Immanuel College
Privacy Policy
The Charles Kalms Henry Ronson Immanuel College ("The College") is registered with the Information Commission's Office as the Data Controller (registration number Z7270271). The Data Protection contact at the College is Antony Berkin bursar@immanuelcollege.co.uk

Overview
In order to carry out its ordinary duties to Governors, staff, pupils and parents, the College collects and processes personal data about individuals (including current, past and prospective staff, pupils or parents) as part of its daily operation.

The information in this Privacy Notice is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used.

Some of this activity the College 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.

Other uses of personal data will be made in accordance with the College'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 College may also collect, process and store in the short term data pertaining to job applicants and contractors. The legal basis for processing and storing this information is legitimate business interest.

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

- any contract between the College and its staff or the parents/guardians of pupils;
- the College's policy on taking, storing and using images of children;
- the College's CCTV policy;
- the College's retention of records policy;
- the College's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the College's IT policies, including its Acceptable Use agreement and E-Safety Policy.
Types of personal data collected and held by the College and method of collection

When you request information from the College, we will require some personal information about you - including your name, address, email address and telephone number. This information allows the College to fulfil your request and keep you informed. This may be provided by you or third parties electronically or on paper. Where payments are made to the College by debit cards, details of payment card numbers and expiry dates will never be recorded or retained by the College. Where payments are made to the College by BACs collection, details are retained securely on the College’s systems and processed by a third party payment processor.

If you are a parent, some of the personal information held about you will include:-
- Your name, title, gender, nationality and date of birth.
- Your home address, email address and telephone numbers;
- Your bank account number, name and sort code (used for processing Direct Debits);

If you are a student, former student or prospective student, some of the personal information held about you will include:-
- Your name, title, gender, nationality and date of birth;
- Your home address, email address and telephone numbers;
- Start date, previous academic record, references, relevant medical information, attendance data, disciplinary records, learning support information, examination scripts and marks.
- Images including the image stored on the College's Management of Information system, images of you engaging in College activities and images captured by the College's CCTV system (in accordance with the College's policy on taking, storing and using images of children).

If you are a member of the alumni body, some of the personal information held about you will include:-
- Your name, title, gender, nationality and date of birth.
- Your home address, email address and telephone numbers;
- Your employment status (e.g. part-time, full-time, retired);
- Academic records and dates of your time at the College.
- Your current job title and work email address;
- Your previous role(s) and job title;
- Your links with the College.

Immanuel College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all pupils fulfil their potential.
Why the College needs to process personal data:

The College expects that the following uses may fall within that category of its (or its community's) "legitimate interests":

- For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents);
- To provide education services, including musical education, physical training or spiritual development, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Maintaining relationships with alumni and the College community, including direct marketing or fundraising activity;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as diversity or gender pay gap analysis and taxation records);
- To enable relevant authorities to monitor the College's performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past, current and prospective pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended 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 College;
- To safeguard pupils' welfare and provide appropriate pastoral care;
- To monitor (as appropriate) use of the College's IT and communications systems in accordance with the College's IT acceptable use policy;
- To make use of photographic images of pupils in College publications, on the College website and (where appropriate) on the College's social media channels in accordance with the College's policy on taking, storing and using images of children;
- For security purposes, including CCTV in accordance with the College's CCTV policy; and
- Where otherwise reasonably necessary for the College's purposes, including to obtain appropriate professional advice and insurance for the College.

In addition, the College may need to process special category personal data (for example, to support student welfare) 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 may 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 where it is in the individual's interests to do so; for example for medical advice, social services, insurance purposes or to organisers of College trips;
- To provide educational services in the context of any special educational needs of a pupil;
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

How personal data is processed by the College and who has access to your personal data.

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 College staff that are given access to personal data receive mandatory Data Protection training and have a duty to maintain confidentiality under GDPR. Access to special category data is restricted to key personnel and staff with such access receive a higher level of training. For example:

- medical records are held and accessed by the College first aid officer
- safeguarding files are restricted to the Head and the Deputy Head Pastoral (the Designated Safeguarding Lead (“DSL”) for the senior school and Head of Preparatory school (the Designated Safeguarding Lead (“DSL”) for Preparatory school ) and their respective deputies
- pastoral files are restricted to the Heads of Year and Deputy Head Pastoral

However, the above information may be shared confidentially with other members of staff on a “need to know” basis to keep pupils safe.

Learning support information, which may include special category data, is shared in part with staff in the context of providing the necessary care and education that the pupil requires.

Personal data is processed by IC to:

- Keep you informed of your progress (students) or to keep you informed about your child’s progress (parents).
• Promote events;
• Send news and updates;
• Recruit alumni volunteers and mentors;
• Provide community news

There is no automated decision making or profiling with data received into and through the College.

With whom does the College share data?
Personal data is never sold to third parties. The College will share your data with the following companies/organisations who have contracts with the College and who have equaled the College’s precautions and systems for dealing with data, these are:
- PSA
  The College photographer
  Health care service provider
  IT contractors
  IT software providers
  Professional advisers (lawyers and accountants)
  Relevant authorities including HMRC, the police or the local authorities

Data is shared with the PSA as a contractual necessity and for legitimate interest purposes. In many circumstances we will not disclose personal data without consent. However, there may be occasions, such as pupils changing schools, when we will need to share personal information with the organisation concerned and with other relevant bodies.

Information about employees may also be disclosed where required by law, or in connection with legal proceedings, or for the prevention / detection of crime, or assessment / collection of tax.

The College is required to disclose some personal data to the Department of Education, for example, students continuing with sixth form studies data.

If you have registered to attend an event organised by the College or the PSA, the College may share the list of attendee names with participants.

The College may share personal data with third party organisations which carry out contracts on behalf of the College. IC will only share personal data that is relevant and proportionate. All data processing activities are logged and reviewed from time to time. Should a safeguarding issue arise, personal data may be shared after consultation with the Designated Safeguarding Lead (“DSL”).
Finally, in accordance with Data Protection Law, some of the College'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 College's specific directions.

How personal data is stored by IC

Personal data is stored electronically in the College's MIS, IT Systems and, in some instances, in paper record. Paper record special category data and higher category sensitive information is kept under lock and key.

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the school organises. Should this be envisaged for children, parents will be contacted for their consent. The consent will be limited in time and content if required.

**How long personal data is held by the College**

IC has a data retention policy. Please note that this is subject to periodical revision and the current moratorium - on the destruction of files (International Inquiry into Child Sexual Abuse) means data is being retained that would otherwise have been destroyed. If you have any specific queries or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact bursar@immanuelcollege.co.uk

**Your rights**

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the College, and in some cases ask for it to be erased or amended or for the College to stop processing it, but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, should email their request to bursar@immanuelcollege.co.uk

The College 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 one month in the case of Subject Access Requests. The College will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, the College may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows it.
You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal professional privilege. The College is also not required to disclose any pupil examination scripts (though examiners' comments may fall to be disclosed), nor any confidential reference given by the College for the purposes of the education, training or employment of any individual.

Pupils can make Subject Access Requests for their own personal data, provided that, in the reasonable opinion of the College, they have sufficient maturity to understand the request they are making (see section Whose Rights below). Indeed, while a person with parental responsibility will generally be expected to make a subject access request on behalf of younger pupils, the information in question is always considered to be the child's at law. A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf, and moreover (if of sufficient age) their consent or authority may need to be sought by the parent. Pupils aged 13 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. Children younger than 13 may be sufficiently mature to have a say in this decision.

All subject access requests from pupils will therefore be considered on a case by case basis.

Where the College 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). Please be aware however that the College may 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 has been requested).

The rights under Data Protection Law belong to the individual to whom the data relates. However, the College will often rely on parental consent to process personal data relating to pupils (if consent is required) unless, given the nature of the processing in question, and the pupil’s age and understanding, it is more appropriate to rely on the pupil's consent.

Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.
In general, the College 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, unless, in the College's opinion, there is a good reason to do otherwise.

However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the College may be under an obligation to maintain confidentiality unless, in the College's opinion, there is a good reason to do otherwise; for example where the College 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 College's Acceptable Use Policy and the College rules. Staff are under professional duties to do the same, which is covered in the detailed staff privacy statement.

Data Accuracy and Security
The College will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible.

Individuals must please notify the College of any changes to information held about them (please e-mail bursar@immanuelcollege.co.uk).

An individual has the right to request that any inaccurate or out-of-date information about them is erased or corrected (subject to certain exemptions and limitations under Act) - please see above.

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

Links to other websites
This privacy notice does not cover the links within this site linking to other websites. We encourage you to read the privacy statements on the other websites you visit.

Queries and Complaints
Any comments or queries on this policy should be directed to the College at bursar@immanuelcollege.co.uk.
If an individual believes that the College has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the College's complaints procedure and should also notify the College by email bursar@immanuelcollege.co.uk

You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO.org.uk), although the ICO recommends that steps are taken to resolve the matter with the College before involving the regulator. The ICO helpline is 0303 123 1113. A template letter addressed to the College, should you need it, can be requested from the College by e-mail bursar@immanuelcollege.co.uk

Changes to this privacy notice
We keep our privacy notice under regular review.

This privacy notice was last updated on 26th September 2019.