



PROSPECTIVE, CURRENT AND FORMER PUPILS

INTRODUCTION

This notice is to help pupils understand how and why we collect your personal information and what we do with that information. It also explains the decisions that you can make about your own information.

We are giving you this notice because you are mature enough to make decisions about your personal information.

If you have any questions about this notice please talk to your Housem or Tutor.

WHAT IS "PERSONAL INFORMATION"?

Personal information is information that the School collects about you. This includes information such as your name, date of birth and address as well as things like exam results, medical details and behaviour records. The School may also record your religion or ethnic group. CCTV, photos and video recordings of you are also personal information.

HOW AND WHY DOES THE SCHOOL COLLECT AND USE PERSONAL INFORMATION?

Below are some examples of the different ways in which we use personal information and where it comes from. The School's primary reason for using your personal information is to provide you with an education.

Admissions forms give us lots of personal information. We get information from you, your parents/guardians, your teachers and other pupils. Your old school also gives us information about you so that we can teach and care for you.

Sometimes we get information from your doctors and other professionals where we need this to look after you.

We collect this information to help the School run properly, safely and to let others know what we do here. Here are some examples:

- We need to tell all staff if you are allergic to something or might need extra help with some tasks.
- We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms. The CCTV policy states that the Objectives of the CCTV Scheme are:
 - to protect the School and its buildings and other assets
 - to increase personal safety and reduce the fear of crime
 - to deter criminals from targeting the School
 - to support the Police in a bid to deter and detect crime
 - to assist in identifying, apprehending and prosecuting offenders

- to protect members of the public and private property within the grounds
- to assist in managing and running the School
- to promote good behaviour, via the pupil disciplinary process if necessary.
- We may need to report some of your information to the government. For example, we may need to tell the local authority that you attend the School or let them know if we have any concerns about your welfare.
- If you are from another country we have to make sure that you have the right to study in the UK. We might have to provide information to UK Visas and Immigration who are part of the government.
- Depending on where you will go when you leave us we may need to provide your information to other schools, colleges and universities or potential employers. For example, we may share information about your exam results and provide references. We may need to pass on information which they need to look after you.
- When you take public examinations (e.g. GCSEs) we will need to share information about you with examination boards.
- We may need to share information with the police or our legal advisers if something goes wrong or to help with an inquiry. For example, if one of your classmates is injured at the School or if there is a burglary.
- We may share some information with our insurance company to make sure that we have the insurance cover that we need.
- We may share your academic and your behaviour records with your parents or guardian so they can support your schooling via the parent portal, or directly through telephone, email or letter.
- We are required to share information with the Independent Schools' Inspectorate, the agency responsible for the inspection of ISC schools in England.
- We will only share your information with other people and organisations when we have a good reason to do so. In exceptional circumstances we may need to share it more widely than we would normally.
- If you are doing the IB, your name, school email address, photograph, nationality, first language, date of birth and curriculum information are stored on ManageBac.
- We will monitor your use of email, the internet and mobile electronic devices e.g. iPads. This is to check that you are not misbehaving when using this technology or putting yourself or others at risk of harm. If you would like more information about this you can read the "Policy on the Acceptable Use of ICT and E-safety" or speak to your Housem or Tutor.
- We may use photographs or videos of you for the School's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the School. We may also approve the use of photographs or videos by the Malvernian Society so that developments can be publicised. We may continue to use these photographs and videos after you have left the School.
- Sometimes we use photographs and videos for teaching purposes, for example, to record your drama lessons.
- We may provide photographs or videos of you to the School's overseas schools for their publicity. But we would obtain your consent before we do this.
- If you have any concerns about the use of photographs and videos please speak to your Tutor or Housem.

- We publish our public exam results, sports fixtures and other news on the School website and on social media, and put articles and photographs in the local news to tell people about what we have been doing.
- We publish examination results in the local newspapers and educational press but we will only include grades achieved by specific pupils, with their permission, in the form of profiles of those achieving exceptional results.
- We may keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the School.
- We may keep details of your address when you leave so we can send you the alumni magazine and find out how you are getting on. We may also pass your details onto the alumni organisation which is called the Malvernian Society. We have a data sharing agreement governing what information is passed over. Further information on the alumni association can be found here: <https://www.malverniansociety.org.uk/>

WHAT DO WE DO WITH YOUR PERSONAL INFORMATION?

