



**GORDONSTOUN**

# **DATA PROTECTION POLICY**

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**Approved By**

**Finance Director  
Revised and updated 28 June 2018**

**All Gordonstoun policies and procedures are reviewed annually as a minimum**

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## Overview

Gordonstoun Schools Limited, a registered charity registered in Scotland with charity number SC037867 and whose registered office is at c/o Veale Wasborough Vizards, Barnards Inn, 86 Fetter Lane, London, EC4A 1AD, (the "School") is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. This policy explains how we do that in a way that is compliant with the General Data Protection Regulation (GDPR).

## Purpose

This policy explains the general principles that will be used by Gordonstoun in processing data and how you can complain if you feel that we have used your data incorrectly. The appendices explain, for specific types of data, how and why personal data will be used and how long it will usually be retained for.

## Data Protection Principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

## General Statement

The school is committed to maintaining these principles and will therefore:

- Inform individuals why the information is being collected when it is collected
- Inform individuals when their information is shared, and why and with whom it was shared
- Check the quality and accuracy of the information it holds
- Ensure the information is not retained for longer than necessary
- Ensure that when obsolete information is destroyed that it is done so appropriately and securely
- Ensure that clear and robust safeguards are in place to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded
- Share information with others only when it is legally appropriate to do so
- Set out procedures to ensure compliance with subject access requests
- Ensure our staff are aware of and understand our policies and procedures.

## Complaints

Complaints will be dealt with in accordance with the school's complaints policy. Complaints relating to information handling may be referred to the Information Commissioner (the statutory regulator)

## Contacts

If you have any enquiries regarding this policy, please contact [GDPR@gordonstoun.org.uk](mailto:GDPR@gordonstoun.org.uk)

## Admissions Privacy Notice

### What is the purpose of this document?

Gordonstoun Schools Limited, a registered charity registered in Scotland with charity number SC037867 and whose registered office is at c/o Veale Wasborough Vizards, Barnards Inn, 86 Fetter Lane, London, EC4A 1AD, (the “School”) is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you have made an admissions enquiry to the school. It makes you aware of how and why your personal data will be used, namely for the purposes of the admissions, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

### Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

### The kind of information we hold about you

In connection with your admissions enquiry with us, we will collect, store, and use the following categories of personal information about you:

- For parents or guardians: the information you have provided on our admissions enquiry form, including name, title, address, telephone numbers, personal email address, and any information you provide on the means testing form, including your personal financial information and any other information you provide voluntarily.
- For prospective pupils: date of birth, gender, education history and photographs from prospective student events.
- For both parents/guardians and prospective pupils, any information you provide to us during an interview.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs.
- Information about your health, including any medical condition, health and sickness records.
- Information about any special educational needs.

### How is your personal information collected?

We collect personal information about prospective pupils from the following sources:

- You, the prospective pupil and parent/ guardian.
- Your current School, if applicable, from whom we collect the following categories of data: educational attainment; any conduct or other relevant behavioural issues with your current school.

### **How we will use information about you**

We will use the personal information we collect about you to:

- Assess the prospective pupil's suitability for attendance at the School.
- Communicate with the parents or guardians about the admissions process.
- Keep records related to our admissions processes.
- Comply with legal or regulatory requirements.

It is in our legitimate interests to decide whether to admit the prospective pupil, since it would be beneficial to the School to admit appropriate applicants.

We also need to process your personal information to decide whether to enter into a parental contract with you.

Having received your admissions form, we will then process that information to decide whether you meet the requirements to be considered for admission to the School. If you do, we will decide whether to invite you for a visit and interview (or skype). We will contact your current school to request information relating to your current educational attainment, any conduct or other relevant behavioural issues before confirming your admission.

We will use the information you have already provided us with and any further information you provide us at the interview to decide whether to offer you admission to the School.

### **If you fail to provide personal information**

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of educational attainment), we will not be able to process your application successfully.

### **How we use particularly sensitive personal information**

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the admissions process, for example whether adjustments need to be made during an interview.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, to ensure meaningful equal opportunity monitoring and reporting.

### **Automated decision-making**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

### **Data security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Director of Marketing and Admissions.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **Data retention**

#### **How long will you use my information for?**

We will retain your personal information for a period of six years after your child has passed school age. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against applicants on prohibited grounds and that we have conducted the

admissions exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

## **Rights of access, correction, erasure, and restriction**

### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact [GDPR@gordonstoun.org.uk](mailto:GDPR@gordonstoun.org.uk).

