CHRIST'S HOSPITAL

PRIVACY NOTICE

Introduction

1. In order to conduct its legitimate activities, Christ's Hospital (CH), incorporating Christ's Hospital Foundation and the Charities of John and Francis West for Pensioners, and the trading entities Christ's Hospital Enterprises Limited (CHEL) and Christal House Contracts Ltd, needs to process personal data concerning a wide range of individuals.

2. CH is the controller of this personal data and is registered as such with the ICO; registration number Z115417X. CH is also the processor of Bluecoat Sports staff payroll personal data.

   Christ's Hospital
   Horsham
   West Sussex
   RH13 0LJ

3. CH is committed to processing personal data in accordance with the UK General Data Protection Regulation (GDPR) and Data Protection Act. We take our responsibilities to process personal data in accordance with the seven core principles of GDPR seriously:

   - Lawfulness, fairness, and transparency
   - Purpose limitation
   - Data minimisation
   - Accuracy
   - Storage limitation
   - Integrity and confidentiality (security)
   - Accountability

Purpose

4. The purpose of this Privacy Notice is to explain how we process personal data.

Scope

5. For the avoidance of doubt, this Notice applies to all living individuals on whom CH processes personal data of any kind, but it is particularly intended to cover prospective, current and former:

   - students (and alumni);
   - parents and guardians;
   - staff and volunteers;
   - suppliers and contractors;
   - clients and customers;
   - supporters and donors;
   - residents and tenants;
   - stakeholders;
   - Council and committee members
   - governors;
   - guests and visitors; and
   - members of the public.

Personal data processed by CH

6. Personal data processed by CH can take many different forms – it may be factual information, expressions of opinion, images or other recorded information which identifies or imparts something of significance about a living individual. It may be held electronically, in hard copy paper form or held as photographic images.

7. Personal data processed by CH typically includes names and contact details and may also include information such as:

    - for students - admissions, academic, disciplinary, medical and other education related records, information about special educational needs, references, examination scripts and marks, images, audio and video recordings;
    - for parents and guardians - employment details, family circumstances and financial information;
    - for staff and contractors - additional information required for their employment or appointment including references, documents, reports, appraisals, images, audio and video recordings and
    - for supporters and donors - financial information.

8. For a very small number of purposes, CH processes special categories of data which may include information concerning an individual's ethnic group, religious beliefs, trade union membership, criminal record and proceedings, biometric data and their physical and mental health.

9. CH collects the personal data it processes directly from, and with the consent of, the data subject (or in the case of a student, his/her parents or guardians) and from third parties (for example referees, students' previous schools, previous employers and the Disclosure and Barring Service (DBS).

Purposes for which personal data is processed

10. Personal data (including special categories of data, where appropriate) is processed by CH in accordance with the GDPR for the following purposes:

    - The provision of education including the registration of prospective students and administration of the admissions process; administration of the school curriculum and timetable; administration of students' entries to public examinations, reporting upon and publishing the results; providing references for students (including after a student has left); preparation of information for inspections by the Independent Schools Inspectorate.
    - The provision of educational support and ancillary services including the provision of pastoral care, welfare, health care services and maintenance of discipline; provision of careers and library services; administration of the Combined Cadet Force and other school clubs and societies; administration of sporting teams and fixtures; administration of school trips; boarding house administration; the administration of the school's ICT Code of Conduct for Students by monitoring students' email communications, internet use and telephone calls.
    - The general administration of the school including the compilation of student records; the administration of bursaries, scholarships, invoices, fees and accounts; the management of the school's property; the management of

security and safety arrangements (including through the use of CCTV); the administration and implementation of the school's policies; and other reasonable purposes related to the day-to-day operations of the school.

- The protection and promotion of CH's legitimate interests and objectives including the publication of its web site, the prospectus and other marketing publications; fund-raising for charitable purposes; the maintenance of an historic archive; organisational governance and communicating with former students (Old Blues).
- The administration of its staff, agents and suppliers including the recruitment of staff and engagement of contractors (including compliance with DBS procedures); administration of payroll, pensions, the death in service scheme, sick leave and the maintenance of appropriate human resources records for current and former staff and providing references.
- The administration and management of organisations such as the Christ's Hospital Foundation, Christ's Hospital Enterprises Limited (CHEL) and the CH Theatre Box Office.
- The fulfilment of CH's contractual and other legal obligations.

