



DR CHALLONER'S GRAMMAR SCHOOL

PRIVACY NOTICE

Policy Approved: Summer 2026
Update Cycle: 2 Years
Update Due: Summer 2028

1.0 Introduction

This notice sets out how and why Dr Challoner's Grammar School Academy Trust ("the School" or "DCGS" or "Astra") collects and uses any personal information, and how that information is processed. This should be read alongside the school's "Data Protection and Freedom of Information Policy".

Under UK data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing this 'privacy notice' (sometimes called a 'fair processing notice') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals as part of the school's business. The Academy Trust is the 'data controller' for the purposes of data protection law.

1.1 Personal information

This notice covers personal information. That is information which identifies an individual (and includes information which would identify an individual to the person to whom information is disclosed because of special knowledge they have or could obtain). This includes (but is not limited to) contact details, assessment/examination results, attendance information, and some special category data, eg. characteristics such as ethnic group, special educational needs, any relevant medical information, photographs and videos.

1.2 Individuals

This notice is divided into two further sections. Section 2 contains information about how we handle all data generally and is relevant to all individuals. Section 3 contains specific privacy notice sections to help individuals identify how this notice applies to them, depending on where they are in their journey through school life as outlined below:

- **Staff:** Those employed by the school
- **Job Applicants:** Those seeking employment at the school
- **Volunteers:** Those who volunteer for whom we must hold data
- **Students:** Any student enrolled at DCGS in years 7-13
- **Alumni:** Any former student of DCGS
- **Parents/Carers:** The parent, carer or guardian of a student
- **Donors:** Any of the above that donate to DCGS directly or indirectly
- **Astra Associates:** Anyone engaging with the services of the Astra Teaching School Hub including but not limited to those applying to be enrolled or who are accepted onto a teacher training course;
- **Visitors:** Anyone visiting the school site
- **Contractors:** Self employed contractors providing a service to the school
- **Governors/Academy Trust Members:** Members of the Governing Body or Academy Trust of DCGS
- **Prospective Students and their Parents:** Those who seek entry to the school for their son/daughter

For some users, they may only fit into one category. For others it is possible that all categories may be relevant, or that several categories may be relevant at the same time.

For example:

"An individual attended the school as a **Student**. They then left the school to go to university (**Alumni**) and started a family. They decided to set up a long term voluntary donation (**Donor**) to the school at this time. Once back from university they visited the school as a **Visitor** and decided to **Volunteer** at the school for a year. They liked the vibe in the school so much they determined to train as a teacher (**Astra Associate**) with DCGS and subsequently applied for a job (**Job Applicant**) and became employed as a teacher (**Staff**). Their eldest son soon attended the school as a pupil and they now needed to provide data to the school in their role as a **Parent**."

For this individual, the data supplied to DCGS during their history with the school will have been processed for separate purposes. This privacy notice allows them to identify how the data supplied for each purpose will be treated. By clicking on the links above this will take you to the relevant section within this document. Parents may wish to refer to the Student notice to understand how we process their child's data.

1.3 Notice Review

This policy will be reviewed the earlier of every two years or when major national, organisational, legislative or technological changes occur.

1.4 Links to other websites

This privacy notice does not cover the links from the DCGS website or any information which DCGS may direct you to. We encourage you to read the privacy notices on any other websites you visit.

2.0 General Privacy Principles

2.1 Emails

Data processing is conducted under the lawful basis of legitimate interests for the purposes of institutional communication. The school utilises traditional and bulk email providers which may track whether messages or links have been accessed. This enables the monitoring of engagement with school news and ensures that urgent or statutory communications have been successfully received by the intended recipients.

2.2 Cookies

Sections of the School's website use essential cookies to deliver services. For other parts of the website Google may also analyse traffic. Where this is the case, a Google pop up may appear upon first access. Where a login is required to access certain information, functional cookies will be associated with the cookies with the corresponding permitted accounts.

2.3 How we hold personal information

Where we hold personal information the School is committed to:

- Keeping information safe and secure, whether that is an electronic or physical record.
- Keeping information up to date.
- Using personal information fairly at all times.
- Keeping data for no longer than it is needed; the school adheres to a retention schedule to ensure that this is the case.

Individuals can correct any information we hold that is incorrect (such as updating addresses) by calling the school reception who will direct them to the relevant department to process the change.

2.4 Data Security

DCGS takes the security of your data seriously. We have internal controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, or subject to unauthorised access. Where necessary, we implement appropriate network access controls, user permissions and encryption to protect data.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

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.

Where we share data with an organisation, whether in the UK, or outside we will protect your data by following all applicable UK data protection laws.

2.5 International Data transfer

While the School primarily processes data within the UK, specific activities—most notably international school trips or the use of specialist educational platforms—may necessitate the transfer of data outside the UK. In such instances, the School utilises the UK International Data Transfer Agreement (IDTA) or other appropriate safeguards approved under UK law to ensure the continued protection of personal information equivalent to as if it had remained in the UK.

