



# Great Marlow School

*Excellence • Compassion • Integrity*

## Privacy Statement

Recommended by the Leadership Team:	November 2020
Approved by the Finance & Resources Committee (or Policies Sub Committee):	November 2020
Adopted by Governing Body:	December 2020
Review Due:	Autumn Term 2021

Indicate as appropriate:

There **has been** a change to the previous policy

or

✓ There **has not been** a change to the previous policy.

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## GMS Privacy Notice

### 1.0 Introduction

This notice sets out how and why Great Marlow School (“the School” or “GMS” or “RSC”) collects personal information, and how that information is processed. This should be read alongside the school’s “Data Protection and Freedom of Information Policy”.

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing this ‘privacy notice’ (sometimes called a ‘fair processing notice’) to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals as part of the school’s business. We, Great Marlow School, are the ‘data controller’ for the purposes of data protection law.

### 1.1 Personal information

This notice covers personal information. That is information which identifies an individual (and includes information which would identify an individual to the person to whom information is disclosed because of special knowledge they have or could obtain). This includes (but is not limited to) contact details, assessment/examination results, attendance information, and some special category data, eg. characteristics such as ethnic group, special educational needs, any relevant medical information, photographs and videos.

### 1.2 Individuals

This notice is divided into 2 further sections. Section 2 contains information regarding how we handle all data generally and is relevant to all individuals. Section 3 contains specific privacy notice sections to help individuals identify how this notice applies to them, depending on where they are in their journey through school life as outlined below:

- **Staff:** Those employed by the school
- **Job Applicants:** Those seeking employment at the school
- **Volunteers:** Those who volunteer for whom we must hold data
- **Students:** Any student enrolled at GMS in years 7-13
- **Parents/Carers:** The parent / carer of a student
- **Donors:** Any of the above that donate to GMS directly or indirectly
- **Visitors:** Anyone visiting the school site
- **Contractors:** Self employed contractors providing a service to the school
- **Governors:** Members of the Governing Body of GMS (Also referred to as Trustees)

For some users, they may only fit into one category. For others it is possible that that all categories may be relevant, or that several categories may be relevant at the same time.

For example:

“An individual attended the school as a **Student**. They then left the school to go to university and started a family. They decided to set up a long term voluntary donation ( **Donor**) to the school at this time. Once back from university they visited the school as a **Visitor** and decided to **Volunteer** at the school for a year. They liked the vibe in the school so much they determined to train as a teacher with GMS and were subsequently applied for a job (**Job Applicant**) and became employed as a teacher (**Staff**).

Their eldest son soon attended the school as a pupil and they now needed to provide data to the school in their role as a **Parent.**”

For this individual, the data supplied to GMS during their history with the school will have been processed for separate purposes. This privacy notice allows them to identify how the data supplied for each purpose will be treated. By clicking on the links above this will take you to the relevant section within this document. Parents may wish to refer to the Student notice to understand how we process their child’s data.

### **1.3 Notice Review**

This policy will be reviewed the earlier of every 2 years or when major national, organisational, legislative or technological changes occur.

### **1.4 Links to other websites**

This privacy notice does not cover the links within the GMS website that link to other organisations’ websites. We encourage you to read the privacy notices on any other websites you visit.

## **2.0 General Privacy Principles**

### **2.1 Emails**

In communicating with data subjects the school may use either traditional email or use a bulk emailing provider. The school may track and record whether messages and links within emails or on our website have been opened in order to monitor interest in different news stories and tailor our communications. This technology is also used to ensure that urgent messages have been received.

### **2.2 Cookies**

The School’s intranet site uses a single cookie for authentication. Upon login, a small cookie will be stored to prevent a student or parent needing to login to each page of the site. If the ‘Remember Me’ box is ticked upon login, the cookie will be stored for a specified period of time on the individual’s computer (which will be indicated upon login). If this box is not ticked, it will be removed when the browser is closed. The School does not use cookies for any other purpose than authentication.

### **2.3 How we hold personal information**

Where we hold personal information the School is committed to:

- Keeping information safe and secure, whether that is an electronic or physical record.
- Keeping information up to date.
- Using personal information fairly at all times.
- Keeping data for no longer than it is needed; the school adheres to a retention schedule to ensure that this is the case.

Individuals can correct any information we hold that is incorrect (such as updating addresses) by calling the school reception who will direct you to the relevant department to process the change.

