



DEAN CLOSE FOUNDATION

The Dean Close Foundation

Independent, Co-educational, Day and Boarding School

Data Protection Policy (W008)

Registered Charity No: 1086829

Date of Issue: Oct 20
Review Date: Oct 23
Owner: Bursar

THE DEAN CLOSE FOUNDATION

DATA PROTECTION POLICY

- This policy has been authorised by the Trustees of The Dean Close Foundation (the "Charity") for all of its schools, (the "School").
- This policy will be reviewed periodically by the Bursar (or the Finance and General Purpose Committee) on behalf of the Board of Trustees.
- The School is registered under the Data Protection Act.
- It is useful to also read the separate Retention of Records Policy and the Foundation Privacy Notice.

About this policy

1. Everyone has rights with regard to the way in which their personal data is handled. During the course of the Schools activities it collects, stores and processes personal data about staff, pupils, their parents, suppliers and other third parties, and it is recognised that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.
2. Those who are involved in the processing of personal data are obliged to comply with this policy when doing so. Any breach of this policy may result in disciplinary action.
3. This policy sets out the basis on which the School will process any personal data we collect from data subjects, or that is provided to us by data subjects or other sources. It does not form part of any employee's contract of employment and may be amended at any time.

General Statement of the School's Duties

4. The School is required to process relevant personal data regarding workers as part of its operation and shall take all reasonable steps to do so in accordance with this Policy.

Enquiries to the Data Protection Controller

5. The Data Controller is deemed to be The Dean Close Foundation. The Bursar is the person nominated to deal with Data Protection issues in the School and for the purposes of the Data Protection Act.
6. Information about the implementation of the School's Data Protection Policy is available from the Bursar. General information about the Data Protection Act can be obtained from the Information Commissioner's Office (0303 123 1113 or 01625 545 745, www.ico.gov.uk).

The Principles

Anyone processing personal data must comply with the eight enforceable principles of good practice as enshrined within the EU General Data Protection Regulations enacted in the UK by the Data Protection Act 2018. These provide that personal data must be: -

- Fairly and lawfully processed
- Processed for a lawful purpose
- Adequate, relevant and not excessive
- Accurate and up to date
- Not kept for longer than necessary
- Processed in accordance with the data subject's rights
- Subject to technical and organisational controls to prevent unauthorised processing
- Not transferred to other countries without adequate protection

Personal Data

Personal data covers information relating to identifiable individuals, known as Data Subjects, such as job applicants, current and former employees, agency, contract and other staff, pupils and their parents, suppliers and marketing and business contacts. It includes expressions of opinion about the individual, any indication of someone else's intentions towards the individual, information necessary for employment such as the worker's name and address and details for payment of salary.

Processing of Personal Data

The Schools policy is to process personal data in accordance with the applicable data protection laws as set out above. All staff have a personal responsibility for the practical application of this policy.

Staff should generally not process personal data unless:

- The processing is otherwise in the Schools legitimate interests and does not unduly prejudice the individual's privacy;
- The individual whose details are being processed has consented to this, or
- The processing is necessary to perform the Schools legal obligations or exercise legal rights.

When gathering personal data or establishing new data protection activities, staff should ensure that individuals whose data is being processed receive appropriate data protection notices to inform them how the data will be used. There are limited exceptions to this notice requirement. In any case of uncertainty as to whether a notification should be given, staff should contact the Bursar.

Sensitive Personal Data

The School may, from time to time, be required to process sensitive personal data regarding a Data Subject. Where sensitive personal data is processed by the School, the explicit consent of the Data Subject will generally be required in writing. When the Data Subject is a pupil depending on the age of the pupil and the circumstances it may not be the Parent of Guardian who is seen as the Data Subject.

To be appropriate this consent should be informed, which means it needs to identify the relevant data, why it is being processed and to whom it will be disclosed and be given by positive assertion. This consent can be withdrawn at any time. Staff should contact the Bursar for more information on obtaining consent to process sensitive personal data.

Processing of Credit Card Data

The School complies with the requirements of the PCI Data Security Standard (PCI DSS). Staff who are required to process credit card data must ensure that they are aware of and comply with the most up to date PCI DSS requirements. If you are unsure in this regard please seek further guidance from the Bursar.

Accuracy, adequacy, relevance and proportionality

Staff should make sure data processed by them is accurate, adequate, relevant and proportionate for the purpose for which it was obtained. Personal data obtained for one purpose should not be used for unconnected purposes unless the individual has agreed to this or would otherwise reasonably expect the data to be used in this way.

