UPPINGHAM

Privacy Notice

WHO WE ARE

Uppingham School is a co-educational boarding school registered as a charity (number 1147280) and as a company limited by guarantee (number 08013826).

Uppingham School Enterprises Limited (company number 01130851) is the trading subsidiary of Uppingham School, managing the commercial activities that take place at the School, including *Uppingham School Sports Centre* (USSC), and the *Uppingham School Shop*.

Our registered address is Uppingham School, High Street West, Uppingham, Rutland, LE15 9QD.

WHAT THIS PRIVACY NOTICE IS FOR

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

This makes the School a data controller of your personal information and this information is provided because data protection law gives individuals rights to understand how their data is processed and this Privacy Notice sets out how we will use that information and what your rights are in respect of the data we hold about you.

This notice applies alongside any other information we may provide about a particular use of personal data, for example if the School needs to collect specific information via a questionnaire or form. It also applies in addition to any other relevant terms and conditions, or School policies, including:

- Any contract between the School and the parents of pupils (the "Parent Contract");
- The School's Safeguarding and Child Protection Policies;
- The School's CCTV Policy;
- The School's Use of Images Policy;
- The School's Information Security Policy and Acceptable Use Policy; and
- The School's Retention of Records Policy.

RESPONSIBILITY FOR DATA PROTECTION

All staff at Uppingham have a responsibility to handle any personal data they come into contact with fairly, lawfully, responsibly and securely.

The School has appointed the Bursar as the Privacy and Compliance Officer, who will endeavour to ensure that all personal data is processed in compliance with this policy and the principles of the Data Protection Act 2018.

If you have any questions about this notice, please contact the Bursar at data@uppingham.co.uk c/o Uppingham School, Uppingham, Rutland, LE15 9QD.

WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

To carry out its day-to-day responsibilities to staff, pupils, and parents, the School must process a broad range of personal data about members of its community.

Some of this processing is necessary for the School to meet its legal rights, duties, and obligations, including those arising under contracts with staff and parents of pupils.

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

The School expects that the following uses will fall within that category of our (or our community's) "**legitimate interests**" (as recognised in law or determined by the School):

- For the purposes of pupil selection, to confirm the identity of prospective pupils and their parents, assess suitability for bursaries, and retain a record (if appropriate) for the purposes of future applications or openings;
- To carry out credit, identity and source of funds checks, whether with previous schools and/or third-party sources or service providers, including for the purposes of verifying that parents are not subject to (or within the purview of) sanctions;
- To carry out anti-money laundering checks, as required by the National Crime Agency.
- To provide education services (including musical education, physical training or spiritual development, career services, and extra-curricular activities to pupils), and monitoring pupils' progress and educational needs, including where such services are provided remotely (either temporarily or permanently);
- 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 maintain relationships with alumni and the School community, including by direct marketing or fundraising activity;
- For the purposes of donor due diligence, and to confirm the identity of prospective donors, their background, and relevant interests;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past and current pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the School;
- To safeguard pupils' health and welfare and provide appropriate pastoral care (including following the requirements and recommendations of the government's guidance on *Keeping Children Safe in Education* (or "KCSIE");
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's Acceptable Use Policy;
- To make use of photographic images and video content of pupils in School publications, on the School website and (where appropriate) on the School's social media channels (including any streaming of live events) in accordance with the School's policy on taking, storing and using images of children;
- For security purposes, including ANPR and CCTV, in accordance with the School's CCTV policy;
- For the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities;
- For regulatory record keeping and compliance purposes in respect of immigration requirements, both as an employer and visa sponsor;
- To carry out or cooperate with any School or external complaints, disciplinary or investigation process;
- To promote the School to prospective parents and pupils; and
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the school.

In addition, the School will on occasion need to process **special category personal data** (concerning health, ethnicity, religion, or sexual life) or criminal records information (such as when carrying out DBS

checks) in accordance with rights or duties imposed on us by law, including as regards safeguarding, or from time to time by explicit consent where required. These reasons will include:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's health / medical condition or other relevant information where it is in the individual's interests to do so: for example for emergency medical care, to arrange the assessment and diagnosis of a pupil's health and medical conditions and special educational needs, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs;
- To comply with public health requirements;
- To provide educational services in the context of making reasonable adjustments for a pupil's disability and/or any special educational needs of a pupil;
- As part of any School or external complaints, disciplinary or investigation process that involves such data, for example if there are SEND, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring, health and safety and immigration / visa sponsorship compliance) and to comply with our legal obligations and duties of care.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);
- bank details and other financial information, e.g. about parents (or others) who pay fees to the School, and any source of funds and/or anti-money laundering information we are required to collect by law;
- personal data monitored by anti-money laundering agencies;
- past, present and prospective pupils' academic, disciplinary, admissions, safeguarding and attendance records, and examination scripts and marks;
- Nationality and other immigration status information (e.g., right to enter, live and study in the United Kingdom), including copies of passport information;
- information about pupils' health and medical conditions, special educational needs and family circumstances / living arrangements;
- contact details for next of kin;
- references given or received by the School about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- correspondence with and concerning pupils and parents (past and present); and
- images and video content of pupils (and occasionally other individuals) engaging in School activities, including content captured by the school's CCTV system, and as part of filming, recording or streaming of School events (in accordance with the school's policy on taking, storing and using images of children).