### **2.4 Data Security**

GMS takes the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, or subject to unauthorised access. Where necessary, we implement appropriate network access controls, user permissions and encryption to protect data.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

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

Where we share data with an organisation that is based outside the European Economic Area, we will protect your data by following data protection law.

## **2.5 General Data Enquiries**

As an Academy School, an employer, a registered company and as a registered charity, the school holds a wide range of data that is either educational and non-educational. For general enquires regarding what systems are used, what data is held and how these can be accessed, stored or shared then the first point of contact is the school's Business Manager Mark Ballard and is contactable via email on [mballard@gms.bucks.sch.uk](mailto:mballard@gms.bucks.sch.uk).

## **2.6 Data Protection Officer**

The school's Data Protection Officer is Nicola Cook, Bucks County Council and is contactable via email on [dpo@gms.bucks.sch.uk](mailto:dpo@gms.bucks.sch.uk). In the event that you wish to find out whether we hold any information about you, you should contact the DPO in the first instance.

## **2.7 Your Rights**

### **2.7.1 How to access personal information we hold about you**

You can find out if we hold any personal information about you, and how we use it, by making a '**subject access request**'. Please note that in a minority of situations certain classes of data may not be disclosed during a subject access request (for example if it would lead to safeguarding issues).

If we do hold information about you, we will:

- Give you a description of it
- Tell you the rights you have in connection with accessing your data
- Tell you why we are holding and using it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)
- Give you a copy of the information

You may also ask us to send your personal information to another organisation electronically in certain circumstances. If you want to make a request please contact our DPO.

### **2.7.2 Your other rights over your data**

You have other rights over how your personal data is used and kept safe, including the right to:

- Say that you don't want it to be used if this would cause, or is causing, harm or distress
- Stop it being used to send you marketing materials
- Say that you don't want it used to make automated decisions (decisions made by a computer or machine, rather than by a person)
- Have it corrected, deleted or destroyed if it is wrong, or restrict our use of it

- Claim compensation if the data protection rules are broken and this harms you in some way

## 2.8 Complaints

We take any complaints about our collection and use of personal information very seriously.

**If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance by contacting our Data Protection Officer.**

If you are not satisfied with the resolution to your complaint, you can make a complaint to the Information Commissioner's Office:

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

## 3.0 Privacy Notices

### 3.1 Staff

#### 3.1.1 Summary

GMS collects and processes personal information about staff before, during and after your period of employment with us. We are committed to being transparent about how we collect and use your data.

#### 3.1.2 The personal data we hold

We process data relating to those we employ, or otherwise engage, to work at our school.

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Qualifications and employment records, including work history, job titles, working hours, training records, teacher number and professional memberships
- Performance information, such as training records and Professional Development Reviews
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence
- Photographs



- CCTV footage
- Data about your use of the school's information and communications system

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Health, including any medical conditions, and sickness records

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

### **3.1.3 Why we use this data**

The purpose of processing this data is to help us run the school, including to:

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body

### **3.1.4 Our lawful basis for using this data**

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

Where we are required to have your consent and you have provided us with this consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so. Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

### **3.1.5 How we store, access and protect your data**

We create and maintain an employment file for each staff member. The information contained in this file is kept secure with appropriate security measures in place. It is only used for purposes directly relevant to your employment and accessed by those staff authorised to do so.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our record retention schedule.

### **3.1.6 Data sharing**

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- The Department for Education - for performance management purposes
- Your family or representatives – should we need to contact them in an emergency
- Our regulator Ofsted – for inspection and monitoring purposes
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll
- Other bodies such as HMRC, Teachers Pensions or the Local Government Pension Scheme
- Our auditors – to enable them to provide the service we have contracted them for
- Survey and research organisations – to enable them to provide the service we have contracted them for.
- Professional advisers and consultants – to enable them to provide the service we have contracted them for
- Charities and voluntary organisations – to support the education of students at Great Marlow School
- Police forces, courts, tribunals – when we are legally obliged to do so.
- Professional bodies – to support professional development activities.

### **3.1.7 How Government uses your data**

We are required to share information about our school employees with the DfE under Section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations (2007) and subsequent amendments. The workforce data that we lawfully share with the DfE through data collections:

- informs departmental policy on pay and the monitoring of the effectiveness and diversity of the school workforce
- links to school funding and expenditure
- supports 'longer term' research and monitoring of educational policy Data collection requirements

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

*Sharing by the Department*

The Department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested
- the arrangements in place to securely store and handle the data

To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

To contact the department: <https://www.gov.uk/contact-dfe>

## **3.2 Job Applicants**

### **3.2.1 Summary**

GMS collects and processes personal information about Job Applicants when they apply for a position at the School. We are committed to being transparent about how we collect and use your data.

