

Parent and Pupil Privacy Notice

The purpose of this Privacy Notice is to explain how we collect, use, store, and protect your personal data, and to outline your rights in relation to that data under UK data protection law. It applies to Westminster Abbey Choir School pupils (current and former) and parents, guardians, or carers of pupils at Westminster Abbey Choir School.

Approval body:	WACS Finance and General Purpose Committee
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Individual responsible for review (role):	Data Protection Officer
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Version number:	2.1
Related Policies	• Data Protection Policy • CCTV Policy • Biometric Policy • Visitor Privacy Notice

Changes made since the last revision to this policy:

- Provides a more detailed overview of what personal data Westminster Abbey collects, stores, and processes about choir school parents and pupils.
- Updated to match the format of the Abbey's Privacy Notices.

Introduction:

This Privacy Notice tells you what to expect when Westminster Abbey (the “Abbey”) collects, processes, stores, and shares personal data. This notice is applicable to all Westminster Abbey Choir School pupils (prospective, current, and former) and parents of pupils at Westminster Abbey Choir School.

When we talk about ‘we’ and ‘us,’ we are referring to Westminster Abbey. For the purpose of this Notice, Westminster Abbey includes Westminster Abbey Choir School.

When we say “you”, we are referring to parents, guardians, and carers. A separate Child-Friendly Privacy Notice has been written for pupils to read.

We understand the importance of managing personal data lawfully, fairly, and transparently. We have written this statement so that you are fully informed and understand how we process your data and your child’s data and know what rights you and your child have as data subjects.

Westminster Abbey is registered as a data controller with the Information Commissioner’s Office (ICO). We are the controller for the personal information we collect and process unless stated otherwise.

This Privacy Notice applies alongside any other information Westminster Abbey Choir 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 policy on taking, storing and using images of children;
- the Abbey’s CCTV policy;
- The school’s Biometric Policy;
- the school’s Safeguarding, Pupil Welfare, First Aid & Medical Care, or Health and Safety Policies, including as to how concerns or incidents are recorded; and
- the school’s IT policies, including the Abbey’s Social Media policy, e-Safety policy, Staff Code of Conduct and cookie policy.

We will update this Privacy Notice periodically. We will notify the School Community if we make any substantive changes to this statement. You are also advised to review this Privacy Notice from time to time.

How to contact us

If you have any questions or concerns regarding this Privacy Notice, you can contact the Abbey’s Data Protection Officer at dataprotection@westminster-abbey.org or by writing to the following address:

Data Protection Officer
The Chapter Office
20 Dean’s Yard
LONDON
SW1P 3PA

What is personal data?

Personal data refers to any information that can be directly or indirectly attributed to an identifiable living individual. It does not include anonymous data.

Why do we collect and process personal data about pupils, parents, guardians, and carers?

In order to fulfil its duties to pupils (past, present, and prospective) parents and educational guardians, we need to process a wide range of personal data as part of the school's daily operations.

Under UK data protection law, we must have a "lawful basis" for collecting and using personal data. Depending on the processing activity, we rely on one of the following lawful bases for processing personal data about pupils and parents.

Article 6 (1) (b) - We need to process your or your child's personal data for the performance of a contract.

Article 6 (1) (c) - We are required to process your or your child's personal data because we have legal obligations which we must fulfill.

Article 6 (1) (d) - We process some personal data because it is necessary to protect an individual's vital interests.

Article 6 (1) (f) - In some cases, we have a legitimate interest in collecting your or your child's personal data because it benefits you or us and does so without materially affecting your personal rights or freedoms.

Sometimes, we rely on your consent to process your personal data (**Article 6 (1) (a)**). For example, when you complete optional forms or surveys or self-declare personal information.

Where we process personal data on the basis of legitimate interests, this is only done where those interests are not outweighed by the impact on individuals, and it does not involve special or sensitive types of data. We expect that the following uses will fall within that category of the School'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, extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Maintaining relationships with the school community and alumni, including direct marketing or fundraising activity;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as in relation to tax or diversity);
- 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 report to and liaise with parents about their child's progress, welfare and development including by way of regular reports and parents' evenings;

- To organise and manage meetings, events, and social engagements for pupils and parents;
- 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 use of the Internet/e-mail policy S18;
- To make use of photographic images of pupils in school publications, on the school website and (where appropriate) on the school's and Abbey'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 Abbey's wider policies;
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for the school's purposes, including obtaining appropriate professional advice and insurance for the school.