2.6 Use of Generative AI

The School may authorise staff and students to use specific generative AI tools to support business functions. All approved platforms are subject to Data Protection Impact Assessments (DPIAs) where appropriate. Approved platforms do not use personal data to train public AI models. All AI-assisted processing remains compliant with the principles of data minimisation and security.

2.7 Key Personnel

The Headteacher of the Academy has overall responsibility for the processing of data within the Academy Trust. To support them in meeting these responsibilities the following roles

A member of the Senior Leadership Team is designated the school's data protection lead (dpo@challoners.org). The current data protection lead is Sean Kennedy, Chief Financial and Strategy Officer. Most data related queries should be directed here in the first instance.

The school has an external Data Protection Officer ("DPO") who provides up to date advice and guidance to the Academy and the data protection lead in fulfilling their responsibilities. The DPO is Nicola Cook - Schools DPO - nicola@schoolsdpo.com

2.8 Your Rights

2.8.1 How to access personal information we hold about you

You can find out if we hold any personal information about you, and how we use it, by making a '**subject access request**'. Please note that in a minority of situations certain classes of data may not be disclosed during a subject access request (for example if it would lead to safeguarding issues).

If we do hold information about you, we will:

- Give you a description of it
- Tell you the rights you have in connection with accessing your data
- Tell you why we are holding and using it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)
- Give you a copy of the information

You may also ask us to send your personal information to another organisation electronically in certain circumstances. If you want to make a request please contact our data lead on dpo@challoners.org. Please note that we will ask for proof of identity before processing any such request.

2.8.2 Your other rights over your data

You have other rights over how your personal data is used and kept safe, including the right to:

- Say that you don't want it to be used if this would cause, or is causing, harm or distress
- Stop it being used to send you marketing materials
- Say that you don't want it used to make automated decisions (decisions made by a computer or machine, rather than by a person)
- Have it corrected, deleted or destroyed if it is wrong, or restrict our use of it

- Claim compensation if the data protection rules are broken and this harms you in some way

2.9 Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance by contacting our Data Protection Lead on dpo@challoners.org.

If you are dissatisfied with our handling of a request a copy of our Data Protection Complaints procedure will be made available for you to raise an internal complaint. If you are still not satisfied with the resolution of your complaint, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF

3.0 Privacy Notices

3.1 Staff

3.1.1 Summary

DCGS collects and processes personal information about staff before, during and after your period of employment with us. We are committed to being transparent about how we collect and use your data.

3.1.2 The personal data we hold

We process data relating to those we employ, or otherwise engage, to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Qualifications and employment records, including (but not limited to) work history, job titles, working hours, training records, teacher number and professional memberships
- Performance information, such as training records and Professional Development Reviews
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence / passport
- Photographs
- Data about your use of the school's information and communications system

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions

- Trade union membership
- Health, including any medical conditions, and sickness records
- Photographs and CCTV images captured in school

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences. We may also hold data about you that we have received from other organisations, including other schools and social services and the Disclosure and Barring Service in respect of criminal offence data.

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

3.1.3 *Why we use this data*

The purpose of processing this data is to help us run the school, including to:

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards students
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body
- Meet Health and Safety Legislation, including Fire in the Workplace.

3.1.4 *Our lawful basis for using this data*

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

Where we are required to have your consent and you have provided us with this consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so. Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

3.1.5 *How we store, access and protect your data*

We create and maintain employment files for each staff member. The information contained in these files are kept secure with appropriate security measures in place. It is only used for purposes directly relevant to your employment and accessed by those staff authorised to do so. 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.

Once your employment with us has ended, we will retain these files and delete the information in it in accordance with our record retention schedule.

In addition, Fire Register data is recorded via our signing-in/out system.

3.1.6 Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with UK data protection law) we may share personal information about you with:

- *The Department for Education - for performance management purposes*
- *Our local authority (Buckinghamshire) to meet our legal obligations to share certain information with it, such as safeguarding concerns*
- *Your family or representatives – should we need to contact them in an emergency*
- *Our regulator Ofsted – for inspection and monitoring purposes*
- *Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll and our Employee Assistance Programme provider*
- *Other bodies such as HMRC, Teachers Pensions or the Local Government Pension Scheme*
- *Our auditors – to enable them to provide the service we have contracted them for*
- *Survey and research organisations – to enable them to provide the service we have contracted them for*
- *Professional advisers and consultants – to enable them to provide the service we have contracted them for*
- *Charities and voluntary organisations – to support the education of students at Dr Challoner's Grammar School*
- *Police forces, courts, tribunals – when we are legally obliged to do so.*
- *Professional bodies – to support professional development activities*

We may also share your data with organisations running trips and visits where you are accompanying students.

