



WINCHESTER  
COLLEGE

## Privacy Policy

**Next review date: December 2019**

**Author: CAHG/JPC**

This policy is intended to provide information about how the School will use (or "process") personal data about individuals including current, past and prospective pupils, and their parents, carers or guardians (referred to in this policy as "parents").

It applies in addition to the School's Terms and Conditions, and any other information the School may provide about a particular use of personal data.

### 1. Responsibility for Data Protection

In accordance with EU GDPR of May 2018 and the Data Protection Act 2018 ('the Act'), the School has notified the Information Commissioner's Office of its processing activities. The School's ICO registration number is Z5751669 and its registered address is Winchester College, College Street, Winchester, SO23 9NA.

The School has appointed its Domestic Bursar as Data Protection Liaison Officer ("DPLO") who will endeavour to ensure that all personal data is processed in compliance with this Policy and the Act.

### 2. Types of personal data processed by the School

As part of its operations, the School may process a wide range of personal data about individuals including current, past and prospective employees, as well as current, past and prospective pupils and their parents, including by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- bank details and other financial information, eg. about parents who pay fees to the School;
- current, past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- where appropriate, information about individuals' health, and contact details for their next of kin;
- references given or received by the School about pupils, and information provided by previous educational establishments and/or other professionals or organisations working with pupils; and
- images of pupils (and occasionally other individuals) engaging in school activities, and images captured by the School's CCTV system.

Generally, the School receives personal data from the individual directly (or, in the case of pupils, from parents). However, in some cases personal data may be supplied by third parties (for example another

school, or other professionals or authorities working with that individual), or collected from publicly available resources.

The School may, from time to time, need to process "sensitive personal data" regarding individuals. Sensitive personal data includes information about an individual's physical or mental health, race or ethnic origin, political or religious beliefs, sex life, trade union membership or criminal records and proceedings. Sensitive personal data is entitled to special protection under the Act, and will only be processed by the School with the explicit consent of the appropriate individual, or as otherwise permitted by the Act.

### **3. Use of personal data by the School**

The School will use (and where appropriate share with third parties) personal data about individuals for a number of purposes as part of its operations, including as follows:

- To provide information to you that you request from us relating to our products, education services (including SEN), career services, and extra-curricular activities of pupils; monitoring pupils' progress and educational needs; and maintaining relationships with alumni and the School community;
- To provide information to you relating to other products that may be of interest to you. Such information will only be provided where you have consented to receive such information.
- To inform you of any change to our website, services or goods and products.
- For the purposes of pupil selection and to confirm the identity of prospective pupils and their parents;
- For the purposes of management planning and forecasting, research and statistical analysis, and to enable the relevant authorities to monitor the School's performance;
- 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 School;
- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency 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, insurance purposes or to organisers of school trips;
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's IT Acceptable Use Policy;
- To make use of photographic images and video of pupils in School publications, on the School website and other communication channels owned by the School, in accordance with Section 11 of the School's Parent Contract;
- For security purposes, and for regulatory and legal purposes (for example Child Protection and Health & Safety) and to comply with its legal obligations;
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School.

In running and maintaining our website we may collect and process the following data about you:

- Information about your use of our site including details of your visits such as pages viewed and the resources that you access. Such information includes traffic data, location data and other communication data.
- Information provided voluntarily by you. For example, when you make an enquiry or register for information.
- Information that you provide when you communicate with us by any means.

#### 4. Use of Cookies

Cookies provide information regarding the computer used by a visitor. We may use cookies where appropriate to gather information about your computer in order to assist us in improving our website.

We may gather information about your general internet use by using the cookie. Where used, these cookies are downloaded to your computer and stored on the computer's hard drive. Such information will not identify you personally. It is statistical data. This statistical data does not identify any personal details whatsoever

You can adjust the settings on your computer to decline any cookies if you wish. This can easily be done by activating the reject cookies setting on your computer.

#### Cookies used on our website

CookieID	Name	Expiration date	Description	Intrusiveness Level
_ga	Google Analytics	2 years	Determining Visitor Session	Low
_gat_UA-81121548-9	Google Analytics	Not set	Determining Visitor Session	Low
_gid	Google Analytics	1 day	Identifying Unique Visitors	Low
XSRF-TOKEN	CSRF tokens	1 hour	Cross-site request forgery	Zero
wincollege_session	Website session data	1 day	Used for user session	Zero

#### 5. Storing your personal data

In operating our website, the data we collect from you is stored within the European Union. By providing your personal data to us, you agree to this. We do our utmost to ensure that all reasonable steps are taken to make sure that your data is treated and stored securely.

#### 6. Disclosing your information

We will not disclose your personal information to any other party other than in accordance with this Privacy Policy and in the circumstances below:

- Where we are required by law to disclose your personal information.
- To further fraud prevention and reduce the risk of fraud.

#### 7. Third party links

On occasion we include links to third parties on this website. Where we provide a link it does not mean that we endorse or approve that site's policy towards visitor privacy. You should review their privacy policy before sending them any personal data.

#### 8. Keeping in touch and supporting the School

The School will use the contact details it has been given by parents, alumni and other members of the School community to keep them updated about the activities of the School, including by sending updates and newsletters by email and by post, and by making contact by telephone.

Unless the relevant individual objects and informs the School of this in writing, the School may 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;
- Contact parents and/or alumni (including via the organisations above) by post and e-mail and telephone in order to promote and raise funds for the School;
- 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 DPLO in writing.

### **9. Access to information**

In accordance with EU GDPR of May 2018 you have the right to access personal data held by the School, subject to certain exemptions and limitations set out in the Act. Any individual wishing to access their personal data should put their request in writing to the DPLO.

The School will endeavour to respond to any such written requests (known as "Subject Access Requests") as soon as is reasonably practicable and in any event within statutory time-limits.

You should be aware that certain data is exempt from the right of access under the Act. 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 pupil examination scripts (though examiners' comments may fall to be disclosed), nor any reference given by the School 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 School, they have sufficient maturity to understand the request they are making. Pupils aged 12 or over are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested. All Subject Access Requests from current pupils will therefore be considered on a case by case basis.

A person with parental responsibility will generally be expected to make a Subject Access Request on behalf of younger children. A pupil of any age may ask a parent or other representative to make a Subject Access Request on their behalf, though the pupil must confirm in writing that they have made that request.

### **10. Rights under the Act**

The rights under the Act belong to the individual to whom the data relates. However, the School will in most cases rely on parental consent to process personal data relating to pupils (if consent is required under the Act) 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.

In general, the School will assume a pupil's consent to disclosure of their personal data to their parents, eg. 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, the School will maintain confidentiality unless, in the School's 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.

Pupils are required to respect the personal data and privacy of others and to comply with the School's IT: Acceptable Use Policy and the School Rules.

### **11. 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 notify the School of any changes to information held about them.

An individual has the right to request that inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under the Act) and may do so by contacting the School in writing.

The School will take appropriate technical and organisational steps to endeavour to ensure the security of personal data it holds about individuals. All staff will be made aware of this Policy and their duties under the Act.

### **12. Queries and complaints**

Any comments or queries on this Policy should be directed to the DPLO in writing using the following contact details:

The Domestic Bursar  
Data Protection Liaison Officer  
Winchester College  
College Street,  
WINCHESTER  
SO23 9NA

If an individual believes that the School has not complied with this Policy or acted otherwise than in accordance with the Act, they should also notify the DPLO.