



**Queen's College, London &
Queen's College Preparatory School**

Pupil Privacy Notice

Due for review Summer Term 2025

Introduction

This notice is to help you understand **how** and **why** we collect your personal data and **what** we do with that information. It also explains the decisions that you can make about your personal data. If you need any help understanding this notice, speak with an adult such as your parents or form tutor.

It applies to all pupils who are attending, have attended or will be attending Queen's College, London ("Queen's"), which includes Queen's College ("the College") in Harley Street and Queen's College Preparatory School ("QCPS") in Portland Place. Queen's is the controller of your personal data, this means that it is the organisation with overall responsibility for handling your personal data and complying with the law.

The Bursar is the person in charge of making sure that Queen's complies with data protection law. You can speak to the Bursar at any time by:

- Contacting them directly via: bursar@qcl.org.uk or the school office
- Asking your form tutor for help
- Asking your parents for help

What personal data we collect about you

Personal data is information that relates to you and can be used to identify you. This includes information such as your name, date of birth and address as well as things like exam results, medical details, unique pupil number and behaviour records. It also includes more sensitive information such as your religion or ethnic group where you choose to share it with us for the purposes of equal opportunities monitoring. CCTV, photos and video recordings of you are also personal data.

Where your personal data comes from

Some of the personal data we process comes directly from you, for example work you produce or information you give to your teachers. We also receive your personal data from your family (for example, within admissions forms completed by you and your parents), members of our staff (such as your teachers or our reception staff), and your old school(s). Sometimes, we may receive your personal data from other organisations such as social services, the police, your doctor, and the Department for Education (DfE) (part of the Government that looks after schools and education).

The law says that we must collect certain information from you and/or your parents in order to provide you with an education. If we do not receive this information, we may not be able to provide you with a place at the College or QCPS.

How and why does Queen's collect and use your personal data?

Queen's' primary reason for using your personal data is to provide you with an education. Queen's will also use your personal data to safeguard and promote your welfare and the welfare of others (for example, so that we can look after you if you are hurt). We set out below examples of the different ways in which we use personal data:

1. We will use information about you during the admissions process e.g. when marking entrance exams at the College or QCPS, and learning more about you from your parents before you join either school. We may let your old school know if you have been offered a place.
2. We use CCTV to make sure that both school sites are safe. CCTV is not used in private areas such as changing rooms.
3. We will be told if you receive free school meals so that we can provide these.
4. We record your attendance and if you have time away from school we record the reason(s) why.
5. We will need to report some of your information to the government (e.g. the Department for Education). We will need to tell the local authority that you attend Queen's or let them know if we have any concerns about your welfare.
6. We are legally required to provide the Department for Education with certain information about you and your classmates. Some of this information will be stored on the National Pupil Database. Organisations can request information from the National Pupil Database which includes information about you. But they are only allowed to do this for limited purposes and they must be very careful about how they use your information. More information can be found here:

<https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>
7. We will need information about any court orders or criminal matters which relate to you. This is so that we can safeguard your welfare and wellbeing and the other pupils at Queen's.
8. If you are from another country we have to make sure that you have the right to study in the UK.
9. If someone makes a complaint about how Queen's has behaved we may need to use your information to deal with this appropriately. For example, if your parents complain that we have not looked after you properly.
10. We will monitor your use of email, the internet and mobile electronic devices e.g. iPads. This monitoring is sometimes carried out using computer software. In certain circumstances we will look at the content of your communications (e.g. emails and text messages). We monitor and look at your use of technology (e.g. your use of your phone) to check that you and your classmates are not at risk of harm or for other good reasons. If you would like more information about this you can read The Acceptable Use of Technology Policy or speak to your form tutor.
11. We may use photographs or videos of you for Queen's' websites, social media sites or prospectus to show prospective pupils what we do here and to advertise the College and QCPS. We may continue to use these photographs and videos after you have left Queen's.
12. Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.

If you have concerns about us using photographs or videos of you please speak to your form tutor.

13. We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing.
14. We will keep details of your address when you leave so we can send you the alumnae magazine "Queen's Today" and to find out how you are getting on. We may also pass your details onto the alumnae organisation. Further information on the alumnae association can be found here

<http://www.qcl.org.uk/alumnae/alumnae-welcome.php>
15. Queen's must make sure that our computer network is working well and is secure. This may involve information about you, for example, our anti-virus software might scan files containing information about you.