HOW THE SCHOOL COLLECTS DATA

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

However, in some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities, or third-party service providers who credit and identity check parents and their source of funds); or collected from publicly available resources.

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

Processing by third parties

For the most part, personal data collected by the School will remain within the School and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). However, some functions are outsourced, for example mailing houses, statistical research and analysis providers, IT systems providers, web developers, or cloud storage providers. In accordance with data protection law, this type of external data processing is always subject to contractual assurances that personal data will be kept securely and used only in accordance with the school's specific directions.

Data sharing

Occasionally, the School – including its trustees – will need to share personal information relating to its community of pupils and parents with third parties, such as:

- appropriate contractors, such as visiting music teachers, or external investigators and consultants;
- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- examination boards;
- Stage 3 complaints panels, which may include independent panel members such as when a complaint is raised (and in accordance with the School Complaints Procedure, this requires the involvement of independent panel members);
- third parties and their advisers in the event of a possible or actual sale, merger or other restructuring of the school; and
- government authorities (e.g. HMRC, DfE, CAFCASS, police, Home Office, National Crime Agency, a relevant public health / NHS body and / or local authority) and/or appropriate regulatory bodies e.g. the Teaching Regulation Agency, the Independent Schools Inspectorate, the Charity Commission, etc.

ACCESS TO, AND SHARING OF, SENSITIVE DATA

Particularly strict rules of access apply in the context of "special category" data, most notably:

- health and medical / special needs records; and
- pastoral or safeguarding files.

Medical / health data

The School needs to process such information to comply with statutory duties and to keep pupils and others safe, but the School will ensure only authorised staff can access information on a need-to-know basis. This may include wider dissemination if needed, for example for School trips or for catering purposes. Express consent will be sought where appropriate.

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

Safeguarding data

The School is under duties imposed by law and statutory guidance (including **Keeping Children Safe in Education** or 'KCSIE') 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 notes on personnel or safeguarding files, low-level concerns records kept about adults (which may include references to pupils or family members), and in some cases referrals to relevant authorities such as the LADO, Children's Services, CAMHS or the police.

KCSIE also requires that, whenever a child leaves the School to join another school or college, his or her child protection file is promptly provided to the new organisation, along with any other information which the School's *Designated Safeguarding Lead* considers material to the ongoing care needs of any pupil. Where appropriate, the School will consult with parents as to how these needs are best served, but ultimately the decision as to what information is necessary to share with the new school or college is a safeguarding question that must be reserved to the School. The School will retain a copy of the child protection file in accordance with its retention policy for material related to safeguarding matters.

For further information about this, please view the School's Safeguarding (Child Protection) Policy.

WOODFIELD HEALTH CENTRE

Woodfield Health Centre looks after pupils' all-round health and wellbeing by promoting good health and healthy lifestyles, as well as treating ill health and accidents as they arise.

It is professionally equipped and staffed by registered nurses and counsellors to provide a 24-hour service during term time.

Staff at Woodfield Health Centre are governed by their professional codes of practice, including minimum standards for patient confidentiality. Wherever possible staff at Woodfield will uphold patient confidentiality, but where in the interests of patient safety or public protection, they may occasionally share information with other areas of the School (for example house staff or the safeguarding team) on a "need to know" basis.

HOW LONG WE KEEP PERSONAL DATA

The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary parent and pupil files is up to seven years following departure from the School. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

If you have any specific queries about how our retention policy is applied or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Bursar at data@uppingham.co.uk. However, please bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data even following such request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested, we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

The philanthropic contribution of the Uppingham community has enabled numerous children to access the financial support they need to study at Uppingham and supported constant investment in the School campus, maintaining Uppingham's reputation as one of the finest independent schools in the UK.

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

Our community includes a number of generous individuals who support the School by sharing their networks and by making major donations. We prepare thoroughly and carefully for individual meetings and bespoke events with this small group of supporters to make our contact with them as meaningful as possible.

We may research an individual's professional and charitable interests, using publicly available sources,

and their likely capacity to support Uppingham School. We use this information to help us identify which aspects of the School's activities are the best match to an individual's philanthropic ambitions.

Individuals 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 personal details (not least to ensure that no more communications are sent to that particular address, email or telephone number). Should an OU or parent wish to limit or object to any such use, or would like further information, please contact the Bursar at data@uppingham.co.uk.

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).

OU ASSOCIATION

The OU Association is an unincorporated association that unites and supports alumni of Uppingham School, connecting members socially and professionally, and sharing news and stories with the alumni community.

