RYDE SCHOOL
WITH UPPER CHINE

Privacy Notice

Policy date:	September 2026	
Date of next review:	Summer Term 2026-27	
Owner(s):	SHRW	
Approval body:	Head Master and Governors	
Intended audience:	Pupils, parents and staff	
ISI Regulatory Paragraph No:		
Location (tick as appropriate):	Website	✓
	Parent Portal	✓
	Staff Portal	✓
	Inspection folder	

This Privacy Notice covers uses of staff and alumni data as well as that of parents and pupils; prospective, current and past.

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WHO WE ARE

Ryde School is an Independent co-educational day and boarding school on the Isle of Wight for children aged 2 to 18. Ryde School is a company limited by Guarantee No. 432077. Ryde School is a Registered Charity No. 307409. Our registered address is:

Ryde School
Queen's Road
Ryde
Isle of Wight
PO33 3BE

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: its staff; its current, past and prospective pupils; and their parents, carers or guardians (referred to in this Privacy Notice as "parents"). Collectively, we refer to these individuals in the Privacy Notice as the School's community.

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. 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. Staff, parents and pupils are all encouraged to read this Privacy Notice and understand the School's obligations to its entire community.

This Privacy Notice applies alongside any other information the School may provide about a particular use of personal data, for example when collecting data via an online or paper form.

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

- any contract between the School and its staff or the parents of pupils;
- any policies or notices applicable to staff concerning the handling of personal data
- the School's procedures on obtaining, storing and using biometric data, see Appendix 1
- the School's procedures on taking, storing and using images of children, see Appendix 2
- the School's CCTV Policy
- the School's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the School's IT policies

Anyone who works for, or acts on behalf of, the school (including staff, volunteers, governors and service providers) will be subject to suitable training and/or policies commensurate with their role.

RESPONSIBILITY FOR DATA PROTECTION

- The School has appointed the Compliance Officer as Data Handler who will deal with all requests and enquiries concerning the School's uses of personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this Privacy Notice and Data Protection Law.

The Data Handler can be contacted via the postal address shown above or email ComplianceOfficer@rydeschool.net

WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to staff, pupils and parents, the School needs to process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of its daily operations.

Some of this activity the School will need to carry out in order to fulfil its legal rights, duties or obligations – including where we have a legal obligation to share safeguarding information. Some processing will be necessary in order to fulfil our rights and obligations under a contract with its staff, or parents of its pupils.

Other uses of personal data will be made in accordance with the School's legitimate interests, or the legitimate interests of another, 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 its (or its community's) "**legitimate interests**" (as recognised in law or determined by the School):

- To provide services, activities or online content, to provide information about them and to deal with requests and enquiries
- 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 provide education services (including SEND), including musical and physical education, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- To report 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;
- Maintaining relationships with alumni and the school community, including direct marketing or fundraising activity;
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and 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 and 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, current and prospective pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils;
- To promote and raise funds for the School;
- 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 (of KCSIE);
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's Internet, Email and IT 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 procedures on taking, storing and using images of children, referenced in the attached appendix;
- For security purposes, including biometrics and CCTV in accordance with the School's procedures on obtaining, storing and using biometric data and taking, storing and using images of children;
- For regulatory record keeping/compliance purposes in respect of immigration requirements as an employer and/or visa sponsor;
- 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;
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process;
- To promote the School to prospective parents and pupils;
- For security purposes and for regulatory and legal purposes (for example child protection and health and safety) and to comply with its legal obligations: 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 biometrics) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required, for example if the School commissioned any biometric services. 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;
- In connection with employment of its staff, for example DBS checks, welfare, union membership or pension plans, and in a pastoral, complaint, or disciplinary context;
- To run any of our systems that operate on biometric data, such as fingerprint recognition for granting and monitoring security access to buildings and the wider School site and accessing catering provision, see Appendix 1.
- 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 its 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);
- biometric information, collected and used by the School in accordance with its procedures on obtaining, storing and using biometric data, (see Appendix 1). Biometric data will only ever be collected by Ryde School with the individual's explicit consent;
- bank details and other financial information, e.g. about parents who pay fees to the School, and any source of funds and/or anti-money laundering information we are required to collect by law;
- past, present and prospective pupils' academic, disciplinary, admissions, safeguarding and attendance records (including information about any special needs), and examination scripts and marks;
- personnel files, including in connection with academics, employment or safeguarding;
- nationality and other immigration status information (e.g. right to enter, live and work or study in the UK), including copies of passport information;
- information about individuals' health and medical conditions, special educational needs and family circumstances / living arrangement;
- contact details for their 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 staff, 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 procedures 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 working with that individual); an example of this may be information received from a third party agency for safeguarding reasons, in accordance with Working Together to Safeguard Children. It may also receive personal data collected from publicly available resources.