### **Right to withdraw consent**

When you completed the admissions form, you provided consent to us processing your personal information for the purposes of the admissions exercise. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact the Director of Marketing and Admissions. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

Our Finance Director oversees compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Finance Director. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

## Alumni and Stakeholder Privacy Notice

### What is the purpose of this document?

Gordonstoun Schools Limited, a registered charity registered in Scotland with charity number SC037867 and whose registered office is at c/o Veale Wasborough Vizards, Barnards Inn, 86 Fetter Lane, London, EC4A 1AD, (the “**School**”) is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. You have been sent a link to this privacy notice because you were a pupil at the school and/or the summer school, or are a parent of a pupil who came to the school and/or the summer school, or another stakeholder who has provided personal data in order to keep in touch with the school. It makes you aware of how and why your personal data will be used, namely for the purposes of keeping in touch, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

### Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

### The kind of information we hold about you

In order to keep in touch with you about events, giving, information, marketing and news, we will collect, store, and use the following categories of personal information about you:

- Any contact information you have provided, including name, title, address, telephone numbers, personal email address, contact preferences.
- Any other information you provide about yourself, including the company you work for, your interests, the people connected with you (including your friends and family) and the events you have attended.
- Other information about you that is in the public domain, for example information from articles in the press, on your own or your company’s website and on social media.

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your religious and political beliefs.
- Information about your health that is in the public domain or that you have given us voluntarily.
- Information about any special needs that is in the public domain or that you have given us voluntarily.

In addition, we keep an archive of personal data from when you were at school here. For more information on this, please see our privacy policy for students and former students.

### How is your personal information collected?

We collect personal information about former pupils from the following sources:

- You
- Your social media profiles and your or your company’s website
- Press articles

### **How we will use information about you**

We will use the personal information we collect about you to keep in touch with you regarding:

- Events
- Giving
- Information
- Marketing
- News

It is in our legitimate interests to keep in touch with you as a valued stakeholder of the school.

### **How we use particularly sensitive personal information**

We will use your particularly sensitive personal information in the following ways:

- We will use information about your health, disability status, religious, philosophical or moral beliefs, to ensure that we keep in touch with you about the subject areas you are most interested in and to ensure the communication we have with you is meaningful and appropriate.

### **Automated decision-making**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

### **Data security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Finance Director.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **Data retention**

#### **How long will you use my information for?**

We will retain your personal information for as long as you are an alumnus of the school or for 6 years from our last contact if you are a stakeholder in the school. We retain your personal information for this period so that we can keep in touch with you and so that if you contact the school later in your life we are able to engage with you in a meaningful way with the types of information mentioned above. Often we find that alumni and stakeholders have a high level of interest in the school that wains for periods (perhaps whilst they have very young children or grandchildren), after which they seek to re-engage.

If you are a stakeholder and we wish to retain your personal information on file, on the basis that we think you want to keep in touch, we will write to you separately after 6 years and give you an opportunity to opt out of receiving communications.

### **Rights of access, correction, erasure, and restriction**

#### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.



- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Director of Marketing and Admissions in writing.

### **Right to withdraw consent**

When you became an alumnus or stakeholder, you provided consent to us processing your personal information for the purposes of keeping in touch with you. You have the right to withdraw your consent for processing for that purpose at any time. To withdraw your consent, please contact the school's reception. Once we have received notification that you have withdrawn your consent, we will no longer process your application and, subject to our retention policy, we will dispose of your personal data securely.

Our Finance Director oversees compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Finance Director. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

## Employee Privacy Notice

### How your information will be used

As your employer, Gordonstoun Schools Ltd. needs to keep and process information about you for normal employment purposes. The information we hold and process will be for our management and administrative use only. We will keep and use it to enable us to run the school and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment ends and **after** you have left. This includes using information to enable us to comply with the employment contract, to comply with any legal requirements, pursue the legitimate interest of the school and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable, in some circumstances, to comply with our obligations and we will tell you about the implications of that decision.

### Who provides the information we hold

Much of the information we hold will have been provided by you, but some may come from other internal sources, such as your manager/Head of Department, or in some cases, external sources, such as referees.

