



Emanuel School

Privacy Notice for Pupils and Parents

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1. Introduction

This notice explains **how** and **why** the school collects, uses and stores ("processes") personal data relating to its current, former and prospective pupils and their parents, carers or guardians (referred to collectively as 'parents' in this notice).

We provide this information because data protection law gives individuals the right to understand how their personal data is used. This 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. It complements the school's other relevant terms and conditions and policies, including:

- any contract between the school and the parents of pupils,
- any policies or guidance concerning the handling of personal data,
- the *Photographic Image and Video Policy*,
- the *CCTV Policy*,
- the *Data Retention Policy*,
- safeguarding, SEND, pastoral, or health and safety policies, including as to how concerns or incidents are recorded, and
- the school's IT policies, including but not limited to acceptable use policies and the *Online Safety Policy*.

This notice also applies to all individuals working for or on behalf of the school (including staff, volunteers, governors and service providers) who must be familiar with and comply with its requirements.

2. Responsibility for Data Protection

The bursar holds overall responsibility for ensuring that the school complies with data protection law.

On a day to day basis, the compliance manager handles requests and enquiries related to the school's use of personal data and works to ensure ongoing compliance with the school's data protection policies and procedures in relation to data protection law.

They can be contacted by email at data.protection@emanuel.org.uk, by post at Emanuel School, Battersea Rise, London SW11 1HS, or by telephone on 020 8870 4171.

3. The Purposes and Legal Basis for Processing Pupil and Parent Personal Data

Emanuel School collects, creates and stores personal information about its pupils and may also receive relevant information from a pupil's previous school, local authority and the Department for Education (DfE). In addition, the school collects and holds personal information about pupils' parents and carers.

Public task: The school needs to process a wide range of personal data where necessary in order to perform a public task in the public interest or to exercise one of the functions or powers as a school. For example, when the school uses personal data to teach and look after children.

Legal obligation: The school will need to carry out activities to fulfil its legal duties or obligations – including those under a **contract** with parents of its pupils and statutory duties placed upon us for the Department for Education (DfE) data collections.

Vital interests: In limited circumstances we may use personal data to protect vital interests. For example, to prevent someone from being seriously harmed or killed.

Legitimate interests: The school may use personal data where this aligns with the school's legitimate interests, or the legitimate interests of a third party. These interests will always be carefully balanced against the rights, freedoms and interests of individuals concerned. The school will not rely on legitimate interests as a basis for processing where doing so would cause undue harm to individuals or involve the use of special or sensitive types of data (for example, health information, racial or ethnic origins). Special category data will only be processed where there is a lawful basis under data protection law, such as where explicit consent has been given, where it is necessary for safeguarding purposes, or where the processing is required by law.

3.1 The Lawful Basis 'Legitimate Interest' in Detail

The school considers the following uses to fall within the category of **legitimate interest**:

- for the purposes of pupil selection and to confirm the identity of prospective pupils and their parents, and retain a record (if appropriate) for the purposes of future applications or openings.
- to support learning and provide education services, including musical education, physical training or spiritual development, career services, educational trips (in the UK and abroad), extra-curricular activities to pupils, and monitoring pupils' progress and educational needs, including where such services are provided remotely (either temporarily or permanently).
- to carry out our outreach programme.
- to safeguard pupils' health and welfare and provide appropriate pastoral care (including following the requirements and recommendations of the government's guidance *Keeping Children Safe in Education* (KCSIE)).
- to keep children safe (food allergies/emergency contact details).
- to report to and liaise with parents about their child's progress, welfare and development including by way of regular reports and parents' evenings.
- 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.
- maintaining and developing relationships with alumni and the wider school community. This includes activities such as direct marketing and fundraising to sustain engagement and secure philanthropic support (please see *Keeping in Touch and Supporting the School's Development* for further details).
- to carry out donor due diligence, maintain accurate records (including for Gift Aid purposes) and ensure accountability. This includes verifying the identity, background and relevant interests of prospective donors, as well as helping the school tailor its fundraising activities to promote its aims, values and strategic goals (please see also *Keeping in Touch and Supporting the School's Development*).for the purposes of management planning and forecasting, research and statistical analysis including that imposed or provided for by law.
- to enable relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate.
- to raise invoices and process payments in accordance with the school's *Terms and Conditions*.
- to monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's policies.
- to comply with our obligation as a UK Visas and Immigration Licensed Sponsor to ensure that every pupil has permission to be in the UK.
- to make use of photographic images of pupils in school publications, on the school website and (where appropriate) on the school's social media channels in accordance with the school's *Photographic Image and Video Policy*.
- to provide information about the activities of the school including by sending updates and newsletters by email and post.
- using CCTV for security, behaviour and disciplinary purposes in accordance with the school's *CCTV Policy*.
- for the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.
- to carry out or cooperate with any school or external complaints, disciplinary or investigation process.
- where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.
- to determine the outcome of bursary applications and decide what level of bursary, if any, will be awarded.
- to carry out credit, identity and source of funds checks, whether with previous schools and/or third party sources or service providers, including for the purposes of verifying that parents are not subject to (or within purview of) sanctions.
- to promote the school to prospective parents and pupils.