Ryde School also collects information about users of our Ryde School website. This includes collecting unique online identifiers such as IP addresses, which are numbers that can uniquely identify a specific computer or other network device on the internet. See the Ryde School Website section later in this document.

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 including payroll, IT and cloud storage. 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 governing board will need to share personal information, which may include special category data where required, relating to its community with third parties, such as;

- appropriate contractors, such as visiting music teachers, or external investigators and consultants;
- examination boards;
- Stage 3 complaints panels, which will include independent panel members (occasionally the School Governors will need to process parent, pupil or staff information, such as when a complaint is raised (and in accordance with the School's Complaints Procedures, this may also require 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;
- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- government authorities (e.g. HMRC, DfE, CAFCASS, police, Home Office, a relevant public health/NHS body and/or the local authority);
- appropriate regulatory bodies (e.g. TRA, the Independent Schools Inspectorate, the Charity Commission or the Information Commissioner); and
- third party service providers for the purpose of educational and extra-curricular provision. Examples of such providers will include:

o External activities providers
o Travel operators
o School photographer

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 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 the pupil requires.

Safeguarding data: Staff, pupils and parents are reminded that the School is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education (KCSIE) and the Children Act 2004) 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, or where other statutory requirements are met. This is likely to include file 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 (Local Authority Designated Officer), Children's Services, CAMHS or the police.

The School is subject to a specific statutory duty to share information with certain organisations (including, but not limited to, local authorities, NHS Trusts, the police and other schools) where it is relevant to safeguarding and promoting a child's welfare. There is no threshold of risk or harm that needs to be met to trigger this duty and the only exception to it is in rare circumstances where sharing information would be more detrimental to the child than not sharing. Where the duty applies, confidential information can be shared without consent.

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 in accordance with guidelines related to safeguarding matters.

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

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 staff and pupil personnel files is up to 7 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.

Specific queries about how we retain or archive data, or requests that personal data is considered for erasure are to be made to the Data Handler via ComplianceOfficer@rydeschool.net. However, bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data even following such a request.

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

KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

The School and/or any relevant other organisation, e.g. alumni / development will use the contact details of parents, alumni and other members of the School community to keep them updated about the activities of the School, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the school will also:

- Share personal data about parents and / or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the school community, such as the Old Rydeians' Association, the Upper Chine Old Girls' Association, and the Old Bembridgians' Association,
- Contact parents and/or alumni (including via the organisations above) by post and email in order to promote and raise funds for the School and, where appropriate, other worthy causes;
- Collect information from publicly available sources about parents' and former pupils' occupations and activities, in order to maximise the School's fundraising potential;

Should you wish to limit or object to any such use, or would like further information about them, please contact the Data Handler in writing at the School's registered address or email ComplianceOfficer@rydeschool.net. 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).

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

have it transferred elsewhere or for the School to stop processing it, but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the Data Handler at the School's registered address or email ComplianceOfficer@rydeschool.net.

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 actually fulfilling more complex or multiple requests, e.g. those involving third party information, may take 1-2 months longer).

- Rights of access etc.

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 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 any 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 13 and above are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home. Slightly younger children / older Prep School children may however be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

- Parental requests, etc.

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 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). Examples where we do rely on consent are certain types of uses of images, use of biometric data and certain types of fundraising activity. 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 Ryde School's Internet, Email and IT Acceptable Use Policy and the school rules. Staff are under professional duties to do the same covered under the relevant staff policy.

DATA ACCURACY AND SECURITY

The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the Data Handler of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): 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. All staff and governors will be made aware of this Privacy Notice and their duties under Data Protection Law.

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 so far is reasonably practicable.

QUERIES AND COMPLAINTS

If you believe the School has not complied with this Privacy Notice or acted otherwise than in accordance with data protection law, you should email the School's Data Handler via complianceofficer@rydeschool.net 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, https://ico.org.uk/).

RYDE SCHOOL WEBSITE

Ryde School's Privacy Notice (including Website privacy) is applicable to all members of the School community (prospective, current and past)

Ryde School with Upper Chine maintains this website www.rydeschool.org.uk ("the Site") and the information and materials on the Site ("Content").

Disclaimer. Whilst **Ryde School with Upper Chine** takes care to ensure the accuracy of the Content, to the extent permitted by law, **Ryde School with Upper Chine** assumes no legal liability for and does not warrant that the information contained on this website is accurate or complete, or that these web pages will be free from errors or that its availability will be uninterrupted and **Ryde School with Upper Chine** hereby expressly disclaims and excludes all express and implied warranties terms or conditions not stated herein, so far as such exclusion or disclaimer is permitted under the applicable law. **Ryde School with Upper Chine** excludes all liability to any person for any loss or damage caused by any errors or omissions, whether such errors or omissions result from negligence, accident or any other cause but this disclaimer is without prejudice to any claims for fraudulent misrepresentation, personal injuries or death.

