Privacy Notice

APPLIES TO: **Shrewsbury Family of Schools**

Dated: **September 2026**

Shrewsbury
FAMILY OF SCHOOLS

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PRIVACY NOTICE

1. Who we are

Please note: This Privacy Notice is prepared in accordance with the UK GDPR, the Data Protection Act 2018, and Keeping Children Safe in Education (KCSIE).

For the purposes of Data protection legislation, the 'Data Controller' is Shrewsbury School, SY3 7BA. Our data protection registration number is **Z5306330**

This Privacy Notice is applicable to all the activities of the following organisations and associated bodies:

- Shrewsbury School, The Schools, Shrewsbury, SY3 7BA. Registered Charity Number 528413.
- Packwood Haugh School, Ruyton XI Towns, Shrewsbury, SY4 1HX (part of Registered Charity Number 528413)
- Terra Nova School, Jodrell Bank, Cheshire, CW4 8BT (part of Registered Charity Number 258413
- The Salopian Club, The Schools, The Schools, Shrewsbury, SY3 7BA.
- The Old Packwoodian Society, Ruyton XI Towns, Shrewsbury, SY4 1HX

The following organisations have separate privacy notices

- Shrewsbury School Foundation, The Schools, SY3 7BA. [**ZA511032]** Registered Charity Number 528415
- Shrewsbury School Trading Company Limited, The Schools, Shrewsbury, SY3 7BA. Company registration 05580019. **[ZA511020]**
- Shrewsbury School Enterprises Limited, The Schools, Shrewsbury, SY3 7BA. Company registration 04535585. **[ZA511016]**

2. What this policy is for

This policy is intended to provide information about how the School will 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 in accordance with the rights of individuals under Data Protection Law to understand how their data is used. Staff, parents and pupils are all encouraged to read this Privacy Notice and understand the School's obligations to its entire community.

This **Privacy 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.

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

- any contract between the School and its staff or the parents of pupils;
- the School's data policies, including policies on taking, storing and using images of children;
- the School's policy on CCTV (Data Retention policy);
- the School's Data Security policy;
- the School's Child Protection and Safeguarding and health and safety policies, including how concerns or incidents are recorded; and
- the School's IT policies, including its pupil and non-pupil Acceptable Use policies, Online Safety policy, Social Media Policy and Device for Learning policy.

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

3. Responsibility for data protection

The School and associated bodies have appointed the COO as **Privacy and Compliance Officer** who will deal with all your requests and enquiries concerning the School's uses 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 Chief Operating Officer
Shrewsbury School
The Schools
SY3 7BA

01743 280820
COO@shrewsbury.org.uk

The Director of Digital & Data Services acts as operational lead for information security and data governance in support of the Privacy and Compliance Officer.

Initial enquires related to Packwood Haugh and Terra Nova data should be directed to the COO of Shrewsbury School in the first instance.

4. Why the school needs to process personal data

Each processing activity is linked to a lawful basis: for example, safeguarding = legal obligation, fundraising = consent/legitimate interests, employment = contract/legal obligation.

To carry out its ordinary duties to staff, pupils and parents, the School may 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 School 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 School's legitimate interests, or the legitimate interests of another, if these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data.

The School expects that the following uses may 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);
- To provide education services, including musical education, physical training (including swimming lessons) or spiritual development, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Provision of commercial services such as hosting holiday camps, provision of swimming lessons, the promotion of performing arts events, and the organisation of sporting competitions on the school site;
- Maintaining relationships with alumni and the school community, including direct marketing or, except in the case of the Salopian Club, fundraising activity;
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests;
- Information obtained from publicly available sources may include professional profiles, company information, published biographies, directorships, charitable interests and publicly available wealth indicators where lawful and proportionate in order to:
    - ensure our communications are relevant to you and your interests
    - to facilitate inclusion in all activities and events that our research helps us understand you may be interested in and
    - to maximise the School's philanthropic goals;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as diversity or gender pay gap analysis and taxation records);
- To enable relevant authorities to monitor the School's 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 School;
- To safeguard pupils' welfare and provide appropriate pastoral care;
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's *IT Acceptable Usage policies*;
- 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 policy on taking, storing and using images of children;
- For security purposes, including CCTV in accordance with the School's CCTV policy;
- Organise transport to/from school at start and end of terms, Exeats and coach weekends; and
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School;
- Where appropriate, names and contact details of visitors to the School site, including pupils visiting from other schools for competitions or feeder school events.
- Marketing communications are conducted in accordance with the Privacy and Electronic Communications Regulations (PECR) as well as UK GDPR.