Individuals may ask the School to correct personal data relating to them which they consider to be inaccurate. If a member of staff receives such a request and does not agree that the personal data held is inaccurate, they should nevertheless record the fact that it is disputed and inform the Bursar.

Staff must ensure that personal data held by the School relating to them is accurate and updated as required. If personal details or circumstances change, staff should inform the Bursar so the School's records can be updated.

Rights of Individuals

Data Subjects have the right of access to information held by the School, subject to the provisions of the Data Protection Act 1998 (as amended). Any Data Subject wishing to access their personal data should make their requests to the Bursar. The School will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event, within one calendar month. The information will be imparted to the data subject as soon as is reasonably possible after it has come to the School's attention. It should be noted that there are certain restrictions on the information to which individuals are entitled under applicable law.

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Staff should not send direct marketing material to someone electronically (e.g. by email) unless there is an existing business relationship with them in relation to the services being marketed. Staff should abide by any request from an individual not to use their personal data for direct marketing purposes and should notify the Bursar about any such request. Staff should contact the Bursar for advice on direct marketing before starting any new direct marketing activity.

Exemptions

Certain data is exempted from the provisions of the Data Protection Act which includes the following:-

- The prevention or detection of crime;
- The assessment of any tax or duty;
- Where the processing is necessary to exercise a right or obligation conferred or imposed by law upon the School.

The above are examples only of some of the exemptions under the Act. Any further information on exemptions should be sought from the Bursar.

Accuracy

The School will endeavour to ensure that all personal data held in relation to data subjects is accurate and kept up to date. Data subjects must notify the Bursar of any changes to information held about them. A Data subject has the right to request that inaccurate information about them is erased.

Timely Processing

The School will not keep personal data longer than is necessary for the purpose or purposes for which they were collected and will take all reasonable steps to destroy, or erase from its systems, all data which is no longer required. The School will comply with the retention requests of the IICSA.

Enforcement

If a data subject believes that the School has not complied with this Policy or acted otherwise than in accordance with the Data Protection Act, the data subject should utilise the School grievance procedure and should also notify the Bursar.

Data Security

The School must ensure that appropriate security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data. This is in relation to data belonging to both staff and pupils. As such, no member of staff is permitted to remove personal data from School premises, whether in paper

or electronic form and wherever stored, without prior consent of the Warden, a Headmaster or the Bursar. Where a worker is permitted to take data offsite it will need to be encrypted.

APPENDIX 1

REQUEST FOR ACCESS TO PERSONAL DATA

Enquirer's Surname.....

Enquirer's Forenames.....

Enquirer's Address

.....

.....

.....

Enquirer's Postcode

Telephone Number

Are you the person who is the subject of the records you are enquiring about (i.e. the "Data Subject")?

YES / NO

If NO:

Do you have parental responsibility for the child/children who is/are the "Data Subject(s)" of the records you are enquiring about?

YES / NO

If YES:

Names of child/children about whose personal data records you are enquiring:

.....

.....

.....

.....

Description of Concern / Area of Concern:

Description of Information or Topic(s) Requested:

Additional Information:

DATA SUBJECT DECLARATION

I request that the School search its records based on the information supplied under the right of access by the data subject within the General Data Protection Regulation and provide a description of the personal data found from the information described in the details outlined above relating to me (or my child/children) being processed by the School.

I agree that the reply period will be within one month of receipt of the request. This can be extended by a further two months if the request is complex or a number of requests have been made.

I consent to the reply being disclosed and sent to me at my address above.

Signature of "Data Subject" (or Subject's Parent)

.....

Name of "Data Subject" (or Subject's Parent)

(PRINTED).....

Dated

The Dean Close Foundation

PRIVACY NOTICE

For the purposes of Data Protection legislation the Data Controller is deemed to be The Dean Close Foundation (the Foundation) incorporating Dean Close Senior School, Dean Close Prep School, Dean Close Pre-prep School, Dean Close St Johns and Dean Close Nurseries.

The Foundation address:-

The Dean Close Foundation
Shelburne Rd
Cheltenham
GL51 6HE
Charity Number 1086829
Company Number 4193948

The Dean Close Foundation also includes Dean Close Services Limited which is covered by a separate Privacy Notice.

WHAT THIS PRIVACY NOTICE IS FOR

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

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff, parents and pupils are all encouraged to read this Privacy Notice and understand the Foundation's obligations to its entire community.

This **Privacy Notice** applies alongside any other information the Foundation may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This **Privacy Notice also** applies in addition to the Foundation's other relevant terms and conditions and policies, including:

- any contract between the setting and its staff or the parents of pupils;
- the individual setting's Photography, Filming and Recording policy;
- the individual setting's Security, Access Control Workplace Safety and Lone working policy
- the individual setting's Retention of Records policy;

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- the individual setting's Recruitment, Selection and Disclosure policy
- the individual setting's Safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the individual setting's IT policies, including its Acceptable Use of IT policy and eSafety policy.

Anyone who works for, or acts on behalf of, the Foundation (including staff, volunteers, governors and service providers) should also be aware of and comply with the Foundation data protection policy, which also provides further information about how personal data about those individuals will be used.

RESPONSIBILITY FOR DATA PROTECTION

The Bursar or Operations Bursar will be able to deal with all your requests and enquiries concerning the Foundation's use of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law.

The Bursar and Operations Bursar can be contacted on the following telephone numbers 01242 258086 / 01242 267414 and email addresses bursary@deanclose.org.uk / spewence@deanclose.org.uk.

WHY THE FOUNDATION NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to staff, pupils and parents, the Foundation needs to process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of its daily operation.

Some of this activity the Foundation will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with its staff, or parents of its pupils.

Other uses of personal data will be made in accordance with the Foundation's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

The Foundation expects that the following uses will fall within that category of its (or its community's) "**legitimate interests**":

- For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents) including to undertake recruitment from outside the EEA while complying with our obligations as a Tier 4 Sponsor;
- To provide childcare and education services, including musical education, physical training or spiritual development, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Maintaining relationships with alumni and the Foundation community, including direct marketing or fundraising activity;

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- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
- To enable relevant authorities to monitor the Foundation's, or individual settings, performance and to intervene or assist with incidents as appropriate;
- 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 individual settings or the Foundation;
- To safeguard pupils' welfare and provide appropriate pastoral care;
- To monitor (as appropriate) use of the individual settings IT and communications systems in accordance with the Foundation's IT: acceptable use policy;
- To make use of photographic images of pupils in individual settings or Foundation publications, on the individual settings or Foundation website and (where appropriate) on the individual settings or Foundation social media channels in accordance with the Foundation's policy on taking, storing and using images of children;
- For security purposes, including CCTV in accordance with the settings CCTV policy;
- To investigate or cooperate with any school or nursery in the investigation of external complaints, disciplinary, grievance or other investigation process; and
- Where otherwise reasonably necessary for the individual settings or Foundation purposes, including to obtain appropriate professional advice and insurance.

In addition, the individual settings or Foundation will on occasion need to process special category personal data (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS and other checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons will include:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of educational or recreational trips who need to be made aware of dietary or medical needs;
- To provide educational services in the context of any special educational needs of a pupil;

- To provide spiritual education in the context of any religious beliefs;
- In connection with employment of its staff, for example DBS checks, welfare, union membership or pension plans;
- As part of any individual settings, Foundation or external complaints, disciplinary or investigation process that involves such data, for example if there are SEN, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

TYPES OF PERSONAL DATA PROCESSED BY THE FOUNDATION

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);
- bank details and other financial information, e.g. about parents who pay fees to the school;
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- personnel files, including in connection with academics, employment or safeguarding;
- where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- references given or received by the individual settings or Foundation about pupils, and relevant 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; and
- images of pupils (and occasionally other individuals) engaging in school/nursery activities, and images captured by the school's CCTV system (in accordance with the Foundation's policy on Photography, Filming and Recording);

HOW THE SCHOOL COLLECTS DATA

Generally, the individual settings or Foundation receive personal data from the individual directly (including, in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

However in some cases personal data will be supplied by third parties (for example another school/nursery, or other professionals or authorities working with that individual)

WHO HAS ACCESS TO PERSONAL DATA AND WHO THE FOUNDATION SHARES IT WITH

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Occasionally, the individual settings or Foundation will need to share personal information relating to its community with third parties, such as:

- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- government authorities (e.g. HMRC, DfE, police or the local authority); and
- appropriate regulatory bodies

For the most part, personal data collected by the **individual settings or Foundation** will remain within the Foundation, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- medical records held and accessed only by the school doctor and appropriate medical staff under his/her supervision, or otherwise in accordance with express consent; and
- pastoral or safeguarding files.

However, a certain amount of any SEN pupil's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

In addition individual settings will provide pupil information to the next natural education provider in the Foundation, ie Dean Close Pre-Prep will share the data of a pupil approaching leaving age with the Dean Close Prep School and so on.

Staff, pupils and parents are reminded that the individual settings and Foundation are under duties imposed by law and statutory guidance (including [Keeping Children Safe in Education](#)) 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 is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO or police. For further information about this, please view the Foundation's Safeguarding Policy.

Finally, in accordance with Data Protection Law, some of the individual settings or Foundation processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the individual settings or Foundation specific directions.

HOW LONG WE KEEP PERSONAL DATA

The Foundation will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary staff and pupil personnel files is up to 7 years following departure from the individual **settings**. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements. Certain personal data contained within individual setting's registers or publications, for example labelled photographs, production or

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music programmes, or individual work may be retained within the Archives for historical purposes.

The Foundations Retention of Records Policy; in line with the ongoing Independent **Inquiry** into Child **Sexual Abuse** (IICSA), led by Prof. Alexis Jay, the Dean Close Foundation have amended the Retention of Records Policy to reflect the instruction to retain until further notice, all pupil and staff documentation.

If you have any specific queries about how our retention 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. However, please bear in mind that the Foundation will often have lawful and necessary reasons to hold on to some personal data even following such request. A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where 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 (called a "suppression record").

KEEPING IN TOUCH AND SUPPORTING THE FOUNDATION

The individual settings or Foundation will use the contact details of parents, alumni and other members of the community to keep them updated about the activities of the Foundation, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the Foundation will also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the Foundation community, such as the Old Decanians and the Old Johnians.
- Contact parents and/or alumni by post and email in order to promote and raise funds for the individual settings or Foundation;
- Should you wish to limit or object to any such use, or would like further information about them, please contact the Bursar in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the Foundation is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

YOUR RIGHTS

- [Rights of access, etc.](#)

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the individual settings or Foundation, and in some cases ask for it to be erased or amended or have it transferred to others, or for the individual settings or Foundation to stop processing it – but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the Bursar.

The Foundation will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is one month in the case of requests for access to information).

The Foundation will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the Foundation may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

- Requests that cannot be fulfilled

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

The Foundation 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 given by the individual settings or Foundation itself for the purposes of the education, training or employment of any individual.

You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

- Pupil requests

Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the Foundation, they have sufficient maturity to understand the request they are making (see section **Whose Rights?** below). A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

Indeed, while a person with parental responsibility will generally be entitled 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.

Pupils aged 13 or 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.

Parental requests, etc.

It should be clearly understood that the rules on 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 Foundation may consider there are lawful grounds for sharing with or without reference to that pupil.

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

- Consent

In the very specific circumstances where the Foundation 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 Foundation may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

Indeed as previous mentioned the vast majority of the Foundation's processing activity is undertaken using legitimate interest as the legal basis.

- Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates. However, the individual settings or Foundation will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils – for example, under the parent contract, or via a form. Parents and pupils should be aware that this is not necessarily the same as the school relying on strict consent (see section on Consent above).

Where consent is required, it may in some cases be necessary or appropriate – given the nature of the processing in question, and the pupil's age and understanding – to seek the pupil's 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 Foundation 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 the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare. That is unless, in the Foundation's opinion, there is a good reason to do otherwise.

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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 Foundation may be under an obligation to maintain confidentiality unless, in the Foundation's opinion, there is a good reason to do otherwise; for example where the Foundation believes disclosure will be in the best interests of the pupil or other pupils, or if required by law.

Pupils are required to respect the personal data and privacy of others, and to comply with the individual settings Acceptable use of IT Policy and the settings rules.

DATA ACCURACY AND SECURITY

The Foundation 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 please notify the Bursar of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the Foundation may need to process your data, and who you may contact if you disagree.

The individual settings and Foundation will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to individual settings or Foundation systems. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

THIS POLICY

The Foundation 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. In any event the latest version will always be on our web site.

QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to the Bursar.

If an individual believes that the Foundation has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the individual school's or Foundation [complaints / grievance] procedure and should also notify the Bursar. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the Foundation before involving the regulator.

[11/02/2020]

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