Restrictions on Use of Content. The Content of this website and all copyright and other intellectual property rights therein belong to **Ryde School with Upper Chine** or its Content providers. You are hereby granted permission to access the Site and print a copy of the Content as a record of your visit. All other use of the Site and its Content, including modification, publication, transmission, creation of derivative works, incorporation into another

web site or reproducing the Site or the Content (whether by linking, framing or any other method) is not permitted without **Ryde School with Upper Chine**'s prior express written consent.

PRIVACY

This privacy policy (this " Policy") explains how personal information is collected, used, and disclosed by **Ryde School with Upper Chine** (collectively, " Ryde School", "Ryde School with Upper Chine", "we", "our" or "us"). This Policy applies to visitors and users (individually, "you") of **Ryde School with Upper Chine** website. By visiting or using the Site to the extent permitted by applicable law, you are consenting to us gathering and processing information about you in accordance with this Policy, although consent may not be required for all of the elements described in this Policy. For particular types of information or processing, we may provide you with choices or request your further consent related to what information we collect and how we may process it.

This Policy does not cover third parties or their services and we do not take any responsibility for how such third parties may use any information they collect. For information about third-party privacy practices, please consult with them directly.

Ryde School with Upper Chine has an over-arching Privacy Notice, the terms detailed on this web page relate to the use of information collected through the website only.

I. INFORMATION COLLECTED THROUGH THE WEBSITE

Personal Information. By visiting or using the Site, we may collect the following categories of personal information (" personal information ") you provide to us: name; title; email address; postal address; phone number (including your mobile phone number); children's names; job role; marketing responses; admissions follow-ups; and other information you may provide about yourself to the Site or to which you provide us with access via third-party platforms.

We do not proactively collect personal information considered as sensitive personal information such as health-related or financial information on the Site. However, our Site may include text boxes which are designed for you to provide your choice of certain information about your marketing preferences.

If you are an existing **Ryde School with Upper Chine** family, we will combine this information with information we collect on the Site and use it for the purposes described below.

Device Information. When you visit the Site or open communications (such as emails) , some information is automatically collected from devices (e.g., mobile, computer, laptop, tablet) used to visit or use the Site including, but not limited to, operating system, access times, browser information (e.g., type, language, and history), settings, and other data about your device that we use to provide the services or as otherwise described in this Policy (" device information"). We also collect information about your usage and activity on the Site using certain technologies, such as cookies, web beacons and other technologies (**see V Cookies** and Other Tracking Technologies for more details).

Location Information. If you use our Site, we may receive your generic location (such as city or neighbourhood). We may use and store this information to provide and improve features of the Site, for example, to tailor the Site on a needs-based manner to better facilitate your requests and to provide you more relevant content.

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II. HOW WE USE YOUR INFORMATION

We may use your information for the following purposes (" Purposes"), to: provide you with the services, and functionality offered through the Site and fulfil your requests, including, but not limited to; communicate with you about your enquiry or use of the Site, services, or functionality; respond to, or follow up on, your comments and questions, and otherwise provide customer service; communicate with you about special events and other marketing communications; operate and improve the Site, services, and functionality; process and provide events to attend; if applicable; tailor your experience on the Site, including search results and displaying relevant promotions; link or combine with other information we get from third parties to help understand your needs and provide you with better service; perform statistical analysis; protect, investigate, and deter against fraudulent, unauthorised, or illegal activity; comply with our policies, procedures and legal obligations; and as otherwise consented to by you and as required or permitted by applicable law.

If you do not provide us with certain of your information, we may not be able to fulfil the requested Purpose of collection, such as to respond to your queries or provide the Site to you.

Combined Information. We may combine your personal information with device information and location information (with your consent, where required) to serve you specifically, such as to deliver a service to you according to your preferences or restrictions, or for advertising or advertising targeting purposes. When we combine personal information, device information and location information in this way, we treat it as, and apply all of the safeguards in this Policy applicable to, your information.

Electronic Communications. Consistent with the above Purposes, we may communicate with you via electronic messages, including email, text message, or mobile push notification to, for example: send you information relating to our school, including event reservation and waitlist confirmations and updates, receipts, technical notices, updates, security alerts, and support and administrative messages; and/or, subject to the Your Choices section, below, and/or applicable law, communicate with you about events, offers, promotions, upcoming events, and other news about services offered by **Ryde School with Upper Chine**.