3.1.7 How Government uses your data

We are required to share information about our school employees with the DfE under Section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations (2007) and subsequent amendments. The workforce data that we lawfully share with the DfE through data collections:

- informs departmental policy on pay and the monitoring of the effectiveness and diversity of the school workforce
- links to school funding and expenditure
- supports 'longer term' research and monitoring of educational policy

Data collection requirements

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to:

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>

Sharing by the Department

The Department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested
- the arrangements in place to securely store and handle the data

To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

To contact the department: <https://www.gov.uk/contact-dfe>

3.2 Job Applicants

3.2.1 Summary

DCGS collects and processes personal information about Job Applicants when they apply for a position at the School. We are committed to being transparent about how we collect and use your data.

3.2.2 The personal data we hold

We process data relating to those applying to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you could include, but is not restricted to:

- Contact details
- Copies of right to work documentation
- References
- Evidence of qualifications
- Employment records, including work history, job titles, training records and professional memberships
- Information gathered from business and social media sources in the public domain, eg LinkedIn, Facebook

We may also collect, store and use information about you that falls into “special categories” of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Disability and access requirements
- Photographs and CCTV images captured in school

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences. We may also hold data about you that we have received from other organisations, including schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

3.2.3 Why we use this data

The purpose of processing this data is to aid the recruitment process by:

- Enabling us to establish relevant experience and qualifications
- Facilitating safe recruitment, as part of our safeguarding obligations towards students
- Enabling equalities monitoring
- Ensuring that appropriate access arrangements can be provided for candidates that require them

3.2.4 Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)
- We have legitimate interests in processing the data

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

3.2.5 How we store, access and protect your data

We create files for each prospective staff member. The information contained in these files is kept secure with appropriate security measures in place. It is only used for purposes directly relevant to your potential employment and accessed by those staff authorised to do so.

For unsuccessful candidates, when personal data we collect as part of the job application process is no longer required we will delete your information in accordance with our Records Retention Schedule.

3.2.6 Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with UK data protection law), we may share personal information about you with:

- *Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns*
- *Suppliers and service providers – to enable them to provide the service we have contracted them for, such as HR and recruitment support*
- *Professional advisers and consultants – to enable them to provide the service we have contracted them for*
- *Police forces, courts, tribunals – when we are legally obliged to do so*
- *Employment and recruitment agencies*

3.3 Volunteers

3.3.1 Summary

DCGS collects and processes personal information about volunteers during and after your relationship with us to manage that relationship. We are committed to being transparent about how we collect and use your data.

3.3.2 The personal data we hold

We process data relating to those we employ, or otherwise engage, to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you could include, but is not restricted to:

- Contact details
- Curriculum Vitae or other profiles
- Next of kin and emergency contact numbers
- Information gathered from business and social media sources in the public domain, eg LinkedIn, Facebook
- References, and where relevant DBS checks
- Information on special requirements, health or medical conditions
- Information relating to project monitoring, such as the number of hours spent on a project
- Information related to availability or periods of unavailability
- CCTV images if you are present on the DCGS site

3.3.3 Why we use this data

The purpose of processing this data is to help us run the school, including to:

- Facilitate safe recruitment of volunteers, as part of our safeguarding obligations towards students
- Enable ethnicity and disability monitoring
- Support the work of staff and students at Dr Challoner's Grammar School

3.3.4 Our lawful basis for using this data

There are a range of lawful reasons for holding your personal data, which include: legal obligation; public interest; and contractual basis.

3.3.5 How we store, access and protect your data

We create files for each volunteer. The information contained in these files is kept secure with appropriate security measures in place. It is only used for purposes directly relevant to your role as a volunteer and accessed by those staff authorised to do so.

DCGS considers its relationship with volunteers to be long-term. This means that we will maintain a record for you until such time as you tell us that you no longer wish us to keep in touch and for six years after you conclude your volunteering with us in line with our records retention guidelines. We will then delete the majority of your personal data, but will maintain basic personal data to ensure that we do not inadvertently create a new record in the future.

3.3.6 Data Sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about you with:

- *Suppliers and service providers – to enable them to provide the service we have contracted them for*
- *Professional advisers and consultants – to enable them to provide the service we have contracted them for*
- *Police forces, courts, tribunals – when we are legally obliged to do so*

3.4 Students

3.4.1 Summary

DCGS collects and processes personal information about students whilst they study at the school or require our support with University applications or examination results. This is to support students academically and safeguard them. We are committed to telling you about how we collect and use your data.

3.4.2 The personal data we hold

We hold some personal information about you to make sure we can help you learn and look after you at school. While in most cases you, or your parents/carers, must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data.

We will always tell you if it's optional. If you must provide the data, we will explain what might happen if you don't.

In order to help you, we may also get information about you from some other places too – like other schools, the local council and the government.

This information may include, but is not restricted to:

- Your contact details
- Your test results
- Your attendance records
- Your characteristics, like your ethnic background or any special educational needs
- Any medical conditions or allergies you have
- Details of any behaviour issues or exclusions
- Photographs or video recordings
- CCTV images
- Data about your use of the school's information and communications system
- Safeguarding information (such as Court Orders or Professional Involvement from others)
- Any information about any Special Educational Needs you may have

3.4.3 Why we use this data

We use this data to help run the school, including to:

- Get in touch with you and your parents/carers when we need to
- Check how you're doing in exams and work out whether you or your teachers need any extra help

- Track how well the school as a whole is performing
- Look after your wellbeing
- Make personal data, including sensitive personal data, available to staff for planning curricular or co-curricular activities
- Where relevant, to keep your previous school informed of your academic progress and achievements.
- To meet the statutory duties we have to provide information to the Department for Education
- To enable you to access Higher Education and training, both inside and outside of the UK when you ask us to do so
- To provide references to prospective employers, both inside and outside of the UK when you ask us to do so

3.4.4 Our lawful basis for using this data

We will only collect and use your information when the law allows us to. Most often, we will use your information where:

- We need to comply with the law
- We need to use it to carry out a task in the public interest (most obviously, in order to provide you with an education)

Sometimes, we may also use your personal information where:

- You, or your parents/carers have given us permission to use it in a certain way
- We need to protect your interests (or someone else's interest)

Where we have permission to use your data, you or your parents/carers may withdraw this at any time. We will make this clear when we ask for permission, and explain how to go about withdrawing permission.

Some of the reasons listed above for collecting and using your information overlap, and there may be several grounds which mean we can use your data.

3.4.5 How we store, access and protect your data

We will create files within our systems for every student at the school. The information contained in this file is kept secure with appropriate security measures in place.

We will keep personal information about you while you are a pupil at our school. We will also keep it after you have left the school, where we are required to by law.

We have a record retention schedule which sets out how long we must keep information about pupils. Currently core student records are kept until the end of the academic year in which you turn 25.

3.4.6 Data sharing

We do not share personal information about you with anyone outside the school without permission from you or your parents/carers, unless the law and our policies allow us to do so.

Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you with:

- *Our local authority – to meet our legal duties to share certain information with it, such as concerns about pupils' safety and exclusions*
- *Your family and representatives - where it is in their legitimate interest*
- *Educators and examining bodies – so that they can provide the services with have contracted them for*

- *Our regulator OFSTED that supervises us – to monitor the schools' performance*
- *Suppliers and service providers – so that they can provide the services we have contracted them for*
- *Health authorities – where we have a statutory obligation to do so*
- *Health and social welfare organisations - where we have a statutory obligation to do so*
- *Police forces, courts, tribunals – where we have a statutory obligation to do so*
- *Schools that you may attend if you leave DCGS before you reach the end of Year 13*
- *The Department for Education (please see below)*

3.4.7 Department for Education - National Pupil Database

We are required to provide information about you to the Department for Education (a government department) as part of data collections such as the school census.

Some of this information is then stored in the [National Pupil Database](#), which is managed by the Department for Education and provides evidence on how schools are performing. This, in turn, supports research.

The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, examination boards and others.

The Department for Education may share information from the database with other organisations which promote children's education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data.

You can find more information about this on the Department for Education's webpage on [how it collects and shares research data](#).

You can also [contact the Department for Education](#) if you have any questions about the database.

3.4.8 Youth support services

Once you reach the age of 13, we are required to pass limited information (name, date of birth and address) to our local authority and/or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- youth support services
- careers advisers
- post-16 education and training providers

Unless a parent opts out, we may also be required to share additional information including email address and telephone numbers. This right is transferred to you once you reach the age 16.

For more information about services for young people, please visit the Buckinghamshire Council Website.

3.5 Alumni

3.5.1 Summary

Dr Challoner's Grammar School (DCGS) supports a global community of alumni. In order to inform and engage alumni in a bespoke manner, the school processes personal data. This helps to ensure alumni get the best information and contact available and also helps us, where appropriate, to ask for your support with the things we believe you care about.

Prior to you leaving the school as a pupil we will write to you to ask whether you wish to be contacted by the school in the future as an alum/alumna. Data regarding alumni (including whether they wish to be contacted by the school in the future) is held on specific alumni databases.

This privacy notice relates to these records. It does not apply to records created whilst a student is on roll at DCGS. The privacy notice relating to data held by the school in relation to students is found in section 3.4.

As an alum, you may wish to make a donation to the school in the future. Where this is the case you will also be classified as a donor. There is a separate donor privacy notice (section 3.7) that provides information regarding how this specific data is held.

3.5.2 The personal data we hold

As a former student of DCGS, some of the personal data that we hold about you is transferred from your paper or electronic student record to the school's alumni database. This personal data will have been collected from your initial registration and time at school and may include:

- Your name, title, gender, and date of birth
- Your school photograph
- Your home or parental address, email address and telephone numbers
- Your familial relationships (parents, grandparents and siblings)
- Subjects studied, school House and achievements (sports, music, etc.)
- Start and end dates and destination upon leaving
- Contact details updates, occupation, event registration and careers volunteer activity
- Whether you have consented to be contacted as an alum by telephone, email or post to enable us to comply with The Privacy and Electronic Communications (EC Directive) Regulations 2003 and subsequent legislation. Please note that for alumni, we use our legitimate interests as the legal basis to process your data and contact you by mail if we do not have consent to contact you electronically.