There are some instances when we may collect sensitive personal data (known as special category data). This may include personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, biometric data, data concerning health or sexual orientation.

When we process special category personal data, we also identify an additional lawful condition for processing from Article 9 (2) of the UK GDPR. This is because 'special category' data is particularly sensitive.

We may process special category data for the following reasons:

- To safeguard pupils' welfare, provide appropriate pastoral support and, where necessary, medical care, and take appropriate action in the event of an emergency, incident, or accident. This may include disclosing details of a pupil's medical condition or other relevant information where it is in the pupil's best interests to do so. Examples include sharing information for the purposes of obtaining medical advice, ensuring social protection and safeguarding, cooperating with the police or social services, arranging insurance, or informing caterers and school trip organisers of any dietary requirements 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;
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are Additional Educational Needs, 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.

What personal information do we collect about school pupils?

The personal data we process takes different forms – it may be factual information, expressions of opinion, images or other recorded information etc.

Examples include:

- **Personal and identification data:** name, date of birth, gender, unique pupil number, photographs, and identity documents.
- **Contact and family details:** addresses, telephone numbers, email addresses, parents'/guardians' details, emergency contacts, and family relationships.
- **Admissions and school history:** previous schools, enrolment information, and registration records.
- **Education and attainment:** assessment data, progress reports/records, attendance data, personal educational plans, and any other information relating to their learning and development.
- **Behaviour and pastoral records:** behaviour logs, disciplinary records, rewards, and pastoral support information.
- **Safeguarding information:** child protection and welfare records, where applicable.
- **Activity and participation data:** involvement in school trips, clubs, extracurricular activities, and events.
- **Digital and systems data:** use of school IT systems, online learning platforms, and associated activity logs.
- **Financial and support information:** bursary eligibility and other relevant support arrangements.
- **Consent records:** permissions relating to trips, media use, and other school activities.
- **Communications and correspondence:** records of contact between the school and parents or guardians.
- **Administrative and statutory records:** information required for legal reporting, inspections, and government returns.
- **Photos and videos:** photos and videos taken by the School for promotional or marketing purposes in accordance with applicable policies.
- **Access control and security data:** images captured by CCTV and activity logs generated from the school's access control system.

What sensitive personal data do we collect and process about school pupils?

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- **Health data:** medical conditions, allergies, immunisations, medication requirements, information about health and safety incidents, and other relevant health data.
- **Special educational needs and disabilities information:** support plans, assessments, and related documentation.
- **Information about racial or ethnic origin:** nationality, ethnicity, passport/VISA status and other related information.
- **Religious and Philosophical beliefs**
- **Biometric data:** for the use of the optional automated biometric recognition access control system in accordance with the School's Biometric Policy.

How do we collect personal information about parents and pupils?

We mainly collect personal data directly from pupils, parents, guardians, or carers. This may be via forms, emails, letters, documents or other communications. Personal data may also be generated throughout the ordinary course of interaction or communication.

In some cases, personal data will be supplied by third parties. We may collect information from the following sources:

- Previous schools and educational institutions.
- Local authorities.
- Examination boards and awarding bodies.
- Healthcare providers and school nursing services.
- Social care services.
- Specialist support services.
- Government departments and public bodies.
- Alternative provision providers and specialist education settings.
- Law enforcement agencies.
- Courts and tribunals.
- Regulatory and inspection bodies.

What information do we collect about parents, guardians, and carers?

We may collect or use the following personal information to manage our relationship with parents, guardians, and carers.

- Names
- Email addresses
- Mobile and telephone numbers
- Home addresses
- Bank details and other financial information
- Car registration (if using onsite parking)
- Correspondence with parents
- Images captured by CCTV
- Photos and videos captured with consent at events and school activities.

CCTV

We operate overt closed-circuit television (CCTV) systems. This may be used to detect and prevent crime as well as to enable compliance with Abbey policies. The cameras are installed in a number of locations in the Abbey and surrounding precincts. This system is in operation 24/7 all year round and is managed by our Security team.

