



THE ORATORY

PRIVACY NOTICE – THE ORATORY COMMUNITY

Including Old Oratorians and Friends of the Oratory School (FOS)

We are The Oratory Schools Association, a company registered in England and Wales (the “School”). Our company registration number is 00259021, our charity registration number is 309112 and our registered office is at The Oratory School, Woodcote, Reading RG8 0PJ.

The Oratory Community is made up of Old Oratorians and the Friends of the Oratory School (current parents), and is supported by the School’s Development and Alumni Office. The Oratory School has a full Data Protection Policy available via its website.

WHAT THIS PRIVACY NOTICE IS FOR

This Privacy Notice is intended to provide information about how the School will collect, use and hold (or “process”) personal data about the Oratory Community.

This makes the School a data controller of your personal information and this information is provided because data protection law gives individuals rights to understand how their data is processed and this Privacy Notice sets out how we will use that information and what your rights are in respect of the data we hold about you.

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 the parents of pupils;
- the School's policy on taking, storing and using images of children;
- the School's CCTV and biometrics policies;
- the School's retention of records policy;
- the School's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the School's IT policies, including its Acceptable Use policy, Social Media policy, Online Safety policy.

RESPONSIBILITY FOR DATA PROTECTION

The School has appointed Judicium Consulting Limited as its Data Protection Officer (“DPO”) who will deal with your requests and enquiries concerning the School’s processing 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. Contact details for the School’s DPO are at the end of this Notice.

WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

The use 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 our community's "legitimate interests":

- to send invitations and information about forthcoming events and activities of the Oratory Community and School.
- to send publications, such as the annual Community Magazine.
- To fundraise for bursaries, facilities, and various projects and activities critical to the School. This may include in-house analysis of your personal information to assess interest in future campaigns and possible future donations (commonly called wealth screening).
- For the purposes of donor due diligence and to confirm the identity of prospective donors and their background and relevant interests
- Carry out any other tasks critical to achieving the constitutional objectives of the Oratory Community.
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the school.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

This will include by way of example:

- names, dates of birth, addresses, interests, achievements and other information that you may have given us at the time of registration with the Oratory Community or subsequently.
- the dates when you or your child attended the school (if applicable);
- if you are a former staff member the dates when you worked with us;
- where you attended university and your occupation (if applicable);
- your communication preferences;
- records of any donations;
- your Gift Aid status (if applicable);
- information from articles in the media;
- Friends of the Oratory School (FOS) collects data such as name and contact details for the Year Group representatives.

HOW THE SCHOOL COLLECTS DATA

Data about Old Oratorians will usually be collected directly from Oratorians at the point of leaving the School. This may be via a form or simply in the ordinary course of interaction or communication (such as email).

However in some cases personal data will be supplied by third parties (such as from parents or siblings, LinkedIn, social media, career events etc) or collected from publicly available resources.

WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL SHARES IT WITH

Processing by third parties. Personal data collected by the School will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). However, personal data is stored external in cloud-based platforms for our school MIS, parent portal, alumni portal and school comms platform. In accordance with data protection law, this type of external data processing is always subject to contractual assurances that personal data will be kept securely and used only in accordance with the school's specific directions.

Data sharing. Occasionally, the School – including its governing board – will need to share personal information relating to its community of pupils and parents with third parties, such as:

- appropriate contractors, such as visiting music teachers;
- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- If you are a parent and a member of FOS the School may share your contact details with them and with ClassList on their behalf. FOS is a separate data controller and the School is not responsible for their processing of personal data.

HOW LONG WE KEEP PERSONAL DATA

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. Typically, the legal recommendation for how long to keep ordinary parent and pupil files is up to 7 years following departure from the School. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Bursar at bursary@oratory.co.uk. However, please bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data even following such request.

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

KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

The Development & Alumni Office 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 email and by 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 FOS and The Oratory School Society;
- Contact parents and/or alumni (including via the organisations above) 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.

Should you wish to limit or object to any such use, or would like further information about them, please contact the Bursar at bursary@oratory.co.uk. 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 more communications are sent to that particular address, email or telephone number).

YOUR RIGHTS

You have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require us to correct the personal data we hold about you if it is incorrect;
- to require us (in certain circumstances) to erase your personal data;
- to request that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. The School will endeavour to respond to any such requests as soon as is reasonably practicable and in any event within statutory time-limits (which is generally one month, but actually fulfilling more complex or multiple requests, e.g. those involving third party information, may take 1-2 months longer).

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 possible. Individuals must please notify the Bursar 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 or 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.

THIS POLICY

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 about this Privacy Notice should be directed to Judicium Consulting using the following contact details.

If you believe that the School has not complied with this Privacy Notice or acted otherwise than in accordance with data protection law, you should utilise the School complaints procedure and should also notify Judicium Consulting. 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.

Data Protection Officer: Judicium Consulting Limited
Address: 5th Floor, 98 Theobalds Road, London, WC1X 8WB
Email: dataservices@judicium.com
Web: www.judiciumeducation.co.uk
Telephone: 0345 548 7000 (Option 1, then 1)