



# **S06 – DATA PROTECTION POLICY & PRIVACY NOTICE**

**Approved: Full Governing Body**

**Approved Date: July 2025**

**Next Review Date: July 2026 by F & GP Committee with recommendation to Full Governing Body**



## **GENERAL**

Data in relation to individuals who interact with Westminster Abbey Choir School may be processed either within the School itself, within other departments of Westminster Abbey, or with approved third-party sub-processors/ partners.

The Choir School holds data in accordance with Westminster Abbey's Data Protection, Privacy & GDPR Policies. The Abbey's Data Protection Officer (DPO) is Sophia Kennedy; in relation to data held within the School, the DPO is assisted by the School's Bursar. Personal data regarding pupils and their parents and guardians will be processed as part of our operations in accordance with the above policies.

In addition, more detailed guidance as to how these policies will be enacted is to be found in the Privacy Notice that is posted on the Choir School's website and communicated to prospective parents & staff when they first interact with the Choir School. A copy of this Privacy Notice is recorded below.

## **PRIVACY NOTICE**

### **WHAT THIS PRIVACY NOTICE IS FOR**

This notice is intended to provide information about how the school will use (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 notice as "parents").

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. 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;
- the school's policy on taking, storing and using images of children;
- the Abbey's CCTV policy;
- the school's Safeguarding, Pupil Welfare, First Aid & Medical Care, or Health and Safety Policies, including as to how concerns or incidents are recorded; and



- the School's IT policies, including the Abbey's Social Media policy, e-Safety policy, Staff Code of Conduct and cookie policy.

Anyone who works for, or acts on behalf of, the school (including staff, volunteers, governors and service providers) should also be aware of and comply with this Privacy Notice.

## **RESPONSIBILITY FOR DATA PROTECTION**

The Dean and Chapter have appointed Sophia Kennedy, as Data Protection Officer (DPO): she is responsible for ensuring that all personal data are processed in compliance with the principles of the relevant legislation ("Data Protection Law" – see below), which are designed to ensure that all data are

- processed lawfully, fairly and in a transparent manner
- collected for specified, explicit and legitimate purposes
- adequate, relevant and limited to what is necessary
- accurate, where necessary, kept up to date
- retained only for as long as necessary
- processed in an appropriate manner to maintain integrity and confidentiality

## **DATA PROTECTION LAW**

The General Data Protection Regulation as incorporated into UK legislation, with some amendments, by [The Data Protection, Privacy and Electronic Communications \(Amendments etc\) \(EU Exit\) Regulations 2020](#)

The Data Protection Act 2018 and related legislation

The Privacy and Electronic Communications Regulations (PECR)

The Protection of Freedoms Act 2012 (biometrics and CCTV)

## **YOUR RIGHTS**

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the school, and in some cases ask for it to be erased or amended or have it transferred to others, 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 Abbey's DPO [dataprotectionteam@westminster-abbey.org](mailto:dataprotectionteam@westminster-abbey.org) and the School Business Manager [bursar@westminster-abbey.org](mailto:bursar@westminster-abbey.org).

The school will respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is one month in the case of subject access requests).



The school will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the school may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

#### Requests that cannot be fulfilled

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. 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).

The school is also not required to disclose any pupil examination scripts (or other information consisting solely of pupil test answers), provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the school itself for the purposes of the education, training 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 legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

#### Pupil requests

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.

#### 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.

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). 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 Data Protection Policy or 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 rare 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. 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 Behaviour, Discipline & Exclusions policy, Mobile Phone policy (pupils) and IT and school rules. Staff are under professional duties to do the same covered under the relevant staff policies.

### **WHY PERSONAL DATA NEEDS TO BE PROCESSED**

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 operation. Some of this activity the school will need to carry out in order to fulfil its legal rights, duties or obligations – including those 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":

- For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents);
- To provide education services, including musical education, physical training or spiritual development, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Maintaining relationships with the school community and alumni, including direct marketing or fundraising activity;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as in relation to tax or diversity);
- To enable relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past, current and prospective pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the school;
- To safeguard pupils' welfare and provide appropriate pastoral care;
- To monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's IT: acceptable use of the Internet/e-mail policy S18;
- To make use of photographic images of pupils in school publications, on the school website and (where appropriate) on the school's and Abbey's social media channels in accordance with the school's policy



- on taking, storing and using images of children;
- For security purposes, including CCTV in accordance with the Abbey's wider policies;
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for the school's purposes, including 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 it by law, including as regards safeguarding and employment, 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 medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, 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 provide educational services in the context of any special educational needs of a pupil;
- To provide spiritual education in the context of any religious beliefs;
- In connection with employment of its staff, for example DBS checks, welfare, union membership or pension plans;
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are Additional Educational Needs, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

## **DATA SECURITY AND ACCURACY**

The school will endeavour to ensure that all personal data held in relation to an individual are as up to date and accurate as possible. Individuals must please notify the school of any significant changes to important information, such as contact details, held about them. If in doubt as to who the relevant person is, you should in the first instance contact the school office.



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 below 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 policy and their duties under Data Protection Law and receive relevant training.

### **TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL**

Personal data cover both facts and opinions about individuals and may include (but are not limited to):

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use Westminster Abbey's car parking facilities);
- bank details and other financial information, e.g. about parents who pay fees to the school or who apply for financial assistance;
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- personnel files, including in connection with academics, employment or safeguarding;
- where appropriate, information about individuals' health and welfare, and 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 of pupils, staff (and occasionally other individuals) engaging in school activities, and images captured by Westminster Abbey's CCTV system (in accordance with the school's policy on taking, storing and using images of children S48).

Any reference to pupils includes current, past and prospective pupils.

### **HOW DATA ARE COLLECTED**

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); or collected from publicly available resources.

### **WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL SHARES THEM WITH**

Occasionally, the school will need to share personal information relating to its community with third parties, such as:

- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- government authorities (e.g. HMRC, DfE, police or the local authority);
- appropriate regulatory bodies. These may include but are not limited to
  - the Independent Schools Inspectorate, the Charity Commission or the Information Commissioner);
  - the School's catering provider; and
  - the Westminster Abbey Old Choristers' Association but only after seeking specific permission from parents.

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). Some data may be held in other departments of the Abbey where the processing of data occurs outside the curtilage of the school.

Particularly strict rules of access apply in the context of:

- medical records - held and accessed only by the school matron and appropriate staff, or otherwise in accordance with express consent; and
- pastoral or safeguarding files.

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

Staff, pupils and parents are reminded that the school is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO or police. For further information about this, please view the school's Safeguarding Policy.



The school records low level concerns in accordance with the Behaviour, Discipline and Exclusions policy and the Low Level Concern Policy.

Finally, in accordance with Data Protection Law, some of the school's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the school's specific directions.

The school will seek express permission from staff, parents and pupils where data will be collected by a third party in order to facilitate school events. Examples of such situations include, but are not limited to, the taking of individual, team or whole school photographs.

### **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 files is up to 7 years following departure from the school. Pupil files will typically be retained for 7 years after the year in which the pupil reaches the age of 18. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

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 Abbey Head of IT (details above) or the School Business Manager [bursar@westminster-abbey.org](mailto:bursar@westminster-abbey.org) 020 7654 4949.

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**

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



the purpose of establishing and maintaining relationships with the school and the wider Abbey community.

Should you wish to limit or object to any such use, or would like further information about it, please contact the School Business Manager in writing ([bursar@westminster-abbey.org](mailto:bursar@westminster-abbey.org)). You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the school is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

### **THIS POLICY AND PRIVACY NOTICE**

The school will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly.

### **QUERIES AND COMPLAINTS**

Any comments or queries on this policy should be directed in the first instance to the School Business Manager using the following contact details:

[bursar@westminster-abbey.org](mailto:bursar@westminster-abbey.org)

Westminster Abbey Choir School  
Dean's Yard  
London  
SW1P 3NY  
020 7222 6151

If an individual believes that the school has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the school complaints procedure and should also notify the Bursar. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the school before involving the regulator.