From time to time, the school will need to process **special category personal data** (such as information about a pupil's health, ethnicity, religion, biometrics or sexual life). This will be done in accordance with legal obligations (for example safeguarding requirements) or based on explicit consent, where required. The purposes for processing this type of information may include:

- to safeguard pupils' welfare/wellbeing and provide appropriate pastoral and, where necessary, medical care. This includes responding to emergencies, incidents or accidents, and may involve sharing relevant information where it is in the pupil's interests: for example for emergency medical care, to arrange the assessment and diagnosis of a pupil's health and medical conditions and special educational needs, to comply with safeguarding duties, liaise with police or social services, support insurance claims or inform caterers or organisers of school trips of dietary or medical needs,
- to comply with public health requirements , including those aimed at protecting against serious cross-border threats to health. This may involve managing on-site testing (e.g., for infectious diseases), processing test results and sharing this information with relevant health authorities,

- to provide educational services tailored to individual needs, including making reasonable adjustments for disabilities and/or any special educational needs of a pupil,
- to support applications for special consideration with public examination boards, such as in the context of teacher-assessed grades,
- to provide spiritual education in the context of any religious beliefs,
- to operate systems that rely on biometric data, such as those used for security and other forms of pupil identification (lockers, lunch etc.),
- as part of any school or external complaints, disciplinary proceedings or investigations where special category data is relevant - for example, in matters involving SEND, health or safeguarding.
- To meet the school's legal obligations, such as child protection duties, diversity monitoring, health and safety requirements or immigration/visa sponsorship compliance).

The school may seek consent to use personal information in certain ways as an alternative to relying on any of the lawful bases as above. When this is the case, parents and/or pupils will be informed and asked to provide their consent. Consent is voluntary and can be withdrawn at any time. However, any use of personal information before consent is withdrawn will remain valid.

4. Categories of Pupil/Parent Personal Data

The types of pupil and parent data processed by the school include:

- personal identifiers and contact details such as names, unique pupil number, telephone numbers, email addresses and address,
- bank details and other financial information (e.g. about parents who pay fees to the school), and any source of funds and/or anti-money laundering information the school is required to collect by law,
- personal characteristics such as pupil's ethnic group, religious beliefs, language,
- assessment and attainment records including examination scripts and marks,
- special educational and physical needs (including the needs and ranking),
- attendance records (such as sessions attended, number of absences, absence reasons and previous schools attended)
- admissions records,
- information about a pupil's health and welfare/medical needs (such as GP information, allergies, medication, dietary requirements),
- contact details for their next of kin/emergency contact,
- destination data for school leavers (*This refers to information about a pupil's next steps after leaving Emanuel School - for example information about the university a sixth form leaver will attend or the sixth form college that a GCSE leaver will join.*),
- child protection records (*confidential records which relate to concerns about a child's welfare and safety*),
- safeguarding information (*such as court orders and professional involvement*),
- behavioural records, suspension and exclusion information,
- 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,
- correspondence with and concerning staff, pupils and parents past and present,
- images and video captured by staff around school, at school events and on educational visits and by external photographic agencies for use by the marketing department (in accordance with the school's *Photographic Image and Video Policy*),
- images captured by the school's CCTV system (in accordance with the school's *CCTV Policy*),
- nationality, passport and immigration status information (where applicable) or other evidence of the pupil's right to live/study in the UK,
- recording of one-to-one online video meetings (*in line with the school's safeguarding procedures*).

- data relevant for bursary applications (such as identifiable details, financial information, capital assets, itemised household expenditures).

5. Data Collection at the School

The school typically collects personal data directly from individuals. Pupil data is collected through parents via forms such as registration or medication forms. Data may also be gathered through everyday interactions, such as emails, written assessments, or other forms of communications.

Pupil data is essential for the school's operations. While most of the pupil information provided by parents is mandatory, some details are requested on a voluntary basis. To comply with the data protection legislation, the school will inform parents at the time of data collection whether the information is required or if it is optional.