### **3.2.2 The personal data we hold**

We process data relating to those applying to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Copies of right to work documentation
- References
- Evidence of qualifications
- Employment records, including work history, job titles, training records and professional memberships

We may also collect, store and use information about you that falls into “special categories” of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Disability and access requirements

### **3.2.3 Why we use this data**

The purpose of processing this data is to aid the recruitment process by:

- Enabling us to establish relevant experience and qualifications
- Facilitating safe recruitment, as part of our safeguarding obligations towards pupils

- Enabling equalities monitoring
- Ensuring that appropriate access arrangements can be provided for candidates that require them

### **3.2.4 Our lawful basis for using this data**

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)
- We have legitimate interests in processing the data

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

### **3.2.5 How we store, access and protect your data**

We create a file for each prospective staff member. The information contained in this file is kept secure with appropriate security measures in place. It is only used for purposes directly relevant to your potential employment and accessed by those staff authorised to do so.

When personal data we collect as part of the job application process is no longer required we will delete your information in accordance with our Records Retention Schedule.

### **3.2.6 Data sharing**

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about you with:

- Our local authority – to meet our legal obligations to share certain information with it, such as shortlists of candidates for a headteacher position
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as HR and recruitment support
- Professional advisers and consultants – to enable them to provide the service we have contracted them for
- Police forces, courts, tribunals – when we are legally obliged to do so
- Employment and recruitment agencies

### **3.3 Volunteers**

#### **3.3.1 Summary**

GMS collects and processes personal information about volunteers during and after your relationship with us to manage that relationship. We are committed to being transparent about how we collect and use your data.

#### **3.3.2 The personal data we hold**

We process data relating to those we employ, or otherwise engage, to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Curriculum Vitae or other profiles
- Next of kin and emergency contact numbers
- Information gathered from business and social media sources in the public domain, eg LinkedIn, Facebook
- References, and where relevant DBS checks
- Information on special requirements, health or medical conditions
- Information relating to project monitoring, such as the number of hours spent on a project
- Information related to availability or periods of unavailability

#### **3.3.3 Why we use this data**

The purpose of processing this data is to help us run the school, including to:

- Facilitate safe recruitment of volunteers, as part of our safeguarding obligations towards students
- Enable ethnicity and disability monitoring
- Support the work of staff and students at Great Marlow School

#### **3.3.4 Our lawful basis for using this data**

There are a range of lawful reasons for holding your personal data, which include: legal obligation; public interest; and contractual basis.

#### **3.3.5 How we store, access and protect your data**

We create a file for each volunteer. The information contained in this file is kept secure with appropriate security measures in place. It is only used for purposes directly relevant to your role as a volunteer and accessed by those staff authorised to do so.

GMS considers its relationship with volunteers to be long-term. This means that we will maintain a record for you until such time as you tell us that you no longer wish us to keep in touch. In this instance we will delete the majority of your personal data, but will maintain basic personal data to ensure that we do not inadvertently create a new record in the future.

### **3.3.5 Data Sharing**

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about you with:

- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Professional advisers and consultants – to enable them to provide the service we have contracted them for
- Police forces, courts, tribunals – when we are legally obliged to do so

## **3.4 Students**

### **3.4.1 Summary**

GMS collects and processes personal information about students whilst they study at the school. This is to support students academically and safeguard them. We are committed to telling you about how we collect and use your data.

### **3.4.2 The personal data we hold**

We hold some personal information about you to make sure we can help you learn and look after you at school. While in most cases you, or your parents/carers, must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data. We will always tell you if it's optional. If you must provide the data, we will explain what might happen if you don't.

In order to help you, we may also get information about you from some other places too – like other schools, the local council and the government.

This information may include, but is not restricted to:

- Your contact details
- Your test results
- Your attendance records
- Your characteristics, like your ethnic background or any special educational needs
- Any medical conditions or allergies you have
- Details of any behaviour issues or exclusions
- Photographs
- CCTV images
- Data about your use of the school's information and communications system
- Safeguarding information (such as Court Orders or Professional Involvement from others)
- Any information about any Special Educational Needs you may have

### **3.4.3 Why we use this data**

We use this data to help run the school, including to:

- Get in touch with you and your parents when we need to

- Check how you're doing in exams and work out whether you or your teachers need any extra help
- Track how well the school as a whole is performing
- Look after your wellbeing
- Make personal data, including sensitive personal data, available to staff for planning curricular or extra-curricular activities
- Where relevant, to keep you previous school informed of your academic progress and achievements.
- To meet the statutory duties we have to provide information to the Department for Education

#### **3.4.4 Our lawful basis for using this data**

We will only collect and use your information when the law allows us to. Most often, we will use your information where:

- We need to comply with the law
- We need to use it to carry out a task in the public interest (most obviously, in order to provide you with an education)

Sometimes, we may also use your personal information where:

- You, or your parents/carers have given us permission to use it in a certain way
- We need to protect your interests (or someone else's interest)

Where we have permission to use your data, you or your parents/carers may withdraw this at any time. We will make this clear when we ask for permission, and explain how to go about withdrawing permission.

Some of the reasons listed above for collecting and using your information overlap, and there may be several grounds which mean we can use your data.

#### **3.4.5 How we store, access and protect your data**

We will create a file for every student at the school. The information contained in this file is kept secure with appropriate security measures in place.

We will keep personal information about you while you are a pupil at our school. We will also keep it after you have left the school, where we are required to by law.

We have a record retention schedule which sets out how long we must keep information about pupils. Currently core student records are kept until the end of the academic year in which you turn 25.

#### **3.4.6 Data sharing**

We do not share personal information about you with anyone outside the school without permission from you or your parents/carers, unless the law and our policies allow us to do so.

Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you with:

- Our local authority – to meet our legal duties to share certain information with it, such as concerns about pupils' safety and exclusions
- Your family and representatives - where it is in their legitimate interest
- Educators and examining bodies – so that they can provide the services with have contracted them for

- Our regulator OFSTED that supervises us – to monitor the schools’ performance
- Suppliers and service providers – so that they can provide the services we have contracted them for
- Health authorities – where we have a statutory obligation to do so
- Health and social welfare organisations - where we have a statutory obligation to do so
- Police forces, courts, tribunals – where we have a statutory obligation to do so
- Schools that you may attend if you leave GMS before you reach the end of Year 13
- The Department for Education (please see below)

### **3.4.7 Department for Education - National Pupil Database**

We are required to provide information about you to the Department for Education (a government department) as part of data collections such as the school census.

Some of this information is then stored in the [National Pupil Database](#) , which is managed by the Department for Education and provides evidence on how schools are performing. This, in turn, supports research.

The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards and others.

The Department for Education may share information from the database with other organisations which promote children’s education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data.

You can find more information about this on the Department for Education’s webpage on [how it collects and shares research data](#) .

You can also [contact the Department for Education](#) if you have any questions about the database.

### **3.4.8 Youth support services**

Once you reach the age of 13, we may pass your information to our local authority and or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- youth support services
- careers advisers
- post-16 education and training providers

Where information is shared, it is limited to your name, address and date of birth. However if your parent or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the you once you reach the age 16 .

For more information about services for young people, please visit the local authority website [here](#) .

## **3.5 Parents / Carers**

### **3.5.1 Summary**

Great Marlow School (GMS) aims to support students attending the school. In order to do this, we will hold personal data on parents and carers to support their child’s learning and well-being. We will also seek support from parents and carers to further the activities of the school. Such support may be in-kind (eg help with Career’s Education or School Events) or financial.



In order to communicate with parents effectively by email, email addresses will be uploaded onto our bulk email provider. In order to communicate with parents effectively by post or telephone, names, telephone numbers and postal addresses will be uploaded onto school databases.

### **3.5.2 The personal data we hold**

As a parent of a student at GMS we hold items of personal data about you. This personal data will have been collected from you when you enrolled your child at GMS. It will include:

- Your name and title
- Your home address, email address and telephone numbers
- Information about your current employment if you have chosen to tell us
- Information indicating if you or your company would be willing to support the school with Career's Education or through Advertising at events or in the School Magazine
- Information about your child/children (please see student and alumni privacy policies)

We also record information on payments made for services provided to benefit students at GMS. This may include payment for music lessons, concert or play tickets or for non-curricular school trips. We will also hold information on voluntary contributions made for school trips, visits and extra-curricular activities. Where you make a donation to the Educational Trust the data you provide to enable us to collect this donation will be subject to our donor privacy policy (Section 3.7).

### **3.5.3 Why we use this data**

Personal data is used to:

- Update parents on school news and events which may be of interest to them or their child
- Send progress reports of achievement regarding your child
- Recruit parent volunteers
- Make fundraising appeals by email, direct mail, telephone and face-to-face meetings and ensure that we only send you communications about events or fundraising appeals that would be of interest to you.

### **3.5.4 Our lawful basis for using this data**

There are a range of lawful reasons for holding your personal data, which include: legal obligation; public interest; and contractual basis.

Where we seek support of any kind from parents, we use legitimate interest as the legal basis for these communications.

### **3.5.5 How we store, access and protect your data**

Personal data of parents is stored on school databases. Access to personal data is restricted to those members of staff who have a requirement to maintain a relationship with you, and is controlled through password protection and user security profiles. All school employees, contractors and volunteers who are given access to personal data receive mandatory Data Protection training and have a contractual responsibility to maintain confidentiality.

GMS considers its relationship with parents to last for at least as long as they have a child attending GMS. This means that we will maintain a record for you until such time as your child leaves the school, unless you tell us otherwise. Please note that we are required to keep some financial data for longer periods than this.

### **3.5.6 Who we share personal data with**

We will share your data with our in-house catering company, to enable your child to make use of the cashless catering facilities at the school.

We will also share your data with companies we work with to provide services to benefit students at GMS. An example would be a company who we engage to organise a school trip or a company who we engage to take student or whole school photographs.

We do not disclose personal data to third parties or Government agencies unless the law requires us to do so or exigent circumstances require us to protect the safety of our users or the public.

## **3.6 Donors**

### **3.6.1 Summary - The School and Friends of Great Marlow**

This privacy notice explains how we use your data, how you can control the way in which we use that data and what actions you can take if you would like to change the way in which your data is being used. Donations to Great Marlow School are received to benefit students at Great Marlow School. These donations are processed by Friends of Great Marlow, a registered charity (#####). To manage its records, a database is utilised.

### **3.6.2 How we gather information**

Data is collected and updated from information provided by donors when making a donation.

In some cases, we may supplement the information you have given us with data from elsewhere. Examples could include conducting appropriate due diligence to safeguard the reputation of Great Marlow School in the case of significant financial transactions.

Sources of data could include information gathered from a news article, online media, or publically available directories or Companies House. The data we collect in relation to donors may include :

- Your bank account number, name and sort code (used for processing Direct Debits/Standing Order Mandates)
- Gift amount, purpose, date and method of payment including cheque numbers or payment references
- Tax status and Gift Aid Declaration information
- Your spouse/partner's name
- Your contact details
- Record of verbal or email conversations/meetings including any personal interests which relate to financial gifts made to the school

### **3.6.3 What we do with your data and our responsibilities**

The law requires us to tell you the lawful basis upon which we process your data.

The personal details held about you will only be used to process your donation and update you on projects you have donated to or expressed an interest in. Your data will be shared with Friends of Great Marlow School (Registered Charity No #####) to enable us to process donations in line with our financial regulations.

Many activities are carried out to fulfil an agreement, e.g. the processing of a donation.

FoGMS will not share your data with third parties except where there is a legal obligation to do so, e.g. if you Gift Aid a donation, then we are required to tell HMRC the name and address of the donor and the date and amount of the donation. Our auditors will also inspect our records to ensure that donations are processed in line with the wishes of a donor.

In all other cases, the law allows us to process your data if it is in our legitimate interests to do so, provided such processing is not overridden by your 'interests or your fundamental rights and freedoms'. Practically speaking, this means that we carry out an exercise to check that we will not cause you harm by processing your data, that the processing is not overly intrusive and that we will only do so in a way which is described in the Privacy Notice.

#### **3.6.4 Protecting your data**

Your data is kept securely with appropriate security measures in place.

#### **3.6.5 How long do we keep your data**

We will keep your data for as long as is needed to complete the task for which it was collected. Relationships between donors and a school are often long term ones, and so we expect to keep your data for as long as that relationship exists. Please note that we are legally obliged to keep certain types of data (eg. finance and gift aid) for specified periods of time.

#### **3.6.6 Data Sharing**

Your data will not be shared with any other third party (except FoGMS) unless there is a statutory reason for us to do so.

### **3.7 Visitors**

#### **3.7.1 Summary**

GMS collects and processes personal information about visitors. We are committed to being transparent about how we collect and use your data.

#### **3.7.2 The personal data we hold**

The categories of visitor information that we collect, hold and share include:

- Personal information - such as name and photograph
- CCTV

Whilst the majority of visitor information you provide to us is mandatory, some of it is provided to us on a voluntary basis. We will inform you whether you are required to provide certain visitor information to us or if you have a choice in this.