The Data Compliance Officer (Mr D J Angus – dataprotection@malcol.org) is the person responsible at our School for managing how we look after personal information and deciding how it is shared.

Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly. We work hard to keep technical systems up to date and training staff so that your information is as secure as possible.

Our legal grounds for using your information

Legitimate interests

This means that the processing is necessary for legitimate interests of the School, or the legitimate interests of another, unless these are outweighed by the impact on you. In other words, the processing must be fair. The School relies on legitimate interests for most of the ways in which it uses your information.

The School has a legitimate interest in:

- Providing you with an education.
- Safeguarding and promoting your welfare and the welfare of other children.
- Promoting the objects and interests of the School. This includes fundraising e.g. if we want to raise money to fund bursaries or new buildings.
- Facilitating the efficient operation of the School.
- Ensuring that all relevant legal obligations of the School are complied with.

In addition your personal information may be processed for the legitimate interests of others. For example, we may use information about you when investigating a complaint made by a fellow pupil.

If you object to us using your information where we are relying on our legitimate interests as explained above, please speak to your Housem.

Legal obligation

This means that the School needs to use your information in order to comply with a legal obligation, for example to report a concern about your wellbeing to Children's Services. We may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

Vital interests

For example, to prevent someone from being seriously harmed or killed.

Public interest

The School considers that it is acting in the public interest when providing education.

Special Category Information

The School must also comply with an additional condition where it processes special categories of personal information. These special categories include: nationality, ethnicity, political opinions, religious or philosophical beliefs, health information and information about sex life or orientation.

Substantial public interest

The processing is necessary for reasons of substantial public interest.

Vital interests

For example, if you are seriously hurt or unconscious and cannot give consent.

Legal claims

The processing is necessary for the establishment in the exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

Medical purposes

This includes medical treatment and the management of healthcare services.

CONSENT

We may ask for your consent to use your information in certain ways. If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. Please speak to your Housem if you would like to withdraw any consent given.

SENDING INFORMATION TO OTHER COUNTRIES

We may send your information to other countries where:

- We store information on computer servers based overseas. For example, the IB ManageBac servers mentioned earlier are in Canada which has been judged by the European Commission to have an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.
- We communicate with you or your parents when you are overseas (for example, during the holidays if you live in a different country).

FOR HOW LONG DO WE KEEP YOUR INFORMATION

We keep most of your records for about 7 years after you have left the School but we will keep your public examination results for 12 years after your departure. This enables us to verify relevant details of your education for universities or employers when you authorise us to do so.

In exceptional circumstances, and if we are allowed to do so under data protection law, we may keep your information for a longer time than usual or share it more widely than we would normally. This is the case whilst the *Independent Inquiry into Child Sexual Abuse* is ongoing.

We can keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful for a book about the School.

WHAT DECISIONS CAN YOU MAKE ABOUT YOUR INFORMATION?

- If information is incorrect you can ask us to correct it.
- If you would like us to change or update the information we hold about you please speak to your Tutor / Housem.
- If you would prefer that we keep certain information confidential then please speak to your Tutor/Housem.
- You or your parents can ask to see the information we hold about you. If you are 13 years or over you would generally be the one to decide whether to make the request and your decision might over-ride your parents. The School will decide this if a request is made and we would provide you with the information within 1 month of the request being received.
- You can ask us to delete the information we hold about you in certain circumstances. For example, where we no longer need the information.
- You can ask us to send you or another organisation certain types of information about you in a format that can be read by computer.
- Our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.

FURTHER INFORMATION AND GUIDANCE

This notice is to explain how we look after personal information.

If you have any questions you can ask your Tutor / Housem about how it works in our School. Alternatively, you can ask your parents to speak to us on your behalf if you prefer.

If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office: ico.org.uk

THIS NOTICE - Effective 25th May 2018

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.