In some cases, personal data may be obtained from third parties such as other schools, professionals or authorities working with the pupil.

Additionally, we may collect data from reputable publicly available sources, for example, for the purposes related to wealth screening or donor research.

6. Data Processors

We use third party data processors to provide us with a management information system, accounts software, bursary management, cloud storage services, apps and software to support teaching and the overall educational experience as well as to help us provide pastoral support to our pupils.

This use of data processors will only take place if it is in compliance with the UK GDPR.

7. Sharing Data with Third Parties (Other Data Controllers)

From time to time, the school (including its governing body, where appropriate) may need to share personal data (including special category data as required) with third parties. These may include:

- **Relevant authorities**, such as the Department for Education (DfE), Independent Schools Inspectorate (ISI), Independent Schools Council (ISC), the Charity Commission, HMRC, the Home Office, relevant public health/NHS bodies (e.g. in relation to on-site immunisation programmes), police, Teaching Regulation Agency, or the local authority and other organisations within the multi-agency safeguarding partnership;
- **Professional advisers**, including the school's legal representatives, insurers and accountants;
- **Stage 3 complaint panels**, which include independent panel members appointed to review formal complaints;
- **Approved contractors**, such as visiting music teachers or other specialist instructors.

As a member of the United Westminster & Grey Coat Foundation, the school may also, from time to time, need to share personal information with the Foundation Office for operational or governance-related purposes.

Where the school receives information requests from external agencies and has a statutory obligation to respond, it will consider on a case-by-case basis whether it is appropriate to inform parents.

Other examples of third-party data sharing include:

- **Examination Boards:** Personal information - including special category data relevant to access arrangements or reasonable adjustments - will be shared with examination boards and awarding bodies such as the Joint Council for Qualifications (JCQ), for the purposes of examining and awarding qualifications. This information will be retained by the awarding body to maintain a

comprehensive archive of a pupil's examination results. Awarding bodies may share this information with educational agencies (DfE, WG, The Skills Funding Agency, HESA, UCAS, local authorities, regulators, EFA or the Learning Records Service). The examination boards routinely used at Emanuel School include AQA, Pearson, Edexcel, OCR, WJEC/EDUQAS, Cambridge International (CAIE).

The JQC *Information for Candidates/Privacy Notice* (Information about you and how we use it) can be found [here](#).

- **Emanuel Parent Association (EPA):** Where consent has been provided by parents, the school may share contact details with the Emanuel Parent Association (EPA), an independent organisation that supports engagement within the school community.

The EPA acts as a separate data controller, and the school is not responsible for how the EPA processes personal data.

- **Educational Trip Providers:** When pupils participate in off-site visits and residential trips, personal information may be shared with trip providers to ensure safe and efficient organisation. This might include passport details for overseas travel. Such data sharing is subject to contractual safeguards to ensure compliance with data protection requirements and, where applicable, international data transfer standards.
- **Careers Guidance Providers:** The school may share pupil data with external organisations that provide careers guidance, events and interviews, or careers competition organisers (for example, Morrisby or UCAS).
- **UK Visas and Immigration:** As a Tier 4 licensed sponsor, Emanuel School may be required to share personal data with UK Visas and Immigration (UKVI) in relation to visa sponsorship, compliance checks or immigration status assessments.
- **Debt Recovery:** In the event of unpaid school fees, the school may share relevant contact details and payment history with a debt collection agency. Prior to taking such steps, affected individuals will be informed in writing.
- **School Inspections:** When requested, the school may share relevant academic records with inspectors from the Independent Schools Inspectorate (ISI) as part of a formal school inspection.

7.1 Accessing and Sharing Sensitive Data

Particularly strict rules of access apply to the context of special category data/sensitive data, most notably:

- medical records,
- pastoral or safeguarding files.

Medical Information: The school processes medical information to fulfil its statutory duties and to ensure the safety and wellbeing of pupils and others in the school community. Access to this information is strictly on a need-to-know basis. In certain circumstances, wider dissemination may be needed - for example, to ensure appropriate care during school trips or to accommodate dietary requirements in catering. Where appropriate, the school will seek express consent before sharing medical data. However, essential details relating to a pupil's special educational needs, medical conditions, physical health or other pastoral will be provided to staff more widely, where this is necessary to provide the care and education the pupil requires. Where external professionals (such as therapists or educational specialists) are engaged to support a pupil, relevant information may be shared with them to enable effective care and intervention.