Clear and prominent signage is displayed to show that we have CCTV cameras and to identify us as the data controller.

Footage captured by our CCTV system is retained for 30 days before it is automatically overwritten, except where retention is lawfully required for investigative or evidentiary purposes. Further information about how we operate our CCTV system can be found in the Abbey's internal CCTV Policy (which can be made available on request).

Do we need your consent or your child's consent to process personal data?

Most of the personal information collected and processed by us is necessary for the fulfilment of our legal and contractual obligations. We do not need your consent to process the majority of the personal data we hold about you. Without this personal information, we may be unable to fulfil the terms of our contract with you or meet our own legal and regulatory obligations.

In some instances, you can refuse to provide personal data to us. For example, if we are relying on the lawful basis of consent, we will not collect and process your personal data unless you have explicitly consented. We will always make it clear when personal data is optional to provide.

Where we rely on the lawful basis of consent, we may, given the nature of the processing and your child's age and understanding, seek the pupil's consent. This may be appropriate if they have sufficient understanding and intelligence to understand what they would be consenting to.

In general, we 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 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, we may be under an obligation to maintain confidentiality unless, in our opinion, there is a good reason to do otherwise; for example where we believe 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 Behaviour, Discipline & Exclusions policy, and IT Policy and school rules. Staff are under professional duties to do the same covered under the relevant staff policies.

How do we protect your personal data and your child's personal data?

Our staff know how to handle personal data properly and are all subject to a duty of confidentiality. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training. We make sure that your information is only shared on a need-to-know basis. Your personal data will be stored on secure management systems, IT systems, and admin filing systems. We may hold both physical and electronic records for each pupil.

We have appropriate technical and organisational safeguards in place to protect the security of personal data we hold. This includes policies around use of technology and devices, and access to school systems. We regularly test our systems to make sure they are secure. We

also have policies and procedures in place to deal with any suspected or actual personal data breaches.

With whom do we share your personal data?

For the most part, personal data collected by us will remain within the School and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). It may be shared internally with teachers, support staff, and system administrators on a need-to-know basis. In some circumstances, it may be disclosable to legal advisors or third parties who are acting on our behalf.

Particularly strict access rules apply to medical records, which are held and accessed only by the school matron and appropriate staff, or otherwise in accordance with express consent or as required for pastoral or safeguarding purposes.

However, a certain amount of any relevant information in relation to a child with Additional Educational Needs (AEN) will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

We use a number of third-party service providers to assist in the provision of our services and to facilitate our day-to-day operations. We only share personal data with these third parties when necessary and lawful. Before disclosing personal data to a third party or engaging a processor, we contractually require the third party to appropriate technical and organisation safeguards in place to protect that personal data and to comply with data protection law.

We may share your personal data with the following third parties:

- Appropriate contractors
- Professional advisers (e.g. lawyers, insurers, PR advisers and accountants)
- Examination boards
- Travel agencies or tour operators in the case of school trips
- Government authorities (e.g. HMRC, DfE, police or the local authority)
- Appropriate regulatory bodies. These may include but are not limited to the Independent Schools Inspectorate, the Charity Commission or the Information Commissioner);
- The School's catering provider
- The Westminster Abbey Old Choristers' Association but only after seeking specific permission from parents.
- Any other processors used by the School for the performance of its operations.

We will seek express permission from staff, parents and pupils where data will be collected by a third party in order to facilitate school events.

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 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 school's Safeguarding Policy.

Do we transfer your personal data outside the UK?

Most of the personal data collected and processed by us is processed onsite. Certain personal data processed by third parties on our behalf may be transferred outside of the UK.

Our processors are contractually obliged to implement appropriate safeguards if they engage in cross-border transfers to protect the security and integrity of your personal information.

How long do we retain your personal data?

We will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Pupil files will typically be retained for 7 years after the year in which the pupil reaches the age of 18. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements. To determine the retention period for personal data, we consider the purposes for which it was collected, the nature of the personal data, and the applicable legal requirements. Upon the expiry of the applicable retention period, we securely destroy the personal data.

For more information on how long we store your personal information or the criteria we use to determine this, please contact the Abbey's Data Protection Officer at dataprotection@westminster-abbey.org.

