

# Shrewsbury School Trading Company Limited

## PRIVACY NOTICE

### Who we are

For the purposes of Data protection legislation, the 'Data Controller' is Shrewsbury School Trading Company Limited, The Schools, Shrewsbury, SY3 7BA. Company registration 05580019. In this document "the Company" refers to Shrewsbury School Trading Company Limited. Our data protection registration number is **ZA511020**.

The following organisations have separate privacy notices.

- The parent organisation - Shrewsbury School **Z5306330**
- Shrewsbury School Foundation, The Schools, SY3 7BA. [**ZA511032**]  
Registered Charity Number 528415
- Shrewsbury School Trading Company Limited,. [**ZA511020**]
- Shrewsbury School Enterprises Limited, The Schools, Shrewsbury, SY3 7BA.  
Company registration 04535585. [**ZA511016**]

### What this policy is for

This policy is intended to provide information about how the Company will process personal data about individuals including: its staff; its current, past and prospective students; and their parents, carers or guardians (referred to in this policy as "parents"), and other customers.

This information is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used. Staff, parents and students, and other customers are all encouraged to read this Privacy Notice and understand the SSTC's obligations to its entire community.

This **Privacy Notice** applies alongside any other information the Company 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 Company's other relevant terms and conditions and policies, including:

- any contract between the company (including Shrewsbury Summer School) and its customers;
- Where applicable Shrewsbury School's data policies (the parent organisation), including policies on taking, storing and using images of children; the parent organisation's (Shrewsbury School) policy on CCTV (Data Retention policy); the School's Data Security policy; SSTCL's Safeguarding and Child Protection Policy and the parent organisation (Shrewsbury School)'s Health & Safety Policy, including how concerns or incidents are recorded; and the parent organisation's IT policies, including its pupil and non-pupil Acceptable Use policies, Cyber Bullying policy, Social Media Policy.

Anyone who works for, or acts on behalf of, the Company (including staff and staff of the parent organisation, volunteers, and service providers) should be aware of and comply with this Privacy Notice, which also provides further information about how personal data about those individuals will be used.

## Responsibility for data protection

- The Company and associated bodies have appointed the Maylin Ware (SSTC Director) as **Privacy and Compliance Officer** who will deal with all your requests and enquiries concerning the school's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and data protection law.

Maylin Ware  
Director of Shrewsbury School Trading Company  
The Schools  
SY3 7BA

01743 280820  
[mware@shrewsbury.org.uk](mailto:mware@shrewsbury.org.uk)

## Why the company needs to process personal data

To carry out its ordinary duties to staff, pupils and parents, and other customers the Company may process a wide range of personal data about individuals (including current, past and prospective staff, students or parents and other customers) as part of its daily operation.

Some of this activity the Company 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 students.

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

The Company expects that the following uses may fall within that category of its (or its community's) "**legitimate interests**":

- For the purposes of student selection (and to confirm the identity of prospective students and their parents);
- To provide education services, including musical education, physical training (including swimming lessons) or spiritual development, career services, and extra-curricular activities to students, and monitoring students' progress and educational needs;
- Provision of commercial services such as operating summer schools, hosting holiday camps, provision of swimming lessons, the promotion of performing arts events, and the organisation of sporting competitions on the school site;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as diversity or gender pay gap analysis and taxation records);
- To enable relevant authorities to monitor the Company's performance and to intervene or assist with incidents as appropriate;
- To safeguard students' welfare and provide appropriate pastoral care;
- To monitor (as appropriate) use of the parent organisation (Shrewsbury School)'s IT and communications systems in accordance with Shrewsbury School's IT Acceptable Use Policy when in use by students accessing services provided by SSTC
- To make use of photographic images of students for use on the website and (where appropriate) on the Company's social media channels (in accordance with the parent Shrewsbury School's policy on taking, storing and using images of children);
- For security purposes, including CCTV in accordance with the parent Shrewsbury School's CCTV policy;

- Organise transport to/from the school site at start and end of courses; and
- Where otherwise reasonably necessary for the Company's purposes, including to obtain appropriate professional advice and insurance for the Company;
- Where appropriate, names and contact details of visitors to the school site, including pupils visiting from other schools or organisations for competitions.