### What sort of information do we hold?

The sort of information we hold includes your application form and references, your contract of employment and any amendments to it; correspondence with, or about you, for example, criminal records checks; letters to you about a pay rise or, at your request, a letter to a mortgage company or property company confirming salary; information needed for payroll, benefits and expenses purposes; contact and emergency contact details; records of holidays; sickness and other absence; records relating to your career history, such as training records, appraisals, other performance measures and where appropriate, grievance and disciplinary records.

You will, of course, be referred to in many school documents and records that are produced by you and your colleagues in the course of carrying out your duties and the business of the school.

Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used in order to comply with our health and safety and occupational health obligations – to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. We will also need this data to administer and manage statutory and company sick pay, and life insurance policies.

In addition we monitor computer and telephone/mobile telephone use as detailed in our ICT policy.

### Disclosing information about you to third parties

Other than mentioned as below, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you, for instance, we may need to pass on certain information to our pension schemes or insurance providers.

(Franchise/overseas travel/overseas business) In limited and necessary circumstances your information may be transferred outside of the EEA or to an international organisation to comply with our legal or contractual requirements. We shall have in place safeguards to ensure the security of your data.

### Data Retention

Your personal data will be stored indefinitely because it may be needed for child protection reasons or for us to use to defend ourselves in legal cases.

If, in the future we intend to process your personal data for a purpose other than that for which it was collected, we will ask your permission.

**Your rights**

Under the General Data Protection Regulations (GDPR) and The Data Protection Act 2018, (DPA) you have a number of rights with regard to your personal data. You have the right to request from us access to and rectification or erasure of your personal data, the right to restrict processing, object to processing, as well as, in certain circumstances, the right to data portability.

If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the GDPR or DPA 18 with regard to your personal data. If you have any concerns as to how your data is processed, then please contact the HR Manager.

## Student and Parent Privacy Notice

### What is the purpose of this document?

Gordonstoun Schools Limited, a registered charity registered in Scotland with charity number SC037867 and whose registered office is at c/o Veale Wasborough Vizards, Barnards Inn, 86 Fetter Lane, London, EC4A 1AD, (the “**School**”) is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. You are being sent a copy of this privacy notice because you are a student or a parent at the school. It makes you aware of how and why your personal data will be used, namely for the purposes of the school providing a service to you, and how long it will usually be retained for. It provides you with certain information that must be provided under the General Data Protection Regulation ((EU) 2016/679) (GDPR).

### Data protection principles

We will comply with data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

### The kind of information we hold about you

In order to provide services of education and education in a boarding environment, we will collect, store, and use the following categories of personal information and personal sensitive information about you:

- For parents or guardians: the information you have provided on our admissions form, including name, title, address, telephone numbers, personal email address, and any information you provide on the means testing form, including your personal financial information and any other information you provide voluntarily (including health information).
- For students: date of birth, gender, education history, personal history, academic results, academic work, information about your behaviour, information about your pastoral progress, information about your race, ethnicity, sexuality and political and religious beliefs, information about your health, including any medical condition and health (including mental health) and sickness records, information about any special educational needs, information about name changes, information that you provide voluntarily about your family and friends.

### How is your personal information collected?

We collect personal information about prospective pupils from the following sources:

- You, the pupil and parent/ guardian
- Your previous School, if applicable, from whom we collect the following categories of data: educational attainment; any conduct or other relevant behavioural issues with your current school
- Staff at Gordonstoun
- Medical professionals (with your permission)
- Exam boards
- Tutors
- Exchange schools

### **How we will use information about you**

We will use the personal and personal sensitive information we collect about you to provide services of education and education in a boarding environment, including providing pastoral care, which is regulated by the Care Inspectorate.

### **Automated decision-making**

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

### **Data security**

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from the Deputy Head Pastoral.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

### **Data retention**

#### **How long will you use my information for?**

- We have currently suspended the destruction of any data under the instruction of the Smith Inquiry.

### **Rights of access, correction, erasure, and restriction**

#### **Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.
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If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact [GDPR@gordonstoun.org.uk](mailto:GDPR@gordonstoun.org.uk).

### **Right to withdraw consent**

When you signed the parental contract, you provided consent to us processing your personal information for the purposes of us fulfilling our obligations under that contract. You have the right to withdraw your consent for processing for that purpose at any time, although that will have an impact on our ability to provide education and is likely to result in the withdrawal of you/ your child from the school. To withdraw

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your consent, please contact the Headmaster. Once we have received notification that you have withdrawn your consent, we will discuss the implications of this with you.

Our Finance Director oversees compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Finance Director. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.