Safeguarding Data: Appropriate information sharing is central to effectively safeguarding children from harm, promoting their wellbeing and making sure that they get the support they need. The school can share information with other schools and children's social care teams. It is not usually necessary to ask for consent to share personal information for the purposes of safeguarding a child.

Sharing information on Prevent concerns is treated the same as wider safeguarding.

The school is under duties imposed by law and statutory guidance (including *Keeping Children Safe in Education* or '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 may include file notes on pupil or safeguarding files, in some cases referrals to relevant authorities such as the LADO, Children's Services, CAMHS or police and/or working with other organisations within the multi-agency partnership.

In line with KCSIE, when a child transfers to another school, their child protection file, including any Prevent concerns, will be promptly and securely transferred to the new school. This may also include other information deemed relevant by the school's designated safeguarding lead (DSL) to support the pupil's ongoing care and wellbeing. Where appropriate, the school will consult with parents about how best to meet the pupil's needs. However, the final decision regarding what safeguarding information should be shared rests with the school. The school will retain a copy of the child protection file in accordance with the school's data retention schedule. For further information, please refer to the school's *Safeguarding and Child Protection Policy*.

8. Keeping in Touch and Supporting the School's Development

The school uses the contact details of parents and alumni to keep them informed about school activities, as well as parent and alumni events that may be of interest. This includes sending updates and newsletters by email and post.

Emanuel School's foundation, growth and continued success have been supported by philanthropy, and philanthropy continues to make an enormous impact at our school. Unless an individual objects, the school may contact parents and alumni by post or email to share fundraising initiatives and to encourage support for the school and, where appropriate, other charitable causes. Occasionally, the school may also contact individuals by telephone, in accordance with the Privacy and Electronic Communications Regulations (PECR) unless the individual has opted out or objected to such contact.

As a fundraising organisation, the school conducts in-house research and, from time to time, engage trusted third-party partners to gather additional information about parents and alumni from publicly available sources. These sources may include Companies House, the Electoral Register, reputable news archive articles and publications, company websites and professional networking sites such as LinkedIn, and general geographic and demographic information linked to your postcode. This research helps the school to communicate more efficiently and effectively by ensuring our messages are appropriately tailored and targeted.

The school may also use trusted third-party partners to conduct wealth screening to support and accelerate the research. All data shared with such partners is transferred securely, and the recipients are bound by strict confidentiality agreements. They are required to handle the data lawfully and with due respect for its security and privacy.

Should you wish to limit or object to any such use as described above, or would like further information about them, please email development@emanuel.org.uk. You always have the right to withdraw consent, where previously given, to object to direct marketing or any form of fundraising communication.

Please also refer to the *Privacy Notice for Alumni and Friends*.

9. Data Subject Rights

Data protection legislation gives individuals certain rights which are detailed below. If you wish to exercise these rights, please contact data.protection@emanuel.org.uk.

9.1 Right of Access to Personal Data (Subject Access Requests)

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. We take the security of personal data seriously and may ask for proof of identity to verify entitlement to the information requested.

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 fulfilling more complex or multiple requests, e.g. those involving third party information, may take up to 2 months longer).

The school will be better able to respond quickly to smaller, targeted requests for information made during term time. If the request for information is manifestly excessive or similar to previous requests, the school may ask you to reconsider or require a reasonable fee for the administrative costs of complying with the request, or in certain cases refuse the request (but only where data protection law allows it, and in accordance with relevant regulatory guidance).

Individuals should be aware that the right of access is limited to their own personal data and certain data is exempt from the right of access. This will include information which identifies other individuals (parents need to be aware that this may include their own children in certain limited situations), or information which is subject to legal privilege (for example legal advice given to or sought by the school, or documents prepared in connection with a legal action).

The school is also not required to disclose any pupil examination scripts or other information consisting solely of pupil test answers, provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference held by the school that was (or will be) given for the purposes of the education, training, appointment or employment of any individual.

9.1.1 Pupil Access 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 'Whose Right's below). A pupil of any age may ask a parent or other representative to make a request on their behalf.

Indeed, while a person with parental responsibility will generally be expected to make a subject access request on behalf of younger pupils, the law still considers the information in question to be the child's; for older pupils, the parent making the request may need to evidence their child's authority for the specific request. Requests not considered in the child's best interests may sometimes be refused.

Pupils aged 12 and above are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home. Slightly younger children may however be sufficiently mature depending upon the child and all the circumstances.