In addition, the Company may need to process **special category personal data** (concerning health, ethnicity, religion, biometrics 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 may include:

- To safeguard students' 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 where it is in the individual's interests to do so: for example, for medical advice, social services, insurance purposes or to organisers of school trips;
- To provide educational services in the context of any special educational needs of a student;
- In connection with employment of its staff, for example DBS checks, welfare or pension plans;
- To run any of its systems that operate on biometric data, such as for security and other forms of pupil or staff identification; 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;

## **Types of personal data processed by the Company**

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);
- bank details and other financial information, eg about parents who pay fees to the Company and about staff for payroll purposes;
- records and information about student attainment during courses;
- where appropriate, information about individuals' health, and contact details for their next of kin; and
- images of students (and occasionally other individuals) engaging in educational camps and activities, and images captured by the parent School's CCTV system (in accordance with the school's policy on taking, storing and using images of children & the CCTV policy).

## **How the Company collects data**

The Company receives personal data from the individual directly (including, in the case of students, from their parents). This will be via a series of forms, in the ordinary course of interaction and communications such as letters, emails or written assessments.

Personal data may also be supplied by third parties, collected from publicly available resources or from previous schools/employers in the case of staff.

## **Who has access to personal data and who the Company shares it with**

Occasionally, the Company will need to share personal information relating to its community with third parties, such as professional advisers (lawyers and accountants) or relevant authorities (HMRC, police or the local authority). The Company may also share limited pupil details with selected third parties for the purposes of providing access to

academic resources, extra-curricular activities e.g. external outward bound providers, and limited contact information with transport companies or taxi firms where arranging transport on a parent or students' behalf.

Details of food allergies or other relevant information may be shared with third party caterers and other schools or companies where necessary to ensure safe delivery of catering or other services.

For the most part, personal data collected by the Company will remain within the Company or the parent school and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

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

Staff, students and parents are reminded that the parent 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 may 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 SSTCL's Safeguarding and Child Protection Policy. Where appropriate this may also apply to data held by the Company.

Finally, in accordance with data protection law, some of the Company'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.

## **How long we keep personal data**

The Company will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. If you have any specific queries about how this policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact Privacy and Compliance Manager (see contact details above). However, please bear in mind that the Company may have lawful and necessary reasons to hold on to some data.

Where relevant the Company will follow the parent school's policy on Data Retention is contained within Appendix C of the Shrewsbury School Data Policies document.

## **Your rights**

Individuals have various rights under data protection law to access and understand personal data about them held by the Company, and in some cases ask for it to be erased or amended or for the Company 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 Privacy and Compliance Manager.

The Company 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 one month in the case of requests for access to information. The Company will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, the Company may ask you to reconsider or charge a proportionate fee, but only where data protection law allows it.

You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal professional privilege.

## **Consent**

Where the Company 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 Company may 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, or services has been requested).

## **Whose rights**

The rights under data protection law belong to the individual to whom the data relates. However, the Company will often rely on parental consent to process personal data relating to students (if consent is required) unless, given the nature of the processing in question, and the student's age and understanding, it is more appropriate to rely on the student's consent.

In general, the School will assume that student's consent is not required for ordinary disclosure of their personal data to their parents, eg for the purposes of keeping parents informed about the student's activities, progress and behaviour, and in the interests of the student's welfare, unless, in the Company or parent school's opinion, there is a good reason to do otherwise.

However, where a student 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 Company may be under an obligation to maintain confidentiality unless, in the Company's opinion, there is a good reason to do otherwise; for example where the Company believes disclosure will be in the best interests of the student or other students, or if required by law.

## **Data accuracy and security**

The Company 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 please notify the Privacy and Compliance Officer 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): please see above for details of why the Company (or parent School) may need to process your data, of who you may contact if you disagree.

The Company will take appropriate technical and organisational steps to ensure the security of personal data about individuals. All staff will be made aware of this policy and their duties under data protection law and receive relevant training.

### **This policy**

The Company will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

### **Queries and Complaints**

Any comments or queries on this policy should be directed to the Privacy and Compliance Manager using the following contact details.

Maylin Ware  
Director of Shrewsbury School Trading Company  
The Schools  
SY3 7BA

01743 280820  
[mware@shrewsbury.org.uk](mailto:mware@shrewsbury.org.uk)

An individual 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 Company before involving the regulator.

**Owner:** M Ware SSTC  
November 2023