Keeping in touch and supporting the school

Upon leaving the school, leavers and parents will be asked if they consent to be contacted by the school in the future. This may include sending updates on the activities of the school, advertising alumni events or other events of interest, or promoting and raising funds for the school and, where appropriate, other worthy causes. With the consent of parents or former pupils themselves, personal data may also be shared with the Westminster Abbey Old Choristers' Association for the purpose of establishing and maintaining relationships with the school and the wider Abbey community.

Should you wish to limit or object to any such use, or would like further information about it, please contact the Data Protection Officer in writing (dataprotection@westminster-abbey.org). You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the school 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).

What are your rights as a data subject?

Subject Access Right

You have the right to ask us for copies of your personal information or your child's personal information. You also have the right to request other information such as details about where we get personal information from and with whom we share your or your child's personal information.

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. A pupil of any age may ask a parent or other representative to make a subject access request on their behalf.

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 data. We expect that most parents will act on their child's behalf

to submit Subject Access Requests. For older pupils, the parent making the request may need to evidence their child's authority for the specific request.

There are some exceptions which mean we may not be able to provide all the information that you have requested.

The School is not required to disclose pupil examination scripts or provide examination or other tests marks ahead of any ordinary publication.

If you submit a subject access request (SAR), you will receive a response within 30 days of submitting your request, unless an exemption applies. We may also ask you to clarify the scope of your request if it is unclear. We reserve the right to charge a reasonable fee to cover the administrative costs of complying with a SAR that is repetitive or manifestly unfounded or excessive.

It should be noted that not all information requests are subject access requests. Parents will receive education and pastoral updates on a regular basis in accordance with the Parent Contract. Parents do not need to submit a Subject Access Request in order to access information about their child which they usually receive or would expect to receive during their time at the School. All information requests from, on behalf of, or concerning pupils – whether made under subject access or simply as an incidental request – will be considered on a case-by-case basis.

Your other rights:

You and your child have a number of other rights to the personal information held on you or your child.

- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. The school will endeavour to ensure that all personal data held in relation to an individual are as up to date and accurate as possible. Individuals must please notify the school of any significant changes to important information held about them.
- **Your right to erasure (or the right to be forgotten)** - You have the right to ask us to delete your personal information in some circumstances. The School will sometimes have compelling reasons to refuse specific requests to delete personal data depending on the lawful basis of its processing. All such requests will be considered on their own merits.
- **Your right to the restriction of processing** - You have the right to ask us to limit how we can use your personal information in some circumstances.
- **Your right to object to processing** - You have the right to object to the processing of your personal data in some circumstances.
- **Your right to data portability** - You have the right to ask us to transfer the personal information you gave us to another organisation, or to you.
- **Your right to withdraw consent** – When we use consent as our lawful basis, you have the right to withdraw your consent at any time.
- **Your right to request a person to review any decisions made by automated means** - We confirm that you have the right to request that a human reviews any decisions made solely by automated means.

- **Your right to complain** – If you are unhappy with how we use your personal information, you can make a complaint to us. More information is in the section 'How to complain'.

Please note that the above rights are not absolute, and we may be entitled to refuse to facilitate the exercise of their rights where exceptions apply. We will endeavour to respond to any requests as soon as is reasonably practicable and in any event within statutory time-limits (which is generally one month, but fulfilling more complex or multiple requests, e.g. those involving third party information, may take 1-2 months longer).

You can also contact the Abbey's Data Protection Officer at dataprotection@westminster-abbey.org to find out more about how your rights apply. You can also visit the website of [Information Commissioner's Office](#) for more detailed information on each right.

Any individual wishing to exercise any of these rights should put their request in writing to the Abbey's DPO dataprotection@westminster-abbey.org. We might ask you to verify your identity if you make a request. This is a security measure taken to prevent the unlawful and unauthorised disclosure of personal data.

How to complain

If you have any concerns about our use of your personal data or how we have responded to a request you have made, you should reach out to us directly at dataprotection@westminster-abbey.org. We will handle your complaint in accordance with our internal data protection complaint policy. If you are not satisfied with the response you have received following an internal review, you have the right to lodge a complaint with the [Information Commissioner's Office](#) (ICO).

You can contact them by visiting their website [Make a complaint about how an organisation has used your personal information | ICO](#) or by calling their helpline 0303 123 1113.

You can also write to them:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF