



Framlingham College Privacy Notice (Parents, pupils and alumni)

REVIEWER:	BURSAR
REVIEW DATE:	MAY 2026
NEXT REVIEW DATE:	AUGUST 2026

Who we are

Framlingham College ("the School"), which includes the Senior and Prep Schools, is aware of its obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 and is committed to processing your data securely and transparently. This privacy notice sets out, in line with GDPR, the types of data that we hold that relates to parents, pupils and alumni. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

This notice applies to prospective, current and former parents and pupils.

What this Privacy Notice is for

This policy is intended to provide information about how the School will use (or "process") personal data about: current, past and prospective pupils ("pupils"); their parents, carers or guardians (referred to as "parents").

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Parents, pupils and alumni 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 parents or pupils;
- the School's policy on taking, storing and using images of children;
- the School's CCTV and/or biometrics policy;
- the School's retention of records policy;
- the School's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and the School's usage of IT policies.

Responsibility for Data Protection

- The School is a Data Controller, meaning that it determines the processes to be used when using your personal data. The School's contact details are as follows: Framlingham College & Prep School, College Road, Framlingham, Suffolk, IP13 9EY.
- The School is registered with the Information Commissioner's Office (ICO) as a data controller.
- The School has a designated GDPR Administrator (Data Protection Lead), whose contact details can be obtained from the Bursar's Office, to ensure that all personal data is processed in compliance with this Privacy Notice and Data Protection Law, and to oversee requests and enquiries concerning the School's use of personal data.

Data Protection Principles

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way
- collect your data only for specified, explicit and legitimate purposes
- only use it in the way that we have told you about
- ensure it is correct and up to date
- keep your data for only as long as we need it
- process it in a way that ensures appropriate security against unauthorised or unlawful processing, accidental loss, destruction or damage

Why the School needs to process personal data

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

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.

Where we rely on legitimate interests, we have carried out balancing assessments to ensure that these do not override the rights and freedoms of individuals.

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, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;

- Maintaining relationships with alumni, the Society of Old Framlinghamians 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;
- 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 policies;
- To make use of photographic images of pupils in School publications, on the School website and (where appropriate) on the School'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 School's CCTV policy;
- 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, biometrics or sexual life) in accordance with rights or duties imposed on it by law, including as regards safeguarding, 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;
- To run any of its systems that operate on biometric data, such as for security and other forms of pupil identification (lockers, lunch etc.);
- As part of any School or external complaints, disciplinary or investigation process that involves such data, for example if there are SEN, 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.

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;
- vehicle details (about those who use the School's car parking facilities);

- bank details and other financial information, e.g. about parents who pay fees to the School;
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- 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 pupils and parents past and present; and
- images of pupils (and occasionally other individuals) engaging in School activities, including images captured by the School's CCTV system (see CCTV policy for further details)
- The School uses CCTV to maintain a safe and secure environment for pupils, staff and visitors. CCTV is operated in accordance with the UK Surveillance Camera Code of Practice. For further information, please see the School's CCTV Policy. Data Subject Access Requests relating to CCTV footage should be made to reception@framlinghamcollege.co.uk.

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); or collected from publicly available sources.

Who has access to the personal data and who the School shares it with

The School may receive requests from third parties to disclose personal data it holds about pupils, their parents or guardians. The School will not generally disclose information unless there is a lawful basis to do so, under UK GDPR (such as consent, legal obligation, or legitimate interests), or other applicable lawful grounds. However, the School does intend to disclose such data as is necessary to third parties for the following purposes:

- To give a confidential reference relating to a pupil to any educational institution which it is proposed that the pupil may attend.
- To give information relating to outstanding fees or payment history to any educational institution which it is proposed that the pupil may attend.
- To publish the results of public examinations or other achievements of pupils of the School.
- To disclose details of a pupil's medical condition where it is in the pupil's interests to do so, for example for medical advice, insurance purposes or to organisers of School trips.
- For fundraising, marketing or promotional purposes and to maintain relationships with pupils and parents of the School, including transferring information to the Society of Old Framlinghamians, FramSoc and Friends of Framlingham and any other association, society or club set up for the purpose of establishing or maintaining contact with pupils and parents or for fundraising, marketing or promotional purposes.

Where the School receives a disclosure request from a third party it will take reasonable steps to verify the identity of that third party before making any disclosure.

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

- professional advisers (e.g. lawyers, insurers);
- government authorities (e.g. DfE, police or the local authority); and
- appropriate regulatory bodies e.g. the Independent Schools Inspectorate, the Charity Commission, the Information Commissioner.

For the most part, personal data collected by the School will remain with the 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, which are held and accessed only by the School doctor and appropriate medical staff, or otherwise in accordance with express consent;
- pastoral or safeguarding files.

However, a certain amount of any SEN pupil's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

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 staff 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.

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.

- iSAMS (School database)
- My School Portal [MSP] (parent information portal)
- Patient Tracker (medical database)
- My Concern (Safeguarding details)
- GL Assessment (testing data)
- Access / ThankQ (alumni database)
- Examinations boards
- The Web Kitchen (School website provider)

How long we keep personal data

The School will retain personal data securely and only for as long as is necessary for a legitimate and lawful purpose, in accordance with the School's Records Retention Schedule.

Pupil records are typically retained for up to 7 years after a pupil leaves the School. However, certain records, including safeguarding and child protection files, incident reports, and welfare records, are

retained for significantly longer periods, and in some cases indefinitely, particularly where required to comply with safeguarding obligations and to support potential investigations into historic allegations.

A limited and proportionate amount of information may be retained for historical and archiving purposes. The School may also retain information to enable it to provide references for former pupils, particularly where these relate to roles involving safeguarding responsibilities.

Where you have requested that we no longer keep in touch with you, the School will retain a record of your preferences in order to ensure that your wishes are respected (sometimes referred to as a “suppression record”).

If you have any specific queries about how the School’s retention policy is applied or wish to request that personal data you believe is no longer relevant is considered for erasure, please contact the GDPR Administrator (Data Protection Lead). Please note, however, that the School may have lawful and necessary reasons to retain certain personal data even following such a request.

Keeping in touch and supporting the School

The School 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 Society of Old Framlinghamians, FramSoc, Friends of Framlingham;
- Contact parents and/or alumni by post and email in order to promote and raise funds for the School;
- Collect information from publicly available sources about parents’ and former pupils’ occupation and activities, in order to offer more targeted invitations to participate in relevant opportunities that may arise, for example work experience for pupils or School hosted careers or business seminars;
- Should you wish to limit or object to any such use, or would like further information about them, please contact the GDPR Administrator (Data Protection Lead) in writing. 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

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 please notify the GDPR Administrator (Data Protection Lead) 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 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. Staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

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 far as is reasonably practicable.

Queries and Complaints

Any comments or queries on this policy should be directed to the GDPR Administrator (Data Protection Lead), Framlingham College, College Road, Framlingham, Suffolk, IP13 9EY, Tel: 01728 723789.

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 GDPR Administrator (Data Protection Lead). 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.