Retention. We will retain your information for the period necessary to fulfil the Purposes outlined in this Policy and as otherwise needed to comply with applicable law and internal company policies.

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III. HOW WE SHARE YOUR INFORMATION FROM THE WEBSITE

We do not share your information with third parties other than as described above and as follows:

We may disclose your information to regulatory authorities, courts, government agencies and other third parties where we believe that doing so would be in accordance with or permitted or required by any applicable law, regulation or legal process, to defend the interests, rights, and/or property of Ryde **School with Upper Chine** or others, or to respond to emergencies.

We may otherwise share your information as directed by you or subject to your consent.

Information You Share Socially. The Site may allow you to connect and share your actions, comments, content, and information publicly or with friends. The Site may also allow you to connect with us on, share on, and use third-party platforms, including those on which **Ryde School with Upper Chine** has a presence. Please be mindful of your personal privacy needs and the privacy needs of others as you choose whom to connect with and what to share and make public. We cannot control the privacy or security of information you choose to make public or share with others. **Ryde School with Upper Chine** also does not control the privacy practices of third-party platforms. Please contact those sites and services directly to learn about their privacy practices.

Ryde School with Upper Chine has an over-arching Privacy Notice, the terms detailed on this web page relate to the use of information collected through the website only.

IV. SECURITY OF YOUR INFORMATION

Ryde School with Upper Chine takes commercially-reasonable technical, administrative, and physical security measures designed to protect your information from loss, misuse, unauthorised access, disclosure, alteration, and destruction.

When a credit or debit card account information is being transmitted to the Site or through the Site, it will be protected by cryptographic protocols. To be clear, **Ryde School with Upper Chine** website does not itself store your credit or debit card account information, and we do not have direct control over or responsibility for your credit or debit card account information. We use third party payment processors that are the controllers of your credit card information. Our contracts with third parties that receive your credit or debit card account information require them to keep it secure and confidential.

Nonetheless, we cannot guarantee that transmissions of your credit or debit card account information or your other information will always be secure or that unauthorised third parties will never be able to defeat the security measures taken by **Ryde School with Upper Chine** or our third-party service providers. Except to the extent that liability cannot be excluded or limited due to applicable law, we assume no liability or responsibility for disclosure of your information due to errors in transmission, unauthorised third-party access, or other causes beyond our control. You play an important role in keeping your information secure. You should not share your user name, password, or other security information for your **Ryde School with Upper Chine** account with anyone. If we receive instructions using your user name and password, we will consider that you have authorised the instructions.

How we secure your data. Information system and data security is imperative to us to ensure that we are keeping our clients and subscribers happy.

We operate a robust and thorough process for assessing, managing and protecting new and existing systems which ensures that they are up to date and secure against the ever-changing threat landscape.

When you trust us with your data we will always keep your information secure to maintain your confidentiality. By utilising strong encryption when your information is stored or in transit we minimise the risk of unauthorised access or disclosure; when entering information on the Site, you can check this by right clicking on the padlock icon in the address bar.

Storage of information. The **Ryde School with Upper Chine** hosting operations are based in the UK and we store most of our data within the European Union (EU). Some organisations which provide services to us may transfer data outside the European Economic Area but we'll only allow this if your data is adequately protected. Some of our social media channels are provided by US companies and whilst it is our policy that we prefer data hosting and processing to remain on EU-based solutions, it may be that using their products results in data transfer to the USA. However, we only allow this when we are certain it will be adequately protected. (e.g. US Privacy Shield or Standard EU contractual clauses).

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V. COOKIES AND OTHER TRACKING TECHNOLOGIES

We collect information about your usage and activity on the Site using certain technologies, such as cookies, web beacons, and other technologies. We and our third-party service providers, and/or partners may also place web beacons for measuring sales and marketing campaigns. The use of these technologies by such third parties is subject to their own privacy policies and is not covered by this Policy, except as required by law. Cookies can be managed via the footer of the home website page.

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VI. YOUR CHOICES

Email. If you do not want to receive marketing and promotional emails from **Ryde School with Upper Chine**, you may click on the "unsubscribe" link in the email to unsubscribe and opt-out of marketing email communications.
Alternatively, to the extent that applicable law requires your prior opt-in consent to receive marketing and promotional emails, you can choose not to opt-in. Please note that even if you opt-out of receiving marketing communications from the Site, we may need to send you service-related communications, such as confirmations of any future reservations to our events.

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VII. YOUR RIGHTS

You have the right to request:

- Access to the personal data we hold about you, free of charge in most cases.
- The correction of your personal data when incorrect, out of date or incomplete.
- That we stop using your personal data for direct marketing (either through specific channels, or all channels).
- That we stop any consent-based processing of your personal data after you withdraw that consent.
- You can Contact Us to request to exercise these rights at any time, below.