Some types of personal data are given extra protection in the law because it is particularly sensitive – these are called "special categories of personal data" and "personal data relating to criminal offences and convictions" (criminal offence data). The special categories of personal data are: race / ethnic origin; political opinions; religious beliefs; trade union membership; genetic information; biometric information (if it is used to identify you); health information; and information about someone's sex life or sexual orientation. Some examples of how we may use this type of information include:

1. Keeping records of any allergies or health issues you suffer from, to help us look after you.
2. We will need to tell your teachers if you have special educational needs or need extra help with some tasks.
3. Where appropriate, Queen's will have information about your religious beliefs and practices. For example, if you do not eat certain foods or need space to pray during the school day.
4. We ask for pupil's ethnicity to help analyse the impact of our policies and procedures on all pupils.

Who we share your personal data with

We will never share your information with anyone outside the school without your consent unless the law says we can or should. Examples of who we may need to share your personal data with include:

1. Your family and people who look after you.
2. We may need to share information about you (e.g. about your health and wellbeing) with the school Nurse, and in some circumstances with the Counsellor.
3. Sometimes the government will ask us to provide information as part of our reporting requirements. We may be required to provide information about you to UK Visas and Immigration who are part of the government.

4. Depending on where you will go when you leave us we will provide your information to other schools, colleges and universities or potential employers. For example, we will share information about your exam results and provide references.
5. We may pass on information to your next school which they need to look after you, for example, information about any concerns we have had about your welfare.
6. When you take public examinations (e.g. GCSEs) we will need to share information about you with examination boards. For example, if you require extra time in your exams.
7. We may need to share information about you with the Health and Safety Executive (a government organisation) if there is a health and safety issue at Queen's.
8. Queen's is a charity; this means that we may need to share your information with the Charity Commission, which checks how we are behaving as a charity.
9. The Learning Records Service (which is part of the government) will give us your unique learning number.
10. Both the College and QCPS are sometimes inspected to make sure that we are continuing to be a good school. We will have to make your information available to the inspectors to help them to carry out their job.
11. We may need to share information about you with the police or our legal advisers if something goes wrong or to help with an enquiry. For example, if one of your classmates is injured at school or if there is a burglary.
12. We may use consultants, experts and other advisors to assist Queen's College, London in fulfilling its obligations and to help run Queen's properly. We will share your information with them if this is relevant to their work.
13. If you have misbehaved in a serious way, and the police have become involved, we will need to share information with the police.
14. We will share some information with our insurance company to make sure that we have the insurance cover that we need.
15. We may share your academic and (where fair) your behaviour records with your parents so they can support your schooling.
16. We sometimes use contractors to handle personal data on our behalf. For example, IT consultants (who might access information about you when checking the security of our IT network) and third party "cloud computing" services to store some information.

Our legal grounds for using your information

This section contains information about the legal grounds that we are relying on when handling your information as described above.

Legitimate interests

This means that Queen's College, London is using your information when this is necessary for

Queen's or someone else's legitimate interests.

We do not rely on this ground where the legitimate interests are not outweighed by the impact on your own interests and rights.

For example, Queen's relies on the following legitimate interests:

- Providing you with an education.
- Making sure that you are behaving properly.
- Complying with our agreement with your parents for you to be at the College or QCPS.
- Looking after you, your classmates and our staff (e.g. your teachers).
- Keeping Queen's buildings safe.
- Making sure that Queen's is well managed and that we protect Queen's reputation.
- Telling people about Queen's and what we do here e.g. we may use photographs of you in our prospectus, on our website or in our social media.
- Ensuring that all relevant legal obligations of Queen's are complied with (for example, in relation to inspections).
- Using your information in connection with legal disputes.
- Improving Queen's e.g. if we want to raise money to improve the facilities or buildings or to make sure that we are providing you and your classmates with a good schooling experience.

In addition your personal data may be processed for the legitimate interests of others. For example, we may use information about you when investigating a complaint made by one of your fellow pupils.

Legal obligation

Queen's College, London might need to use your information in order to comply with a legal obligation, for example to report a concern about your wellbeing to Children's Services. We will also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

Examples of where we rely on this legal ground include:

- Complying with laws requiring us to report certain information to the Department for Education.
- To safeguard and protect your welfare.
- If the courts order us to provide your information if you are involved in a court case.

