

DATA PROTECTION, PRIVACY & YOUR RIGHTS

The School is required by law to comply with the General Data Protection Regulation (GDPR) which governs how organisations collect and process data. RHS has a 'Privacy Notice' which provides information about how the School will use (or "process") personal data about its current, past and prospective pupils as well as all other members of our community.

The School collects a lot of data in many forms including, but not limited to:

- academic records and reports
- medical records
- attendance data
- pastoral records
- class groups
- photographs
- email communication
- CCTV footage
- and much more

This data is protected by several policies. Different data sets have different sensitivities and therefore levels of protection (e.g. medical data) but it is important that you know that as a pupil, **you have rights relating to all of your data.**

The Bursar is ultimately responsible for how your data is processed and retained at RHS.

WHO HAS ACCESS TO MY PERSONAL DATA & WHO DOES THE SCHOOL SHARE IT WITH?

For the most part, personal data collected by the School will remain within the School, and will be used by appropriate individuals only on a 'need to know' basis. Stricter rules of access apply to sensitive things like medical records and pastoral or safeguarding files.

the police or social services. For further information about this, please view the Safeguarding and Child Protection Policy on the School's website.

Occasionally, the School will need to share personal information relating to pupils with third parties, such as professional advisers (lawyers and accountants) or relevant authorities (police or the local authority).

Data on School leavers will be passed to the RHS Charitable Trust in order for them to keep in touch with you as alumni after you leave the School.

However, a certain amount of data will need to be provided to teachers and other members of staff in order to provide the necessary care and education that you require. For example, we share allergy information with the caterers and/or provide appropriate medical information to your house staff and trip organisers in addition to medical staff.

The School is required by law (Keeping Children Safe in Education) to record or report incidents and concerns that arise or are reported to it, in some cases whether or not they are proven, if they meet a certain level of seriousness. This may include notes on personal or safeguarding files, and in some cases referrals to relevant authorities such as

Some of the School's processing activity is carried out on its behalf by third parties, such as IT systems or cloud storage providers. We will only do this if we have received assurance from these third parties that they will use your data in a way permitted by law.

Whenever the School uses your data, or passes it on to relevant third parties, this is referred to as 'Data Processing'.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

Typically, the School keeps pupil files for seven years following your departure from the School. However, incident reports and safeguarding files may need to be kept much longer, in accordance with specific legal requirements. Additional arrangements apply for CCTV images and some other types of data.

If you have any specific queries about how this 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:

bursar@royalhospitalschool.org.

However, please bear in mind that the School may have lawful and necessary reasons to hold on to some data.

YOUR RIGHTS TO ACCESS YOUR DATA

Pupils have various rights under data protection law to access and understand personal data held about them by the School, and in some cases to ask for it to be erased or amended or for the School to stop processing it. If you wish to access or amend your personal data, or if you have an objection to how your personal data is being used, you can contact the Bursar (bursar@royalhospitalschool.org) to make your request in writing. This is known as a subject access request.

The School will endeavour to respond to any such written requests as soon as is reasonably practicable and within one month of your request. The School will be better able to respond quickly to smaller, specific requests for information. If the request is obviously excessive or very similar to previous requests, the School may ask you to reconsider or it



may charge a fee, but only where data protection law allows it.

Some 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 School is also not required to disclose any examination scripts, nor any confidential reference given by the School for the purposes of your education or training.

PUPIL REQUESTS

Pupils can make subject access requests for their own personal data provided that, in the reasonable opinion of the School, they have sufficient maturity to understand the request they are making (see section **Pupil Rights - Your Data, Your Rights**). A pupil of any age may ask a parent or other representative to make a subject access request on their behalf. The School would generally class pupils in Year 9 and upwards as having the level of maturity required to make a subject access request but it reserves the right to confirm any such request with a parent or responsible adult. This will be considered on a case by case basis.

CONSENT

You are required to give consent to the School for your data to be collected, stored and processed. You may withdraw your consent for the School to process your data at any time, subject to similar

age considerations as above, by writing to the Bursar (bursar@royalhospitalschool.org). However, please be aware that the School may have another lawful reason to process your personal data, even without your consent.

Reasons for withdrawing your consent will usually have been set out under this Privacy Notice, or may otherwise exist under some other form of legal agreement the School has with you or your parents.

PUPIL RIGHTS - YOUR DATA, YOUR RIGHTS

The rights under data protection law belong to the individual to whom the data relates - i.e. you, the pupil. However, the School will often rely on parental consent to process personal data relating to you unless, given the nature of the processing in question, it is more appropriate to ask you directly. In general, the School 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 your activities, progress and behaviour, and in the interests of your welfare, unless, in the School's opinion, there is a good reason to do otherwise.

If you have a confidential concern that you raise with a member of staff and expressly withhold your agreement for this personal data to be disclosed to your parent or guardian, the School will maintain the confidentiality of your data unless, in the School's opinion, there is a good reason to do otherwise; for example, where the School believes there to be a safeguarding issue, or if it is required to disclose your information by law.

Pupils are required to respect the personal data and privacy of others, and to comply with the School's policies e.g. the Pupil Digital Handbook and the School rules.

QUERIES & COMPLAINTS

The School takes its responsibilities for your data and privacy seriously. If you have any comments, concerns or queries on this or about how your data has been processed by the School you should contact the Bursar:

bursar@royalhospitalschool.org.

You will learn more about data protection in your Compass, PSHE and RHS+ lessons.