If we choose not to action your request we will explain to you the reasons for our refusal.

Your right to withdraw consent. Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

Where we rely on our legitimate interest. In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

Direct marketing. You have the right to stop the use of your personal data for direct marketing activity through all channels, or selected channels. We must always comply with your request.

Keeping your information. We will only use and store your information for as long as it is required for the purposes it was collected for. How long it will be stored for depends on the information in question, what it is being used for and, sometimes, statutory legal requirements.

Ryde School with Upper Chine has an over-arching Privacy Notice, the terms detailed on this web page relate to the use of information collected through the website only.

VIII. LINKS TO OTHER WEBSITES

The Site may contain links to other websites or services that are not owned or controlled by **Ryde School with Upper Chine**. This Policy only applies to information collected by the Site. We have no control over these third party websites, and your use of third party websites and features are subject to privacy policies posted on those websites. We are not responsible or liable for the privacy or business practices of any third party websites linked to the Site. Your use of third parties' websites linked to the Site is at your own risk, so we encourage you to read the privacy policies of any linked third party websites when you leave one of the Site.

Ryde School with Upper Chine has an over-arching Privacy Notice, the terms detailed on this web page relate to the use of information collected through the website only

IX. CHANGES TO THIS POLICY

Except to the extent limited by applicable law, we reserve the right to update this Policy to reflect changes to our information practices by prominently posting notice of the update on the Site, and as required, obtaining your consent. Any updates will become effective immediately after posting the updates to this Policy and apply to all information collected about you, or where required, upon your consent. You agree that you will review this Policy periodically. If we make any changes to this Policy, we will change the "Last Updated" date at the top. You are free to decide whether or not to accept a modified version of this Policy, but accepting this Policy, as modified, is required for you to continue using the Site. If you do not agree to the terms of this Policy or any modified version of this Policy, your sole recourse is to terminate your use of the Site.

If we make any changes to this Policy that materially impacts previously collected information about you, we will obtain your prior express consent.

Ryde School with Upper Chine has an over-arching Privacy Notice, the terms detailed on this web page relate to the use of information collected through the website only.

Appendix 1

A. Procedures on obtaining, storing and using biometric data (Pupils under 18 years old)

The School ensures that pupils' biometric data is collected with appropriate care and complies with the data protection principles as set out in the General Data Protection Regulations (UK GDPR) 2018. As part of its automated biometric recognition system, the School must also comply with the additional requirements in sections 26 to 28 of the Protection of Freedoms Act 2012.

The School ensures that each parent of a pupil (under 18 years old) is notified of the School's intention to use the pupil's biometric data as part of its automated biometric recognition system.

The written consent of at least one parent must be obtained before the data is taken from the pupil (under 18 years old) and used i.e., 'processed'. In no circumstances can a pupil's biometric data be processed without written consent.

The School will not process the biometric data of a pupil (under 18 years of age) where:

a. The child (whether verbally or non-verbally) objects or refuses to participate in the processing of their biometric data;
b. No parent has consented in writing to the processing; or
c. A parent has objected in writing to such processing, even if another parent has given written consent.

The School will provide reasonable alternative means of accessing services for those pupils who will not be using an automated biometric recognition system.

B. Procedures on obtaining, storing and using biometric data (Pupils over 18 years old, Staff and wider community)

The School ensures that biometric data is collected with appropriate care and complies with the data protection principles as set out in the General Data Protection Regulations (UK GDPR) 2018.

Written consent will be obtained before the data is taken and used i.e., 'processed'. In no circumstances will biometric data be processed without written consent.

The School will provide reasonable alternative means of accessing services for those individuals who will not be using an automated biometric recognition system.

FREQUENTLY ASKED QUESTIONS

General

1. What is biometric data?

1.1 Biometric data means personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allows or confirms the unique identification of that natural person, such as fingerprint recognition.

1.2 The Information Commissioner considers all biometric information to be sensitive personal data as defined by the General Data Protection Regulations (UK GDPR) 2018; this means that it must be obtained, used and stored in accordance with that Regulation.

1.3 The Protection of Freedoms Act 2012 includes provisions which relate to the use of biometric data in schools and colleges when used as part of an automated biometric recognition system. These provisions are in addition to the requirements of the General Data Protection Regulations (UK GDPR) 2018.

2. What is an automated biometric recognition system?

2.1 An automated biometric recognition system uses technology which measures an individual's physical or behavioural characteristics by using equipment that operates 'automatically' (i.e. electronically). Information from the individual is automatically compared with biometric information stored in the system to see if there is a match in order to recognise or identify the individual.