We may hold personal data relating to your professional history. This data may have been provided by you, or it may have been obtained from social media (e.g. LinkedIn, Facebook) or publicly available sources. It may include:

- Your employment status (e.g. part-time, full-time, retired)
- Your current job title and work email address
- Your current and past employers, name, address and telephone number
- The dates that you have been employed in any particular role
- Your previous role(s) and job title
- Your photograph

3.5.3 Why we use this data

We use this information to:

- Send school and alumni news, including the *Challoner's Reconnected* newsletter
- Publicise events
- Recruit alumni volunteers and mentors
- Make fundraising appeals by email, direct mail, telephone and face-to-face meetings and ensure that we only send you communications about events or fundraising appeals that would be of interest to you
- To enable you to access Higher Education and training, both inside and outside of the UK when you ask us to do so.
- To provide references to prospective employers, both inside and outside of the UK when you ask us to do so

3.5.4 Our lawful basis for using this data

We will process the personal information you provide for our legitimate interests and to enhance the experience of both our alumni and potentially our current students. This includes contacting you about relevant news and events.

3.5.5 How we store, access and protect your data

Personal data of alumni is stored in one of the school's third-party databases. Access to personal data is restricted to those members of staff who have a requirement to maintain a relationship with you, and is controlled through password protection and user security profiles. All school employees, contractors and volunteers who are given access to personal data receive mandatory Data Protection training and have a contractual responsibility to maintain confidentiality.

If you have opted to receive communication via email, a record of your email address is held by our bulk email provider.

DCGS considers its relationship with alumni to be life-long. This means that we will maintain a record for you until such time as you tell us that you no longer wish us to keep in touch. In this instance we will delete the majority of your personal data, but will maintain basic personal data to ensure that we do not inadvertently create a new record in the future.

3.5.6 Data Sharing

We do not disclose personal data to third parties or Government agencies unless the law requires us to do so or exigent circumstances require us to protect the safety of our users or the public.

3.6 Parents / Carers

3.6.1 Summary

Dr Challoner's Grammar School (DCGS) aims to support students attending the school. In order to do this, we will hold personal data on parents and carers to support their child's learning and well-being. We will also seek support from parents and carers to further the activities of the school. Such support may be in-kind (eg help with Career's Education or School Events) or financial.

In order to communicate with parents effectively by email, email addresses will be uploaded onto our bulk email provider. In order to communicate with parents effectively by post or telephone, names, telephone numbers and postal addresses will be uploaded onto school databases.

3.6.2 The personal data we hold

As a parent of a student at DCGS we hold items of personal data about you. This personal data will have been collected from you when you enrolled your child at DCGS. It will include:

- Your name and title
- Your home address, email address and telephone numbers
- Information about your current employment if you have chosen to tell us
- Information indicating if you or your company would be willing to support the school with Career's Education or through advertising at events or in the School Magazine if you have chosen to tell us
- Information enabling us to gain a Disclosure and Barring Service (DBS) check if you are hosting a student from a partner school
- Information about your child/children (please see student and alumni privacy policies)

We also record information on payments made for services provided to benefit students at DCGS. This may include payment for music lessons, concert or play tickets or for non-curricular school trips. We will also hold information on voluntary contributions made for school trips, visits and extra-curricular activities. Where you make a donation to Dr Challoner's School Educational Trust (reg charity no. 298550) the data you provide to enable us to collect this donation will be subject to our donor privacy policy (Section 3.7).

3.6.3 Why we use this data

Personal data is used to:

- Update parents on school news and events which may be of interest to them or their child
- Send progress reports of achievement regarding your child
- Recruit parent volunteers
- Make fundraising appeals by email, direct mail, telephone and face-to-face meetings and ensure that we only send you communications about events or fundraising appeals that would be of interest to you.

3.6.4 Our lawful basis for using this data

There are a range of lawful reasons for holding your personal data, which include: legal obligation; public interest; and contractual basis.

Where we seek support of any kind from parents, we use legitimate interest as the legal basis for these communications.

3.6.5 How we store, access and protect your data

Personal data of parents is stored on school databases. Access to personal data is restricted to those members of staff who have a requirement to maintain a relationship with you, and is controlled through password protection and user security profiles. All school employees, contractors and volunteers who are given access to personal data receive mandatory Data Protection training and have a contractual responsibility to maintain confidentiality.

DCGS considers its relationship with parents to last for at least as long as they have a child attending DCGS. This means that we will maintain a record for you until such time as your child leaves the school, unless you tell us otherwise. Please note that we are required to keep some financial data for longer periods than this.