Processing of personal data

11. CH will only process personal data for the purpose(s) for which it was originally acquired or which have subsequently been notified to the data subject(s) and will not process it for any other purpose without the data subject's permission, unless it is permitted to do so under the GDPR or if it is required to do so by law.

12. Personal data will only be disclosed to or shared with those members of staff, agents and suppliers who need to access the personal data to carry out the purpose(s) for which it was acquired. CH employs appropriate security measures to ensure that personal data is kept secure and not accessed or processed without proper authority.

13. CH will not transfer personal data outside of the UK unless it is satisfied that the data subject's rights under the GDPR will be adequately protected.

14. CH will seek permission from an individual and, in the case of a student, his or her parents before allowing that person to feature particularly prominently in any films, books or articles for which CH may give permission.

15. When processing personal data for the purposes set out above CH may communicate by post, email and telephone and may make use of cloud computing services.

Third parties with whom CH may need to share personal data

16. From time-to-time CH may pass personal data (including special category data where appropriate) to third parties, who will process this data. Where we do so, we will ensure that the required data sharing provisions are in place, these being where we are required to share by law, data sharing terms and conditions, an exemption, an adequacy decision or appropriate safeguards. Instances such as:

    - to enable the relevant authorities to monitor the school's performance;
    - to compile statistical information (normally using anonymised data);
    - to secure funding towards the charitable mission of CH, such as using Buffalo Fundraising Consultants Ltd to assist with fundraising campaigns;
    - to safeguard students' welfare and provide appropriate pastoral (and, where relevant, medical) care;

- where specifically requested by students and/or their parents or guardians;
- where necessary in connection with learning and co-curricular activities undertaken by students;
- to enable students to take part in public examinations and other assessments and to monitor their progress and educational needs;
- to obtain appropriate professional advice and insurance for the organisation;
- where a reference or other information about a student or Old Blue is requested by another educational establishment or employer to whom they have applied;
- to provide CH with a data processing service;
- where reasonably necessary for the operation of CH and employment of its staff.

17. CH may also share personal data about Old Blues internally with the Christ's Hospital Old Blues Association (CHOBA), the Benevolent Society of Blues (BSB) and similar associated organisations, which may contact Old Blues from time to time by post, email and telephone. All such processing will be conducted while ensuring that the data subject's rights under the GDPR are adequately protected.

Consent to process data

18. The majority of the data held by CH on individuals is provided by the data subjects themselves and so was given with their full consent. Most of the forms used to gather data, such as Admissions forms, Bursary forms, job application forms, web site enquiry forms and so on make this clear. The information obtained in this way will not be processed for any other purpose than that for which it was gathered without the express consent of the data subjects concerned unless we are under a legal obligation to do so.

19. CH is conscious that data subjects may, at any time, wish to withdraw their consent, given previously, for the processing of data and so any individual who wishes to withdraw their consent should indicate this to the department which initially gathered the data concerned.

Accuracy of data

20. CH will endeavour to ensure that all personal data held in relation to data subjects is accurate and up to date. However, individuals must notify the organisation of any changes to the information held about them.

Security of data

21. CH will implement technical and organisational measures to ensure that personal data is kept secure and is only accessed by authorised individuals for the purposes for which it is retained. Further information on these measures is set out in the Information Security and Data Protection Policy.

Data Subject Rights, Enquiries, Concerns and Complaints

22. CH has appointed the Compliance Officer as its Data Protection Officer (DPO).

23. If a data subject has an enquiry or concern about the way in which CH has or will process their personal data, or wishes to enact any data subject right, they should contact the DPO:

dpo@christs-hospital.org.uk
Data Protection Officer
Counting House
Christ's Hospital
Horsham
West Sussex
RH13 0YP

24. If a data subject has a complaint about the way in which CH has or will process their personal data, they should raise this with the DPO who will, where appropriate, investigate the matter in accordance with the Data Protection Complaints Policy.

25. Data subjects also have the right to raise their concern or complaint with the Information Commissioner's Office (ICO); details of how to do so can be found on the ICO web site: https://ico.org.uk

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