The OU Association allows the School to stay in touch with its former pupils, keeping them updated about the activities of the School, for example by arranging events or sending regular newsletters or updates.

Where alumni or parents give their prior consent, the School may share personal data with organisations set up to help establish and maintain relationships with the School community, such as the *Friends of Uppingham* and *The OU Charity Fund*.

UPPINGHAM SCHOOL HISTORIC ARCHIVE

Uppingham School maintains a private historic archive as a record of school life and pupil's achievements. As part of the archive, the School keeps a register of former pupils.

Information about individual pupils, members of staff, and trustees held in the archive is intended for use in responding to queries from Old Uppinghamians (OUs), historical researchers, and other individuals with an interest in Uppingham's history.

The School occasionally receives requests from third parties, such as researchers or authors, wishing to access information held in the School's historical archives about individuals associated with the School, particularly where they have gone on to become famous or hold a pre-eminent position in later life. The School will seek prior permission from the individual concerned (or their legal representative), prior to granting access.

YOUR RIGHTS

Individuals (both pupils and parents) have various rights under data protection law to access and understand their own personal data held and processed by the School, and in some cases ask for it to be erased or amended, or to have it transferred elsewhere, or for the School to stop processing it – but subject to certain exemptions and limitations.

The School will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is generally one month, but fulfilling more complex or multiple requests, e.g. those involving third party information, may take 1-2 months longer).

Rights of access

The School will be better able to respond quickly to smaller, targeted requests for information made during term time. If the request for information is manifestly excessive or similar to previous requests, the school may ask you to reconsider, or require a reasonable fee for the administrative costs of complying with the request, or in certain cases refuse the request (but only where data protection law allows it, and in accordance with relevant regulatory guidance).

If you consider that the personal data we hold on you is inaccurate, please let us know. However, the School will not necessarily delete or amend views, opinions, notes or records purely on the request of an individual who disputes the account, although we may keep a record of all parties' viewpoints.

Requests that cannot be fulfilled

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

The School is also not required to:

- disclose any pupil examination scripts (or other information consisting solely of pupil test answers, potentially including in mock exam scripts or other types of exams / tests used to assess performance – although markers' comments may still be disclosable if they constitute pupil personal data); or
- provide examination or other test marks ahead of their ordinary publication date, nor share any confidential reference held by the school that was (or will be) given for the purposes of the education, training, appointment or employment of any individual.

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

Requests by or on behalf of pupils

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

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger pupils, the law still considers the information in question to be the child's. For older pupils, the parent making the request may need to evidence their child's authority for the specific request. Requests not considered in the child's best interests may sometimes be refused.

Pupils aged 12 and above are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home. Slightly younger children may however be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

Parental requests

It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about pupils without their consent. The School may consider there are lawful grounds for sharing with or without reference to that pupil.

Parents will in general receive educational and pastoral updates about their children, in accordance with the Parent Contract. Where parents are separated, the School will in most cases aim to provide the same information to each person with parental responsibility but may need to factor in all the circumstances including the express wishes of the child, court orders, or pastoral issues.

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

Consent

Where the School is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). For example, the School may request consent from pupils, or their parents, where the School wishes to use an image of the child in its marketing material. Please be aware however that the School may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this Privacy Notice or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because a purchase of goods, services or membership of an organisation such as an alumni or parents'

association has been requested).

Whose rights?

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

Where consent is required, it may in some cases be necessary or appropriate – given the nature of the processing in question, and the pupil's age and understanding – to seek the pupil's consent, either alongside or in place of parental consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

In general, the School will assume that pupils' consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare. 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, the School may be under an obligation to maintain confidentiality unless, in the School's opinion, there is a good reason to do otherwise; for example where the School believes disclosure will be in the best interests of the pupil or other pupils, or if required by law.

Pupils are required to respect the personal data and privacy of others, and to comply with the School's Acceptable Use Policy and the School rules.

DATA ACCURACY AND SECURITY

The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals should contact the Admissions Department at admissions@uppingham.co.uk to notify the School of any significant changes to important information, such as contact details.

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

The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems.

THIS POLICY

The School will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable. This Privacy Notice was last updated in May 2026.

QUERIES AND COMPLAINTS

If you believe that the School has not complied with this Privacy Notice or acted otherwise than in accordance with data protection law, you should contact the Bursar at data@uppingham.co.uk with details of your complaint. The School will acknowledge your complaint within 30 days of receipt and will investigate and inform you of the outcome of your complaint without undue delay (keeping you informed of progress as necessary

If you are not satisfied with the outcome of your complaint, or if you feel the School has not handled it appropriately, you have the right to complain to the Information Commissioner's Office (ICO).

If you have any comments or queries about this notice, please contact the Bursar at data@uppingham.co.uk c/o Uppingham School, Uppingham, Rutland, LE15 9QD.

The School may update this Privacy Notice from time to time. Where there are substantial changes that may affect your rights, the School will use all reasonable endeavours to notify you directly.