2.2 Biometric recognition systems can use many kinds of physical or behavioural characteristics such as that listed in 1.1 above.

3. What does processing data mean?

'Processing' of biometric information includes obtaining, recording or holding the data or carrying out any operation or set of operations on the data including (but not limited to) disclosing it, deleting it, organising it or altering it. An automated biometric recognition system processes data when:

a) Recording biometric data, for example, taking measurements from a fingerprint via a fingerprint scanner;
b) Storing biometric information on a database system; or
c) Using that data as part of an electronic process, for example, by comparing it with biometric information stored on a database in order to identify or recognise individuals.

4. Does the School need to renew consent every year?

No. The original written consent is valid until such time as it is withdrawn. However, it can be overridden, at any time if another parent or the pupil objects to the processing (subject to the parent's objection being in writing). When the pupil leaves the School, their biometric data will be securely removed from the School's biometric recognition system.

5. Does the School need to notify and obtain consent if it were to introduce an additional, different type of automated biometric recognition system?

Yes, consent must be informed consent. If, for example, the School has obtained consent for using a fingerprint system and then later introduces a system for using iris or retina scanning, then it will have to meet the notification and consent requirements for the new system.

6. Can consent be withdrawn?

Consent can be withdrawn at any time which must be given in writing.

7. Can the School accept consent via email?

Yes – as long as the School is satisfied that the email contact details are accurate and the consent received is genuine.

8. Does the legislation cover other technologies such a palm and iris scanning?

Yes. The legislation covers all systems that record or use physical or behavioural characteristics for the purpose of identification. This includes systems which use palm, iris or face recognition, as well as fingerprints.

Frequently asked questions in relation to parental consent (pupils under 18 years old)

1. What if one parent is in disagreement with the other?

The School will be required to notify each parent of a pupil whose biometric information they wish to collect/use. If one parent objects in writing, then the School will not take or use that pupil's biometric data.

2. How will the pupil's right to object work in practice – must they do so in writing?

A pupil is not required to object in writing. An older pupil may be more able to say that they object to the processing of their biometric data. A younger pupil may show reluctance to take part in the physical process of giving the data in other ways. In either case the School will not collect or process the data.

3. Is the School required to ask/tell parents before introducing an automated biometric recognition system?

The School is not required by law to consult parents before installing an automated biometric recognition system. However, it is required to notify parents and secure consent from at least one parent before biometric data is obtained or used for the purposes of such a system.

4. Can consent be withdrawn by a parent?

Parents will be able to withdraw their consent, in writing, at any time. In addition, either parent will be able to object to the processing at any time but they must do so in writing.

5. When and how can a pupil object?

A pupil can object to the processing of their biometric data or refuse to take part at any stage – i.e. before the processing takes place or at any point after his or her biometric data has been obtained and is being used as part of a biometric recognition system. If a pupil objects, the School will not start to process his or her biometric data or, if they are already doing this, they will stop. The pupil does not have to object in writing.

6. Will consent given on entry to the School be valid until the pupil leaves the School?

Yes. Consent will be valid until the pupil leaves the School or until the pupil; reaches the age of 18 years old – subject to any subsequent objection to the processing of the biometric data by the pupil or a written objection from a parent. If any such objection is made, the biometric data will not be processed and the School will, in accordance with UK GDPR, remove it from the School's system by secure deletion.

7. Can the School notify parents and accept consent via email?

Yes – as long as the School is satisfied that the email contact details are accurate and the consent received is genuine.

8. Is parental notification or consent required if a pupil uses or accesses standard commercial sites or software which use face recognition technology?

The provisions in the Protection of Freedoms Act 2012 only cover processing by or on behalf of the School. If the School wishes to use such software for school work or any school business, then the requirement to notify parents and to obtain written consent will apply. However, if a pupil is using this software for their own personal purposes then the provisions do not apply, even if the software is accessed using School equipment.

9. Will the School need to seek consent again when a pupil turns 18 years of age?

Yes, the School will seek individual consent from pupils (in addition to parental consent which will have been obtained already) at the end of the Lower 6th year in anticipation of their turning 18 years of age the following year. The School will also monitor pupils turning 18 years of age in year groups other than the Upper Sixth and manage this on an individual basis. Where pupils aged 18 years of age of above take a different view to parents, the School would usually support the wishes of the pupil.

Appendix 2

Procedures on taking, storing and using images of children

This Procedure

This procedure is intended to provide guidance to staff and information to pupils and their parents, carers or guardians (referred to in this policy as "parents") about how images of pupils are normally used by Ryde School ("the school"). It also covers the school's approach to the use of cameras, video and filming equipment at school events and on school premises by parents and pupils themselves, and the media.