3.6.6 Who we share personal data with

We will share your data with our catering company, to enable your child to make use of the cashless catering facilities at the school.

We will also share your data with companies we work with to provide services to benefit students at DCGS. An example would be a company who we engage to organise a school trip or a company who we engage to take student or whole school photographs.

We may also share your data with organisations running trips and visits.

We do not disclose personal data to third parties or Government agencies unless the law requires us to do so or exigent circumstances require us to protect the safety of our users or the public.

3.7 Donors

3.7.1 Summary - The School and the Educational Trust

This privacy notice explains how we use your data, how you can control the way in which we use that data and what actions you can take if you would like to change the way in which your data is being used. Donations to Dr Challoner's Grammar School are received to benefit students at Dr Challoner's Grammar School. These donations are processed by Dr Challoner's School Educational Trust (DCSET), a registered charity (298550). To manage its records, a database is utilised.

3.7.2 How we gather information

Data is collected and updated from information provided by donors when making a donation.

In some cases, we may supplement the information you have given us with data from elsewhere. Examples could include conducting appropriate due diligence to safeguard the reputation of Dr Challoner's Grammar School in the case of significant financial transactions. Sources of data could include information gathered from a news article, online media, or publically available directories or Companies House. The data we collect in relation to donors may include:

- Your bank account number/card number, name and sort code (used for processing Direct Debits/ Standing Order Mandates and credit/debit cards)
- Gift amount, purpose, date and method of payment including cheque numbers or payment references
- Tax status and Gift Aid Declaration information
- Your spouse/partner's name
- Your contact details
- Record of verbal or email conversations/meetings including any personal interests which relate to financial gifts made to the school

3.7.3 What we do with your data and our responsibilities

The law requires us to tell you the lawful basis upon which we process your data.

The personal details held about you will only be used to process your donation and update you on projects you have donated to or expressed an interest in. Your data will be shared with Dr Challoner's School Educational Trust (Registered Charity No 298550) to enable us to process donations in line with our financial regulations.

Many activities are carried out to fulfil an agreement, e.g. the processing of a donation. DCSET will not share your data with third parties except where there is a legal obligation to do so, e.g. if you Gift Aid a donation,

then we are required to tell HMRC the name and address of the donor and the date and amount of the donation. Our auditors will also inspect our records to ensure that donations are processed in line with the wishes of a donor.

In all other cases, the law allows us to process your data if it is in our legitimate interests to do so, provided such processing is not overridden by your interests or your fundamental rights and freedoms. Practically speaking, this means that we carry out an exercise to check that we will not cause you harm by processing your data, that the processing is not overly intrusive and that we will only do so in a way which is described in the Privacy Notice.

3.7.4 Protecting your data

Your data is kept securely with appropriate security measures in place.

3.7.5 How long do we keep your data

We will keep your data for as long as is needed to complete the task for which it was collected. Relationships between donors and a school are often long term ones, and so we expect to keep your data for as long as that relationship exists. Please note that we are legally obliged to keep certain types of data (eg.finance and gift aid) for specified periods of time.

3.7.6 Data Sharing

Your data will not be shared with any other third party (except DCSET) unless there is a statutory reason for us to do so.

3.8 Astra Associates

3.8.1 Summary

This privacy notice explains how we use your data when you apply to use Astra services including but not limited to training to teach with Astra.

Once any application has been successful the terms and conditions of any engagement will include the data processing involved will be shared with the Astra Associate for agreement before commencing with the services. For practical purposes these documents are kept separate and the most up to date information is available from hello@astra-alliance.com.

For Trainees this privacy notice focuses primarily on the data that you may provide us with prior to you formally accepting a place on the course and how this is dealt with. In the event that you are provided with a conditional offer of a place on the course and then accept a place on a course you will at that time be required to sign separate terms and conditions applicable to trainees that enrol on the course. These conditions contain additional details of what data is required from Astra trainees accepting an offer, together with how this will be used.

For those using other Astra services, this privacy notice focuses on the data you may provide us with as a part of the application process.

3.8.2 The personal data we hold

We process data relating to those applying to train with Astra. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Copies of right to work documentation
- References
- Evidence of qualifications
- Employment records, including work history, job titles, training records and professional memberships
- CCTV images when you visit Dr Challoner's Grammar School

We may also collect, store and use information about you that falls into “special categories” of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Disability and access requirements

While the majority of the information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

3.8.3 *Why we use this data*

The purpose of processing this data is to aid the recruitment process by:

- Enabling us to establish relevant experience and qualifications
- Facilitating safe recruitment, as part of our safeguarding obligations towards students
- Enabling equalities monitoring
- Ensuring that appropriate access arrangements can be provided for candidates that require them

3.8.4 *Our lawful basis for using this data*

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)
- We have legitimate interests in processing the data

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

3.8.5 *How we store, access and protect your data*

Personal data of trainees is stored on school databases. Access to personal data is restricted to those members of staff who have a requirement to maintain a relationship with you, and is controlled through password protection and user security profiles.

