



THE ORATORY

PRIVACY NOTICE - CURRENT PARENT AND PUPIL

INTRODUCTION

The Oratory School is a registered charity. Our registered charity number is 309112. We take our responsibilities as a data controller seriously and we are committed to using the personal data we hold in accordance with the law.

This privacy notice provides detailed information about how we process personal data. Please read it carefully and, if you have questions regarding your personal data or its use, please contact the Bursar who is the School's Information Security Officer (ISO) by email on bursary@oratory.co.uk, by telephone on 01491 683600; or by post at The Oratory School, Woodcote, South Oxfordshire RG8 0PJ.

This privacy notice is also sent to parents alongside the Acceptance Form and Terms and Conditions ("Parent Contract"), signed on acceptance to the School. It is reviewed and may be updated periodically to ensure compliance with legislation and reflect changes in school practices.

For the purposes of Data Protection Law (the UK Data Protection Bill and the General Data Protection Regulation) the School is the Data Controller of Personal Data about pupils and their parents and/or guardians. In the main (unless otherwise specified below), the School's basis for processing your and your child's personal data is as a result of either a contractual obligation under the Parent Contract or as a result of legitimate interest – in other words, the School requires this information in order to carry out its ordinary duties.

PERSONAL DATA PROCESSED BY US INCLUDES:

- names, dates of birth, nationality and contact details;
- where appropriate, medical / health or financial information;
- national curriculum and other assessment information;
- attendance records;
- information relating to special educational needs or disabilities;
- previous school(s) information, including references and assessment data;
- images of pupils;
- in relation to parents and/or guardians, name, address, email, telephone numbers, occupation, marital status, parental responsibility status and identity (passport in most cases) and visa status (if required as part of our obligations as a UKVI Sponsor). Some of this data is classified as Special Category Personal Data (sometimes called 'sensitive data' as defined in the School's Data Protection policy) such as information about parents' and / or pupils' ethnic group, religious beliefs, financial and relevant medical information.

The legal basis for processing this information is usually in order to adequately safeguard the interests of your child but this information may also be processed in order to protect

their vital interests or as a result of a legal obligation or because a parent has supplied this information (for a bursary application for instance).

We acquire Personal Data in a number of ways. For example, parents of pupils may provide us with Personal Data about themselves or their family in correspondence, forms, documents, during discussions with staff, and through our website. Every form completed by a parent or child containing personal data will be held in accordance with the School's Data Protection Policy.

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 transport, 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 **KCSIE**) 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 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 CHECK FORM

Each academic year, a data check form is sent to parents and pupils (either electronically or in hard copy) that asks for personal data to be checked and data preferences to be updated. It is vitally important that this is completed by parents and pupils to ensure that the School maintains accurate records.

How we use your Personal Data

We commonly use Personal Data for:

- Ensuring that we provide a safe and secure environment;
- Making decisions relating to admissions, bursaries and scholarships
- The safeguarding of pupils' welfare and provision of pastoral care, welfare, health care services by school staff in boarding houses;
- Compliance with legislation and regulation including the preparation of information for inspections by the Independent Schools Inspectorate, submission of annual census information to each of the Independent Schools Council, Department for Education and Catholic Education Service;
- Providing education and learning for children; including the provision of educational support and related services to pupils (and parents) including the maintenance of discipline; provision of careers and library services; administration of sports fixtures and teams, school trips; provision of the school's ICT and communications system and virtual learning environment (and monitoring the same) all in accordance with our ICT policies;
- The provision of education to pupils including the administration of the school curriculum and timetable; monitoring pupil progress and educational needs; reporting on the same internally and to parents; administration of pupils' entries to public examinations, reporting upon and publishing the results; providing references for pupils (including after a pupil has left);
- Enabling pupils to take part in exams and assessments and to monitor and report on pupils' progress and educational needs;
- Providing additional activities for children and parents, such as extra-curricular clubs and educational trips and visits;
- Protecting and promoting our interests and objectives, including fundraising;
- Safeguarding and promoting the welfare of children;
- Legal and management purposes and fulfilling our contractual and other legal obligations (including our obligations as a UKVI Sponsor)
- We may share Personal Data with third parties where doing so complies with Data Protection Law.
- The promotion of the Schools through their own websites, through a prospectus or other publications and communications (including through our social media channels); and

For example, we may share personal data:

- With relevant statutory agencies or authorities (e.g. for safeguarding reasons or in order to comply with our reporting obligations);
- Where necessary in connection with learning and extracurricular activities and trips undertaken by pupils;
- When a reference or other information about a pupil or ex-pupil is requested by another educational establishment or employer to whom they have applied;
- To enable pupils to take part in national and other assessments;
- To obtain professional advice and insurance for the School;
- Where otherwise required by law or where reasonably necessary for the operation of the School;
- We may also share information about a pupil with their parents where permitted by data protection law, e.g. information about the pupil's academic attainment, behaviour and progress;
- We may need to share special category data (medical for instance), in order to safeguard students' vital interests and welfare, to provide appropriate pastoral 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 vital interests to do so: for example for emergency medical advice or

treatment, to insurance providers or to schools or individual host families caring for our pupils;

- When using the school medical centre, we will routinely share details of any physical injury and medication administered with a pupil's parents. Where a pupil contacts the medical centre for other issues, they will normally be asked for consent to share that information with their parents (however, in the case of any potential safeguarding concern, the pupil will not be promised confidentiality).

BIOMETRIC INFORMATION, PHOTOGRAPHS & CCTV

We currently use biometric data (e.g. fingerprint identification systems) for school administration purposes (access to buildings, cashless purchasing etc) Please refer to our Biometric Policy (If you require a copy of this Policy, please email the Bursar on bursary@oratory.co.uk)

We use CCTV recordings for the purposes of crime prevention and investigation and also in connection with our obligation to safeguard the welfare of pupils, staff and visitors to our site. CCTV recordings may be disclosed to third parties but only where such disclosure is in accordance with data protection law. Staff and pupils are also reminded that although the primary purpose of the School's CCTV system is the detection and prevention of crime, any evidence of misconduct captured incidentally on these cameras can be used as evidence in disciplinary matters. There will be no routine monitoring of data captured by CCTV for disciplinary purposes but in the event of an incident or allegation in relation to a visitor, pupil or member of staff, any existing footage may be reviewed if relevant to the allegations.

We may use photographs (and occasionally other media such as video or sound recordings) of pupils for educational purposes or in our publications, including on the school website and on social media, for marketing and promotion purposes. We may also share photographs and other media with third parties for these purposes (for example, for publication in a local or national newspaper). Consent will be sought for the use of photos in line with the Taking and Storing Images of Children Policy (available on the School website).

FEES

We may make enquiries of pupils' previous schools for confirmation that all sums due and owing to such schools have been paid. We may also inform other schools or educational establishments to which pupils are to be transferred if any of our fees are unpaid.

DATA RETENTION

Personal data will be stored securely and not be kept for any longer than required for the School's legitimate or lawful purposes. Some records have to be retained for minimum periods by law.

We retain personal data only for a legitimate and lawful reason and only for so long as necessary or required by law. We have adopted Records Retention Guidelines which set out the time period for which different categories of data are kept. Currently we retain all pupil files beyond the stated age of 25 years from birth, given conflicting advice regarding the ongoing Independent Inquiry into Child Sexual Abuse.

As a general rule, when personal data is no longer needed for the purposes for which it was collected, your data will be securely and permanently destroyed as soon as practicable.

The School, as one of the oldest schools in England, maintains a school archive of historical interest. This means that some data that is used for research purposes (and that is compatible with the purposes for which the data was originally collected) may be kept indefinitely if the relevant conditions apply.

For more information on the School's data retention policy or on how long it stores certain types of personal data, please contact the Bursar (bursary@oratory.co.uk).

ALUMNI AND ORATORY SCHOOL COMMUNITY

We share your contact details and information about your involvement with the School with the Development and Alumni Relations Office and the Schools Parent Committee (FOS). The Development and Alumni Relations Office forms part of the School and exists to support the Oratory Community with events, communications and fundraising initiatives. The Development and Alumni Relations Office has its own Privacy Notice that explains more fully how it uses data belonging to alumni and the Oratory School community (including current and former parents, governors, staff and friends). This is available on the School website.

YOUR RIGHTS

The rights under Data Protection legislation belong to the individual to whom the data relates. However, we 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, we 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 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 and expressly withholds their agreement to their personal data being disclosed to their parents, we may be under an obligation to maintain confidentiality unless, in our 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 is required by law.

Pupils can make subject access requests for their own personal data, provided that they have sufficient maturity to understand the request they are making. Our pupils are generally assumed to have this level of maturity. A person with parental responsibility will generally be entitled to make a subject access request on behalf of pupils, but 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 their behalf. Moreover (if of sufficient maturity) their consent or authority may need to be sought by the parent making such a request.

Data Protection Officer

The Data Protection Officer is responsible for overseeing data protection within the School

so if you do have any questions in this regard, please do contact them on the information below: -

Data Protection Officer: Judicium Consulting Limited
Address: 72 Cannon Street, London, EC4N 6AE
Email: dataservices@judicium.com
Web: www.judiciumeducation.co.uk
Telephone: 0203 326 9174
Lead Contact: Craig Stilwell

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 us before involving them.