It applies alongside any individual parent or pupil consent forms provided, and the School's Terms and conditions / Parent Contract, where this includes terms around image use and marketing, and should be understood in the context of any other information the school may provide from time to time about a particular use of pupil images, including e.g. signage about the use of CCTV; and more general information about use of pupils' personal data in the School's Privacy Notice.

Safeguarding and online safety issues are more specifically dealt with under the School's relevant safeguarding policies.

Staff are additionally subject to their own training (in accordance with their role) and school policies in this area, including under the Staff Handbook.

General Principles of Image Use

Certain uses of images, including pupil images, are necessary for the ordinary running of the school for example, for administration, identification, educational and curricular purposes, and security. It may not be possible to object to such uses, although any concerns in this regard will be duly considered by the school.

Other uses are considered to be in the legitimate interests of the school and its community and unlikely to cause any negative impact on children. The School is entitled lawfully to process such images and take decisions about how to use them, although objections may be raised and the school will seek to accommodate any reasonable concerns. Examples are given in this policy.

We hope parents will feel able to support the school in using pupil images to celebrate the achievements of pupils, sporting and academic; to promote the work of the school; and for important administrative purposes such as identification and security. However, for any uses of images which might be considered more intrusive or unexpected – examples of which are set out further in this Policy – we will seek specific consent from parents and, as appropriate, pupils.

Parents who accept a place for their child at the school are invited to indicate that they agree to the school using images of him/her as set out in this policy, via the Consent for Use of Images form requested upon joining the School, and when moving between sections of the School. However, parents should be aware that certain uses of their child's images may continue to be necessary for example, administration, education or security or will be unavoidable (for example if they are included incidentally in CCTV or as a part of a whole-school photograph).

Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact Samantha Webb in writing via the email complianceofficer@rydeschool.net or fill in the form available within the parent portal. The School will respect the wishes of parents/carers (and indeed pupils themselves) wherever reasonably possible, and in accordance with this policy.

Parents should be aware that, from around 13 / secondary school age, the law recognises pupils' own rights to have a say in how their personal information is used – including images.

Use and Publication of Certain Pupil Images

In accordance with any consents, notices or objections as may be applicable from time to time, the school will use images of its pupils to keep the school community updated on the activities of the school, and for marketing and promotional purposes, including:

- on internal displays and notice boards within the school premises;
- as part of the school's email system and intranet, and in appropriate communications by whatever means with the school community (parents, pupils, staff, Governors and alumni);
- as part of school curricular activities for example for physical education or drama, or as a teaching aid, as part of official activities using school devices, tablets and applications;
- in printed material, such as school magazines and printed marketing material, including the school's prospectus;
- on the school's website and, where appropriate and in line with relevant policies, via the school's social media channels e.g. X (formerly) Twitter, Instagram and Facebook, including potentially in the form of live streamed video of school events ; and
- exceptionally, in the press and other external advertisements for the school.

The School's policy in respect of the above uses is as follows:

- **Legitimate interests** will be relied upon for any uses which are either essential (for example, security, administration and education) or which fall within a scope of reasonably expected uses. Reasonably expected uses include [via internal school or parent communications, on the intranet [or in other closed community groups], in printed material such as a school magazine or prospectus, or any uses whereby an individual child cannot reasonably be identified by someone outside the school community: for example, where their face cannot clearly be seen.

- The key effect of the school relying on legitimate interests is that parents and pupils may be entitled to object to such uses, although their specific consent will not be sought beforehand. Any objections will be duly considered by the school, but objections can be overridden by other factors: for example, uses which the school considers essential; or uses which create little or no risk of harm (including where children are not at risk of outside identification).

- **Consent** will be sought for all other external uses of pupil images online. In particular, where any intended use is more intrusive or unexpected – for example, if a child is the focus of the image and

their face can clearly be seen – the school will discuss the use with the pupil or parents (as appropriate) in advance and seek a specific, *ad hoc* consent.

The School will take reasonable steps following any objection or withdrawal of consent but may not be able to recall or destroy printed materials. Any particular concerns or vulnerabilities relating to a pupil or their family should be drawn to the school's attention in advance. The safeguarding and best interests of pupils will remain the school's priorities at all times.

Use of Pupil Images for Identification and Security

All pupils are photographed on entering the School (and throughout Prep) and thereafter, at intervals in the Senior School of Years 7, 9 and 12, for the purposes of internal identification. These photographs identify the pupil by name, year group, house and form/tutor group.

CCTV is in use on school premises for certain notified purposes, including security, and in certain cases is likely to capture images of pupils. Images captured on the school's CCTV system are used in accordance with the Privacy Notice and CCTV Policy and the location of cameras will be clearly notified, including by signage.

IF USING BIOMETRICS: If we do not have consent to use your child's image or other biometric information for security purposes, we will ensure that a viable work-around is made available. See appendix 1.

Use of Pupil Images by External Media

Where practicably possible, the school will always notify parents in advance when the media is expected to attend an event or school activity in which school pupils are participating, and will make every reasonable effort to ensure that any pupil whose parent or carer has refused permission for images of that pupil, or themselves, to be made in these circumstances are not photographed or filmed by the media, nor such images provided for media purposes.

The media may ask for the names of the relevant pupils to go alongside the images. It is not the School's policy to provide full or first names in this scenario, and these will only be provided where parents have been informed about the media's visit and either parent or pupil has specifically consented to the sharing of their name, for an appropriate and necessary purpose.

Security of Pupil Images

Professional photographers and the media are accompanied at all times by a member of staff when on school premises. The School uses only reputable professional photographers and makes every effort to ensure that any images of pupils are in suitable dress and held by such persons securely, responsibly and in accordance with the school's instructions.

The School takes appropriate technical and organisational security measures to ensure that images of pupils held by the school are kept securely on school systems, and protected from loss or misuse. The School will take reasonable steps to ensure that members of staff only have access to images of pupils held by the school where it is necessary for them to do so.

Any external processors of pupil images are engaged only for lawful purposes consistent with those set out in this policy, and subject to proper due diligence and contractual protections.

- All staff are given guidance on the School's Policy on Taking, Storing and Using Images of Pupils, and on the importance of ensuring that images of pupils are made and used responsibly, only for school purposes, and in accordance with school policies and the law.
- Pupils are also given mandatory and age-appropriate training on their own privacy online and with their peers, including image use and social media safety.
- The School is careful in our use of images and digital media but there is always a risk that content shared online may be copied, altered or shared by others outside the School's control. This includes the online misuse and manipulation of digital content for potentially unlawful purposes. The School has robust procedures in place to mitigate the risk of this happening but it cannot be completely eliminated.

Use of Cameras and Filming Equipment (including mobile phones and wearable technology) by Parents

Parents, guardians or close family members (hereafter, parents) are welcome to take photographs of (and where appropriate, film) their own children taking part in school events, subject to the following guidelines, which the school expects all parents to follow:

- When an event is held indoors, such as a play or a concert, parents should be mindful of the need to use their cameras and filming devices with consideration and courtesy for cast members or performers on stage and the comfort of others. Flash photography can disturb others in the audience, or even cause distress for those with medical conditions; the school therefore asks that it is not used at indoor events.
- Parents are asked not to take photographs of other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents.
- Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other pupils should not be made accessible to others online (for example on Facebook, Instagram or by text or WhatsApp), or published in any other way.
- Surreptitious filming using personal devices of any sort is never permissible.
- Parents are reminded that copyright issues may prevent the school from permitting the filming or recording of some plays and concerts. The school will always print a reminder in the programme of events where issues of copyright apply.
- Parents may not film or take photographs in changing rooms or backstage during school productions, nor in any other circumstances in which photography or filming may embarrass or upset pupils, by reference to their dress or activity or any other factor.

The School reserves the right to refuse or withdraw permission to film or take photographs, at a specific event or more generally, either for all attendees/parents (e.g. where a safeguarding risk to an individual child has been identified) or from any individual parent who does not follow these guidelines, or is otherwise reasonably felt to be making inappropriate images.

The School sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case physical or digital copies may be made available to parents for purchase.

Parents of pupils taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.

Use of Cameras and Filming Equipment by Pupils

- All pupils are encouraged to look after each other, and to report any concerns about the misuse of technology, or any worrying issues to a member of the pastoral staff.
- The use of cameras or filming equipment (including on mobile phones or other forms of smart / wearable technology) is not allowed in toilets, washing or changing areas, nor should photography or filming equipment be used by pupils in a manner that may offend or cause upset.
- The misuse of images, cameras or filming equipment in a way that breaches this Policy, or the school's Anti-Bullying Policy, Data Protection Policy, IT Acceptable Use Policy for Pupils, Child Protection and Safeguarding Policy, Behaviour Policy or the School Rules is always taken seriously, and may be the subject of disciplinary procedures or dealt with under the relevant safeguarding policy as appropriate.

Awareness of other schools' policies and procedures

- We are not responsible for other schools' use of images policies – eg at sporting fixtures. Wherever practical, however, steps are taken with visiting schools and at away fixtures / events to check any arrangements they have regarding pupil images and video streaming and that any policies in this area are broadly aligned with our own and/or are notified to participating parents and pupils as applicable.

Retention of Images

- The School will retain images in accordance with national guidelines