9.1.2 Parental Access Requests

It must be clearly understood that the rules of subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they

and others will often have a legitimate interest or expectation in receiving certain information about pupils without their consent. The school may consider there are lawful grounds for sharing with or without reference to the pupil.

Parents will in general receive educational and pastoral updates about their children as outlined in the parent's contract. Where parents are separated, the school will aim to provide the same information to each person with parental responsibility but may need to factor in all the circumstances including the express wishes of the child, court orders or pastoral issues.

All information requests from, or on behalf of, or concerning pupils (whether made as a data subject access or simply as an incidental request) will therefore be considered on a case by case basis.

9.2 Right to Withdraw Consent

Where the school is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Please be aware however that the school may have another lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this *Privacy Notice* or may otherwise exist under some form of contract or agreement with the individual (e.g. parent contract).

9.3 Right to Rectification

An individual has the right to have the personal data that we hold about them to be rectified if it is inaccurate or incomplete.

The school will endeavour to ensure that all personal data held in relation to an individual is kept up to date and accurate. Individuals must please notify the school of any significant changes to important information, such as contact details, held about them.

9.4 Right to Erasure

An individual has the right to request the deletion or removal of personal data where there is no compelling reason for its continued processing (subject to certain exemptions and limitations under data protection law). If an individual makes such a request, the school will consider whether the right to erasure applies and give a full and reasoned response.

9.5 Right to Restrict Processing

In certain circumstances individuals have the right to request that the school restricts the processing of their personal data (e.g. permitting its storage but no further processing). If such a request is made, the school will consider whether the right to restrict processing applies. If the processing cannot be restricted the school would give a full and reasoned response.

9.6 Whose Rights?

Under data protection law, the rights relating to personal data belong to the individual to whom the data pertains. However, the school will often rely on parental authority or notification to process personal data relating to pupils (for example under the parent contract, or through consent forms). However, parents and pupils should be aware that this is not the same as the school relying on explicit consent as a legal basis.

Where consent is legally required for certain types of data processing, the school may, depending on the nature of the processing and the pupil's age and level of understanding, seek the pupil's consent - either in addition or instead of parental 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, the school will presume that parental access to a pupil's personal data is appropriate and in the pupil's best interests – for example, to keep academic progress, behaviour and welfare - unless there is a compelling reason to withhold such information.

However, where a pupil seeks to raise concerns in confidence and explicitly asks that their personal data is not shared with their parents, the school may choose to respect this request. This will depend on the circumstances and whether, in the school's judgement, disclosure is necessary – for example, to safeguard the pupil or others, or to comply with a legal obligation.

Pupils are expected to respect the privacy and personal data of others, and must comply with the school's *Pupil Acceptable Use Agreement* and the school rules. Similarly, all staff are bound by professional standards and policies relating to data protection and confidentiality.

10. Data Retention

The school retains personal data securely and only for as long as is necessary to fulfil a legitimate and lawful purpose. Typically, pupil files are kept until the pupil has reached the age of 25. However, certain records – such as incident reports and safeguarding files – are subject to longer retention periods in accordance with specific legal requirements.

If you have any specific queries about how the school's *Data Retention Policy* is applied, or if you would like to request the erasure of personal data you believe is no longer relevant, please contact the school at data.protection@emanuel.org.uk. Please note, however, that the school will often have lawful and necessary reasons to hold on to some data even following such a request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even when 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 ('suppression record').

11. Data Security

The school has in place appropriate technical and organisational measures that ensure a level of security appropriate to the sensitive nature of the personal data that we process.

12. Queries and Complaints

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance by contacting the bursar at data.protection@emanuel.org.uk. Please include all relevant details in your email.

You can also lodge a complaint directly with the Information Commissioner's Office (ICO) [here](#), although the ICO recommends that steps are taken to resolve the matter with the school before involving the regulator.

13. Policy Review & Approval

The school will update this privacy notice from time to time to ensure it still accurately reflects the school's use of personal data. Any substantial changes that effect your rights will be provided to you directly as far as reasonably practicable.

Policy Owner	Bursar
Date of last review	Summer 2025
Approved by	Cabinet: 30 April 2025
Responsible Committee	Finance and Building
Date of next review	Spring 2026

14. Related Policies and Documents

- The UK General Data Protection Regulations (2021)
- UK Data Protection Act (2018)
- Privacy Notices
- Data Protection Guidelines for Staff
- Data Protection Policy
- Data Retention Policy
- CCTV Policy
- Photographic Image and Video Policy
- Procedure for Responding to a Subject Access Request
- Safeguarding and Child Protection Policy
- Complaints Procedure