Vital interests

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

Please note, where we are required by law (or a contract) to collect certain information about you, if you (or your parents) do not provide this information when we ask, we may not be able to meet our responsibilities under the law or meet our duties under the contract.

Queen's College, London must also comply with an additional condition where it processes special category personal data. Because this information is particularly sensitive, we need additional reasons to collect and use it. Our legal reasons for doing this include:

Substantial public interest

Queen's is allowed to use special categories of personal data where doing so is necessary for reasons of substantial public interest. For example, we may rely on this ground if we need to share information with social services to help protect pupils who are at risk.

Vital interests

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

Legal claims

We are allowed to use your information if this is necessary in relation to legal claims. For example, this allows us to share information with our legal advisors and insurers. This applies whenever sharing special category data is necessary in relation to legal claims.

Health or social care

Occasionally, we may need to use your personal data for health or social care purposes. For example, where it is necessary to share pupil personal data with health professional such as a speech and language therapist.

Public Health

Rarely, we may need to use your information where it is necessary for public health reasons. For example, where pupil information needs to be collected and used in connection with a public vaccination programme or in response to a pandemic such as the COVID-19 pandemic. Where this happens, the data is handled by a health professional such as a nurse or someone who the law says must keep your information confidential.

Criminal offence information

In exceptional circumstances, we may use information about criminal convictions or offences. We will only do this where the law allows us to. This will usually be where such processing is necessary to carry out our obligations and to look after our pupils.

Multiple legal grounds

The ground that we will rely on for a particular purpose may vary depending on the circumstances. For example, if we decide to tell the local authority something about a pupil because we are worried about their welfare, sometimes this will be because we have a legal obligation to do so but on other occasions we may tell the local authority because we are worried about the pupil even if we don't have a legal obligation to report something (in which case we would be relying on legitimate interests and substantial public interest).

Consent

Occasionally, we may ask for your consent to use your information. For example, taking photographs of you which may appear on social media or on our website. If we ask for your consent to use your personal data you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. Please speak to your form tutor if you would like to withdraw any consent that you have given.

Sending information to other countries

We may send your information to countries which do not have the same level of protection for personal data as there is in the UK. For example, we may store your information on cloud computer storage based overseas.

Where we do transfer your information outside the UK, we will ensure it is protected and handled in line with data protection law. For example, if we can we will only transfer your personal data to countries that provide the same or a higher level of protection as the UK. If we cannot do this, we will take steps to protect your personal data with one of the other measures available under the law (such as through contracts).

We can provide you with further details about the safeguards which we have in place outside of this privacy notice. If you have any questions about the safeguards that are in place please contact the Bursar.

For how long do we keep your information?

We only keep your information for as long as we need to in order to educate and look after you. We will keep some information after you have left the College or QCPS, for example, so that we can find out what happened if you make a complaint.

In exceptional circumstances we may keep your information for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

Please see our Information and Records Retention Policy for more detailed information. This can be found on our website here <http://www.qcl.org.uk/about-us/policies.php>.

What decisions can you make about your information?

You have the right to make various decisions about your information. Some of these are new rights whilst others build on your existing rights. Some of your rights are listed as follows:

- **Access:** you can also ask what information we hold about you and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra

information, such as why we use this information about you, where it came from and what types of people we have sent it to.

- **Rectification:** if information is incorrect you can ask us to correct it.
- **Erasure:** you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your information to you or to a third party in a format that can be read by computer in certain circumstances.
- **Restriction:** our use of information about you may be restricted to simply storing it in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.
- **Objection:** you may object to us using your information where:
 - we are using it for direct marketing purposes (e.g. to send you Queen's magazine "Queen's Today");
 - we are relying on either the legitimate interests or performance of a task carried out in the public interest legal ground to use it - please see the section "Our legal grounds for using your information" above;
 - we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of your class for historical reasons.

Your form tutor can give you more information about your data protection rights.

Further information and guidance

If you are not happy about the way we have acted when using your personal data, you can contact the Bursar to make a complaint using the contact information at the top of this notice. If you are still not happy or if we are unable to help, you have the right to complain to the Information Commissioner's Office (ICO). The ICO can be contacted via: <https://ico.org.uk/make-a-complaint/>.

Changes to this Privacy Notice

This privacy notice was published on 1st September 2023. This privacy notice may be changed from time to time. When we do this, we will publish the new privacy notice on our website or, if the changes are significant, we will contact you and/or your parents directly.