It is stored in line with our Records Management Policy. When it is no longer required, we will delete your information in accordance with our Records Retention Schedule.

3.8.6 *Data sharing*

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so. Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about you with:

- *Schools in the Astra Partnership with whom you may be placed as a trainee or those that may be involved in any interview process.*

- *Our PGCE Provider where you have applied for a PGCE course.*
- *OFSTED - who will require high level data to assess our recruitment performance against national objectives.*
- *The Disclosure and Barring Service, to carry out checks regarding your suitability to teach*
- *UCAS - including confirming success or otherwise of application.*
- *The Student Loan Company - to confirm that you have received a conditional offer on our course so that your loan application can be processed pending an offer being made final.*
- *Suppliers and service providers – to enable them to provide the service we have contracted them for, such as HR and recruitment support*
- *Professional advisers and consultants – to enable them to provide the service we have contracted them for*
- *Police forces, courts, tribunals – when we are legally obliged to do so.*
- *We may also share your data with organisations running trips and visits where you are accompanying students. This may result in your data being transferred to a different country. Where this is the case, appropriate safeguards are taken by us and our agents to ensure your data is protected.*

3.9 Visitors

3.9.1 Summary

DCGS collects and processes personal information about visitors. We are committed to being transparent about how we collect and use your data.

3.9.2 The personal data we hold

The categories of visitor information that may be collected, held, and shared include:

- Personal information - such as name, car registration details and photograph
- CCTV images when you visit the site

Whilst the majority of visitor information you provide to us is mandatory, some of it is provided to us on a voluntary basis. We will inform you whether you are required to provide certain visitor information to us or if you have a choice in this.

3.9.3 Why we use this information

We use the visitor data:

- to safeguard pupils
- to meet Health and Safety Legislation
- to meet Fire in the Workplace Legislation
- to keep the site secure and safe
- to assist with the organisation of events and meetings

3.9.4 Our lawful basis on which we use this information

We collect and use visitor information on the following bases:

- Public Interest - to support the learning and teaching of the school community
- Legal Obligation – to keep our pupils safe in terms of safeguarding
- Legal Obligation – meeting H&S and Fire in the Workplace Legislation
- Legal Obligation – meeting Safeguarding Legislation
- Contractual Basis - to fulfil a contract, eg. the letting of the school premises

3.9.5 How we store, access and protect your data

We store visitor data in the following ways:

- Our visitor signing-in system
- CCTV system

Your data is kept securely with appropriate security and access measures in place.

3.9.6 Who we share visitor information with

We may share visitor information with:

- Our visitor signing-in system provider
- The police
- Insurance companies
- HSE - for accident reporting
- Any requests from third parties in the event of a safeguarding incident

We do not share information about visitors with anyone without consent unless the law and our policies allow us to do so.

3.10 Contractors (Self Employed)

3.10.1 Summary

DCGS collects and processes personal information about contractors. We are committed to being transparent about how we collect and use your data.

3.10.2 The personal data we hold

We process data relating to those we contract, or otherwise engage, to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Photographs and video footage
- CCTV footage
- Data about your use of the school's information and communications system
- Evidence of DBS checks

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Where you have provided us with consent to use your data for non-mandatory purposes, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

3.10.3 Why we use this data

The purpose of processing this data is to help us run the school, including to:

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Allow better financial modelling and planning

3.10.4 Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

3.10.5 How we store, access and protect your data

We create and maintain files for each contract. The information contained in these files is kept secure and is only used for purposes directly relevant to your employment.

Once the contract with us has ended, we will retain these files and delete the information in it in accordance with our record retention schedule. Please note that we are required to keep certain financial information for set periods of time.

3.10.6 Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- *Your family or representatives – should we need to contact them in an emergency*
- *Our regulator Ofsted – for inspection and monitoring purposes*
- *Where appropriate (e.g. IR35) our payroll provider and HMRC*
- *Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll*
- *Our auditors – to enable them to provide the service we have contracted them for*
- *Professional advisers and consultants – to enable them to provide the service we have contracted them for*
- *Police forces, courts, tribunals – when we are legally obliged to do so*

3.11 Governors and Academy Trust Members

3.11.1 Summary

DCGS collects and processes personal information about Governors and Academy Trust Members during and after your relationship with us to manage that relationship. We are committed to being transparent about how we collect and use your data.

3.11.2 The personal data we hold

We process data relating to those we employ, or otherwise engage, to work at our school including those in a voluntary capacity. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Information required for statutory purposes such as registers of pecuniary interest that you or other members of your household may have in relation to school business, and information required to be provided to the DFE
- Contact details
- Curriculum Vitae or other profiles
- Next of kin and emergency contact numbers
- References, and where relevant DBS checks
- Information related to availability or periods of unavailability

3.11.3 Why we use this data

The purpose of processing this data is to help us run the school, including to:

- Facilitate safe recruitment of Governors or Academy Trust Members as part of our safeguarding obligations towards students
- Enable ethnicity and disability monitoring
- Support the work of staff and students at Dr Challoner's Grammar School
- To meet statutory requirements

3.11.4 Our lawful basis for using this data

There are a range of lawful reasons for holding your personal data, which include: legal obligation; and public interest.

3.11.5 How we store, access and protect your data

We create files for each Governor. The information contained in these files is kept secure with appropriate security measures in place. It is only used for purposes directly relevant to your role as a Governor and accessed by those staff authorised to do so.

DCGS considers its relationship with Governors to be long-term. This means that we will maintain a record for you until such time as you tell us that you no longer wish us to keep in touch. In this instance we will delete the majority of your personal data, but will maintain basic personal data to ensure that we do not inadvertently create a new record in the future.

3.11.6 Data Sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

However, it is a legal requirement that your name will be published on the School Website and the Statement of Accounts and that your information is shared as follows:

- *Companies House - to enable the School to be managed and run*
- *With our Auditors - to enable the financial monitoring of the School as is required by law*
- *Any other party required as required by the DFE*

Where it is legally required, or necessary (and it complies with data protection law), we may also share personal information about you with:

- *Suppliers and service providers – to enable them to provide the service we have contracted them for*
- *Professional advisers and consultants – to enable them to provide the service we have contracted them for*

- *Police forces, courts, tribunals – when we are legally obliged to do so*

3.12 Prospective students and their Parents / Guardians

3.12.1 Summary

DCGS collects and processes personal information about prospective students when they apply for a place at the school. This is to support the application process and safeguard you. We are committed to telling you about how we collect and use your data.

3.12.2. The personal data we hold - late transfer testing and Sixth Form Admissions

We hold some personal information about you to decide if you qualify for a place at Dr Challoner's Grammar School. While in most cases you, or your parents/carers, must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data.

We will always tell you if it's optional. If you must provide the data, we will explain what might happen if you don't.

In order to help you, we may also get information about you from some other places too – like other schools, the local council and the government.

This information may include, but is not restricted to:

- Your contact details
- Your test results
- Your attendance records
- Your characteristics, like your ethnic background or any special educational needs
- Details of any behaviour issues or exclusions
- Photographs
- Free School Meals entitlement
- SEND Status
- Looked after child status

3.12.3 The personal data we hold - when we are a test centre for The Buckinghamshire Grammar Schools (TBGS)

If you do not attend a state sector primary school in Buckinghamshire we will collect your Fit to Test Form when you sit your test on behalf of The Buckinghamshire Grammar Schools (TBGS). This information includes:

- a photograph of you
- information about medical issues
- the contact details of your parent/carer

3.12.4 Why we use this data - when you come to sit the Secondary Transfer Test

We use this data to administer the Secondary Transfer Test on behalf of TBGS. Specifically we will use this data to:

- Get in touch with your parents should you have any problems or feel unwell
- Ensure that we can correctly identify you

The Fit to Test Forms are then passed on to TBGS who will process your data. For details of their Privacy notice please visit their [website](#).

3.12.5 Why we use this data - late transfer testing and Sixth Form Admissions

We use this data to help comply with our Admissions Policies and to:

- Get in touch with you and your parents when we need to
- Check if you meet our admissions criteria
- Ensure that we can correctly identify you
- Look after your wellbeing if you come here to sit an exam

3.12.6 The Appeals Process

During the Appeals Process, the Clerk to the Independent Appeals Panel will collect information and data which is stored on the school's server and storage platforms. Copies are then held by the school for administration purposes. The school requests information from Buckinghamshire Council to be included in the school's appeals case. This information is kept by both parties only for as long as is necessary for the Appeals process and is securely destroyed in line with our Retention Schedule

3.12.7 Our lawful basis for using this data

We will only collect and use your information when the law allows us to. Most often, we will use your information where:

- We need to comply with the law
- We need to use it to carry out a task in the public interest (in order to potentially provide you with an education)

Sometimes, we may also use your personal information where:

- You, or your parents/carers have given us permission to use it in a certain way
- We need to protect your interests (or someone else's interest)

Where we have permission to use your data, you or your parents/carers may withdraw this at any time. We will make this clear when we ask for permission, and explain how to go about withdrawing permission.

Some of the reasons listed above for collecting and using your information overlap, and there may be several grounds which mean we can use your data.

3.12.8 How we store, access and protect your data

We will create files for every student seeking a place at the school. The information contained in these files is kept secure with appropriate security measures in place.

We will keep personal information about you while you are applying for a place.

We have a record retention schedule which sets out how long we must keep information about students and prospective students. We will destroy your data in accordance with it.

3.12.9 Data sharing

We do not share personal information about you with anyone outside the school without permission from you or your parents/carers, unless the law and our policies allow us to do so.

Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you with:

- *Your family and representatives - where it is in your legitimate interest*
- *The Buckinghamshire Grammar Schools when you attend for Secondary Transfer Testing*