In addition, the School may 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 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 may 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 where it is

in the individual's interests to do so: for example, for medical advice, social services, insurance purposes or to organisers of school trips;
- 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 or pension plans;
- To run any of its systems that operate on biometric data, such as for security and other forms of pupil or staff identification; 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;
- DBS information for trustees or volunteers.

5. Types of personal data processed by the School

Please note: The School maintains a data retention schedule for categories of data such as pupil files, safeguarding records, CCTV, HR, and finance data, aligned with legal and regulatory requirements.

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 and about staff for payroll purposes;
- 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 (in accordance with the school's policy on taking, storing and using images of children & the CCTV policy).
- CCTV footage may be used for safeguarding, crime prevention, health and safety, disciplinary investigations and the protection of School property.
- The School monitors the use of its IT systems, email, internet access and school-owned devices for safeguarding, cybersecurity, compliance and operational purposes.

6. How the School collects data

The School receives personal data from the individual directly (including, in the case of pupils, from their parents). This will be via a series of forms, in the ordinary course of interaction and communications such as letters, emails or written assessments.

Personal data may also be supplied by third parties (for example another school, or other professionals or authorities working with that individual), collected from publicly available resources or from previous schools/employers in the case of staff.

7. Who has access to personal data and who the school shares it with

Please note: Categories of third-party processors include the Management Information System (MIS), safeguarding systems, learning platforms, and cloud storage services. All third-party processing is governed by GDPR Article 28 safeguards.

Occasionally, the School will need to share personal information relating to its community with third parties, such as professional advisers (lawyers and accountants) or relevant authorities (HMRC, police or the local authority). The School may also share limited pupil details, such as name, email address, year group etc with selected third parties for the purposes of providing access to academic resources, extra-curricular activities e.g. MOD (CCF) and Duke of Edinburgh, external tutors and coaches and limited contact information with transport companies or taxi firms where arranging transport on a parent or pupils' behalf.

The School recognises that children's personal data requires special protection and takes additional measures to ensure that information relating to pupils is processed fairly, securely and transparently.

Details of food allergies or other relevant information may be shared with third party caterers and other schools where necessary to ensure safe delivery of catering or other services.

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

- medical records held and accessed by authorised healthcare professionals and other staff with a legitimate need to know; and
- pastoral or safeguarding files.

Medical information may also be supplied to the School doctor's NHS practice via the NHS secure link.

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

Staff, pupils and parents are reminded that the School is 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 may 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 School's *Child Protection and Safeguarding Policy*.

Finally, in accordance with data protection law, some of the School's 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 School's specific directions.

Some of the School's service providers may process personal data outside the United Kingdom. Where this occurs, the School will ensure that appropriate safeguards are in place, including adequacy regulations, International Data Transfer Agreements (IDTAs), or other approved mechanisms.

The School does not routinely make decisions about individuals solely through automated processing. If this changes, individuals will be informed of the relevant processing and their rights.

8. How long we keep personal data

A detailed retention schedule is published, setting out retention for each data category. Safeguarding data is retained indefinitely in line with IICSA guidance.

The School 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 pupil files is up to 7 years following departure from the School (or until age 25, whichever is the later, in the case of pupils).

However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements. The Independent Enquiry into Child Sexual Abuse (IICSA) gives guidance on this matter and any data relating to actual or suspected child sexual abuse must be retained indefinitely.

If you have any specific queries about how this policy is applied or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact The COO, **coo@shrewsbury.org.uk**. However, please bear in mind that the School may have lawful and necessary reasons to hold on to some data.

The School's policy on Data Retention is contained within Appendix C of the Data Policies document. When personal data is no longer required, it will be securely destroyed or anonymised in accordance with the School's retention schedule.

9. Dedicated Lawful Basis Table

Activity	Lawful Basis
Education provision	Contract / Legitimate Interests
Safeguarding	Legal Obligation / Vital Interests
Employment administration	Contract / Legal Obligation
Payroll and pensions	Legal Obligation
Alumni relations	Legitimate Interests
Fundraising communications	Legitimate Interests and/or Consent
School photography	Legitimate Interests and/or Consent
CCTV	Legitimate Interests

10. Keeping in touch and supporting the School

The School and organisations listed above will use the contact details of parents, alumni and other members of the school community to keep them updated about the activities of the School, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, 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, such as the Shrewsbury School Foundation, The Salopian Club, Shrewsbury School Parents' Association (SSPA);
- Contact parents and/or alumni (including via the Foundation, Salopian Club, SSPA) by post and email to promote and raise funds for the School;
- Information obtained from publicly available sources may include professional profiles, company information, published biographies, directorships, charitable interests and

publicly available wealth indicators where lawful and proportionate, in order to maximise the School's fundraising potential;
- The School will always balance its legitimate interests against the privacy rights of individuals.

Should you wish to limit or object to any such use, or would like further information about them, please contact the COO in writing. You always have the right to withdraw consent, where given, or otherwise opt out of direct marketing or fundraising.

However, the School may need nonetheless to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number). All digital marketing is carried out in compliance with the Privacy and Electronic Communications Regulations (PECR). Individuals may withdraw consent or opt out at any time.

11. Your rights

Individuals have various rights under data protection law to access and understand personal data about them held by the School, and in some cases ask for it to be erased or amended or for the School 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 COO. Where personal data is processed outside the UK, safeguards such as adequacy decisions or standard contractual clauses will apply to protect individuals' rights.

The School 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 School will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, the School may ask you to reconsider or charge a proportionate fee, but only where data protection law allows it.

You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal professional privilege. The School is also not required to disclose any pupil examination scripts (though examiners' comments may fall to be disclosed), nor any confidential reference given by the School for the purposes of the education, training or employment of any individual.

You have the right to:

- Access your information
- Correct inaccurate information
- Request deletion where appropriate
- Restrict processing
- Object to processing
- Data portability
- Withdraw consent
- Complain to the ICO

12. Pupil requests

Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the School, they have sufficient maturity to understand the request they are making (see section *Whose Rights* below).

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger pupils, the information in question is always considered to be the child's at law.

A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf. Moreover (if of sufficient age) their consent or authority may need to be sought by the parent making such a request. Pupils *aged 13 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.

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

13. 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. an employment or parent contract, or because a purchase of goods, services or membership of an organisation such as an alumni or parents' association has been requested).

14. Whose rights

The rights under data protection law belong to the individual to whom the data relates. However, the School will often rely on parental consent to process personal data relating to pupils (if consent is required) 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, 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 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, 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 may be under an obligation to 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, or if required by law.

Pupils are required to respect the personal data and privacy of others, and to comply with the School's *Pupil IT Acceptable Usage Policy* and the School Rules. Staff are under professional duties to do the same covered under the relevant *Non-Pupil IT Acceptable Usage* and staff policies.

15. 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 please notify the COO 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 School may need to process your data, of who you may contact if you disagree.

The School 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 school systems. Security measures include encryption, multi-factor authentication, staff training, and adherence to ICO breach reporting procedures. All staff and governors will be made aware of this policy and their duties under data protection law and receive relevant training.

In the event of a personal data breach, the School will follow its Data Breach Procedure and, where required, notify affected individuals and the Information Commissioner's Office in accordance with UK GDPR requirements.

16. Artificial Intelligence and Emerging Technologies

The School may use approved artificial intelligence, automation and analytical tools to support educational, administrative and operational activities. No personal data will be processed through such systems unless appropriate contractual, technical and organisational safeguards are in place.

Personal, safeguarding, health or other special category data will not be entered into public AI systems unless specifically authorised and protected by appropriate legal arrangements.

17. This policy

The School 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.

18. Queries and complaints

Any comments or queries on this policy should be directed to the COO using the following contact details.

The Chief Operating Officer
Shrewsbury School
The Schools
SY3 7BA

01743 280820
coo@shrewsbury.org.uk

If an individual believes that the School has not complied with this policy or acted otherwise than in accordance with data protection law, they should utilise the school complaints procedure and should also notify the COO. The individual 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 school before involving the regulator.

Owner: ND - Chief Operating Officer
Reviewed September 2026
Next review September 2027