



## **PRIVACY POLICY**

**Review date:** April 2026

**Next review date:** April 2027

**Staff responsible:** Alexander Richardson (Bursar)

**Chair of Directors:** Ben Whitchurch

This policy should be read in conjunction with the following St George's policies:

- Safeguarding Policy
- Child Protection Policy
- Data Protection Policy
- Admissions Policy
- Complaints Policy
- Equality and Diversity Policy
- SEND Policy
- Medical and First Aid Policy
- ICT Acceptable Use Policy
- Online Safety Policy
- St George's Privacy Notice

### **Rights Respecting School Statement**

Our school's vision and values have, at their heart, the importance of treating each other as we would want to be treated ourselves. This is one of the reasons why the work of UNCRC and Rights Respecting Schools is so significant to us. We are committed to respecting, upholding and promoting the rights of every child. This policy links specifically to the following articles:

- **Article 2:** No discrimination
- **Article 3:** Best interest of the child
- **Article 4:** Making rights real
- **Article 8:** Identity

### **Purpose**

St George's Preparatory School ("the School") is committed to protecting the privacy and security of personal data relating to pupils, parents, carers, staff, contractors, volunteers, governors and members of the wider School community.

This Privacy Policy explains how privacy and data protection are embedded across the School's governance, decision-making and operational practices, and how the School meets its obligations under the Data Protection (Jersey) Law 2018.

This policy sets out the framework and principles governing how personal data is handled. Detailed information for individuals about specific data processing activities is provided in the School's Privacy Notices.



## **Data controller and accountability**

St George's Preparatory School Limited is a Data Controller for the purposes of the Data Protection (Jersey) Law 2018. The School determines how and why personal data is processed.

The School is registered with the Jersey Office of the Information Commissioner (JOIC) and is accountable for demonstrating compliance with data protection law.

## **Responsibility for data protection**

Overall responsibility for data protection compliance rests with the Board of Directors, with operational responsibility delegated to the Headteacher.

The School has appointed a Data Protection Officer (DPO) to:

- oversee compliance with this policy and associated notices
- advise the School on its legal obligations
- act as a contact point for data subjects and the JOIC

Contact details for the DPO are provided in the school's Privacy Notice.

## **The school's approach to data protection**

When processing personal data, St George's adheres to the principles that personal data must be:

- processed lawfully, fairly and transparently
- collected for specified, explicit and legitimate purposes
- adequate, relevant and limited to what is necessary
- accurate and kept up to date
- retained only for as long as necessary
- processed securely and confidentially

These principles underpin all School policies, procedures and staff training relating to personal data.

## **Legal bases for processing**

The School processes personal data only where there is a lawful basis to do so, including:

- performance of a contract
- compliance with legal obligations
- safeguarding and other vital interests
- performance of tasks carried out in the public interest
- the School's legitimate interests, where these are not overridden by individual rights
- consent, where required

The specific legal bases relied upon for particular uses of data are set out in the School's Privacy Notice.



## **Special category and criminal offence data**

The School recognises that certain categories of personal data require enhanced protection, including health information, SEN data, safeguarding records and criminal offence information.

Such data is processed only where permitted by law and subject to heightened safeguards, access controls and confidentiality arrangements, as set out in relevant School policies and Privacy Notice.

## **Information sharing and processors**

The School may share personal data with third parties where there is a lawful reason to do so, including regulators, local authorities, professional advisers and service providers.

Where external processors are used, the School ensures appropriate contractual assurances are in place to protect personal data and to ensure it is processed only in accordance with the School's instructions.

Details of key processors and data sharing arrangements are provided in the School's Privacy Notice.

## **Data retention**

St George's retains personal data only for as long as it is necessary and lawful to do so, having regard to statutory requirements, guidance and operational needs.

The School maintains a Data Retention Schedule, available on request from the DPO.

## **Individual rights**

Individuals have rights under the Data Protection (Jersey) Law 2018, including rights of access, rectification, erasure, restriction, objection and data portability.

These rights, and the process for exercising them, are explained in the relevant Privacy Notices.

## **Training, awareness and compliance**

All staff are expected to comply with this Privacy Policy and related procedures. Appropriate training is provided to ensure that staff understand their responsibilities when handling personal data.

Breaches of this policy may result in disciplinary action and, where appropriate, notification to the JOIC.

## **Review**

This policy will be reviewed annually.