#### **3.7.3 Why we use this information**

We use the visitor data:

- to safeguard pupils
- to meet Health and Safety Legislation
- to meet Fire in the Workplace Legislation
- to keep the site secure and safe
- to assist with the organisation of events and meetings

#### **3.7.4 Our lawful basis on which we use this information**

We collect and use visitor information on the following bases:

- Public Interest - to support the learning and teaching of the school community
- Legal Obligation – to keep our pupils safe in terms of safeguarding

- Legal Obligation – meeting H&S and Fire in the Workplace Legislation
- Legal Obligation – meeting Safeguarding Legislation
- Contractual Basis - to fulfil a contract, eg. the letting of the school premises

### **3.7.5 How we store, access and protect your data**

We store visitor data in the following ways:

- ~~Our visitor signing-in system~~
- Fire Register
- CCTV system

Your data is kept securely with appropriate security and access measures in place.

### **3.7.6 Who we share visitor information with**

We may share visitor information with:

- Our visitor signing-in system provider
- The police
- Insurance companies
- HSE - for accident reporting
- Any requests from third parties in the event of a safeguarding incident

We do not share information about visitors with anyone without consent unless the law and our policies allow us to do so.

## **3.8 Contractors (Self Employed)**

### **3.8.1 Summary**

GMS collects and processes personal information about contractors. We are committed to being transparent about how we collect and use your data.

### **3.8.2 The personal data we hold**

We process data relating to those we contract, or otherwise engage, to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Photographs
- CCTV footage

- Data about your use of the school's information and communications system
- Evidence of DBS checks

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Where you have provided us with consent to use your data for non-mandatory purposes, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

### **3.8.3 Why we use this data**

The purpose of processing this data is to help us run the school, including to:

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Allow better financial modelling and planning

### **3.8.4 Our lawful basis for using this data**

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

### **3.8.5 How we store, access and protect your data**

We create and maintain a file for each contract. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

Once the contract with us has ended, we will retain this file and delete the information in it in accordance with our record retention schedule.

### **3.8.6 Data sharing**

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- Your family or representatives – should we need to contact them in an emergency
- Our regulator Ofsted – for inspection and monitoring purposes
- Where appropriate (e.g. IR35) our payroll provider and HMRC

- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll
- Our auditors – to enable them to provide the service we have contracted them for
- Professional advisers and consultants – to enable them to provide the service we have contracted them for
- Police forces, courts, tribunals – when we are legally obliged to do so

### **3.9 Governors**

#### **3.9.1 Summary**

GMS collects and processes personal information about Governors during and after your relationship with us to manage that relationship. We are committed to being transparent about how we collect and use your data.

#### **3.9.2 The personal data we hold**

We process data relating to those we employ, or otherwise engage, to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Information required for statutory purposes such as registers of pecuniary interest that you or other members of your household may have in relation to school business, and information required to be provided to the DFE. This may include the following:
  - Contact details
  - Curriculum Vitae or other profiles
  - Next of kin and emergency contact numbers
  - References, and where relevant DBS checks
  - Information related to availability or periods of unavailability

#### **3.9.3 Why we use this data**

The purpose of processing this data is to help us run the school, including to:

- Facilitate safe recruitment of Governors, as part of our safeguarding obligations towards students
- Enable ethnicity and disability monitoring
- Support the work of staff and students at Great Marlow School
- To meet statutory requirements

#### **3.9.4 Our lawful basis for using this data**

There are a range of lawful reasons for holding your personal data, which include: legal obligation; and public interest.

#### **3.9.5 How we store, access and protect your data**

We create a file for each Governor. The information contained in this file is kept secure with appropriate security measures in place. It is only used for purposes directly relevant to your role as a Governor and accessed by those staff authorised to do so.

GMS considers its relationship with Governors to be long-term. This means that we will maintain a record for you until such time as you tell us that you no longer wish us to keep in touch. In this instance we will delete the majority of your personal data, but will maintain basic personal data to ensure that we do not inadvertently create a new record in the future.

### **3.9.6 Data Sharing**

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

However, it is a legal requirement that your name will be published on the School Website and the Statement of Accounts and that your information is shared as follows:

- Companies House - to enable the School to be managed and run
- With our Auditors - to enable the financial monitoring of the School as is required by law
- Any other party required as required by the DFE

Where it is legally required, or necessary (and it complies with data protection law), we may also share personal information about you with:

- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Professional advisers and consultants – to enable them to provide the service we have contracted them for
- Police forces, courts, tribunals – when we are legally obliged to do so