if the school still considers the processing of the personal data to be reasonably necessary, it is entitled to continue. All such requests will be considered on their own merits.

- Requests by or on behalf of pupils

Pupils 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. A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

A person with parental responsibility will generally be entitled to make a subject access request on behalf of younger pupils, the law still considers the information in question to be the child's. For older

pupils, the parent making the request may need to evidence their child's authority for the specific request. Requests not considered in the child's best interests may sometimes be refused.

Pupils at the senior school 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. It is also recognised that younger children may however be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

- 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 pupils without their consent. The school may consider there are lawful grounds for sharing with or without reference to that pupil.

Parents will in general receive educational and pastoral updates about their children, in accordance with the Parent Contract. 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 express wishes of the child, court orders, or pastoral issues.

All information requests from, on behalf of, or concerning pupils – whether made under subject access or simply as an incidental request – will therefore be considered on a case by case basis.

- Consent

Where the school is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Examples where we do rely on consent are: e.g. certain types of uses of images or certain types of fundraising activity. Please be aware however that the school may not be relying on consent, but 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 otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because a purchase of goods, services or membership of an organisation such as an alumni or parents' association has been requested).

- 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 pupils – for example, under the parent contract, or via a form. Parents and pupils should be aware that this is not necessarily the same as the school relying on strict consent.

Where consent is required, it may in some cases be necessary or appropriate – given the nature of the processing in question, and the pupil's age and understanding – to seek the pupil's consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child and age, the parents' rights in law or under their contract, and all the circumstances.

Parents also have a right to contract legally with the School in respect of their child's care and education. A parent may therefore have certain contractual and "duty of care" rights concerning how information about their child is used, and their right to receive it. This might range from routine updates (e.g. a school report), or because a parent's legitimate interests are engaged in a particular instance. While this can be difficult in situations where parents are separated, for example, as a

principle of family law each parent is entitled to the same information unless there is some specific court order or child protection provision to the contrary.

In general, the School will assume that pupils' 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 pupil's activities, progress and behaviour, and in the interests of the pupil's welfare. That is unless, in the School's opinion, there is a good reason to do otherwise.

However, where a pupil seeks to raise concerns confidentially with a member of staff, e.g. a school nurse 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 pupil or other pupils, or if required by law.

Pupils are required to respect the personal data and privacy of others, and to comply with the School's relevant policies, e.g. the acceptable use policy and the school rules. Staff are under professional duties to do the same. This is covered under the relevant staff policy.

## 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 reasonably possible. Individuals must notify the reception in the school to advise 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 (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, 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.

## REPORTING DATA BREACHES

Should a security incident take place, the School will quickly establish whether a personal data breach has occurred and, if so, promptly take steps to address it, including contacting the Information Commissioner's Office (ICO) if required.

A personal data breach can be broadly defined as a security incident which has affected the confidentiality, integrity or availability of personal data. In short, there will be a personal data breach whenever any personal data is lost, destroyed, corrupted or disclosed; if someone accesses the data or passes it on without proper authorisation; or if the data is made unavailable and this unavailability has a significant negative effect on individuals. It can include a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data and can be the result of both accidental and deliberate causes. It is more than just about losing personal data. Breaches should be reported to the ICO if they result in discrimination, damage to reputation, financial loss, loss of confidentiality or any other significant economic or social disadvantage. Such matters may separately require to be reported to the Charity Commission.

## PUBLICATION AND PROVISION OF THE PRIVACY NOTICE

An up-to-date version of the Privacy Notice will be made available on the School's websites, which will be reviewed and updated annually. Any substantial amends to the Privacy Notice will be provided directly to those affected within one month of starting processing.

This Privacy Notice

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 AND COMPLAINTS

Any comments or queries on this policy should be directed to either [j.sladen@effinghamschools.org](mailto:j.sladen@effinghamschools.org) or [v.low@effinghamschools.org](mailto:v.low@effinghamschools.org) or by telephone: 01372 452037; or by post: Effingham Schools Trust, Effingham Hill, Dorking, Surrey, RH5 6ST

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 complaints / grievance procedure and should also notify the Director of Operations. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the school before involving the regulator.

Updated by Victoria Low (Director of Operations) and Jane Sladen (Data Manager) **25/03/2021**