

METHODIST COLLEGE BELFAST

PRIVACY NOTICE

For Pupils & Parents/Families/Carers/Legal Guardians/Staff/Volunteers/Donors/ Alumni/Suppliers and Contractors/Governors/Visitors/Other Supporters of the Work of the College

Introduction and About this Notice

This Privacy Notice sets out how Methodist College including Downey House and Fullerton House Preparatory Departments and other various parts of the College (collectively referred to as “the College”, “We”, “Us”, “Our”) use your data. We are committed to a Policy which protects the rights and privacy of individuals in accordance with the Data Protection Act 2018, the General Data Protection Regulation (EU) 2016/679 and any legislation that, in respect of the United Kingdom, replaces, or enacts into United Kingdom domestic law, the General Data Protection Regulation (EU) 2016/679, the proposed Regulation on Privacy and Electronic communications or any law relating to data protection which determines how an individual’s personal data is processed and for what purposes (“Data Protection Law”).

This notice applies to current, past and prospective pupils & parents, families, carers, legal guardians, staff, volunteers, donors, alumni, suppliers and contractors, governors, visitors and supporters of the work of the College who are all encouraged to read this Privacy Notice and to understand the College’s obligations. The information in this notice is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used.

This Privacy Notice also applies in addition to the College’s other relevant notices and policies, including:

- any contract between the College and its staff or the parents of pupils;
- the College’s policy on taking, storing and using images;
- the College’s policy on the use of CCTV;
- the College’s Records Management Policy and Disposal of Records Schedule;
- the College’s safeguarding and pastoral policies;
- the College’s Health and Safety policy, including how concerns or incidents are recorded;
- the College’s IT policies.

Methodist College is a Data Controller for the purposes of Data Protection Law. This means that we are responsible for deciding how we hold and use the personal data which we collect. We are required under Data Protection Law to notify you of the information contained in this privacy notice.

We collect and use pupil data under the Education Act (Northern Ireland) 2014 and other legislation. You may find the specific legislation at <https://www.educationni.gov.uk/department-education-legislation>.

The majority of data you provide to us is data which you are legally obliged to provide but some data is provided to us on a voluntary basis. When collecting data from you we will inform you whether you are required to provide certain data to us or if you have a choice in this.

We may update this notice at any time but if we do so, we will inform you as soon as reasonably practicable.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you, so that you are aware of how and why we are using such data and what your rights are under the GDPR.

If you have any questions about this privacy notice or how we handle personal data, please contact the Principal who will deal with your query. The Principal can be contacted at: principal@methody.org

Principal
Methodist College
1 Malone Road
Belfast
BT9 6BY

Tel: 02890 205 202

Our Data Protection Officer is the Education Authority, and it monitors the school's data protection procedures to ensure they meet the standards and requirements of the GDPR. Please contact our compliance with Data Protection Law. You may raise any queries about our Data Protection Practices with The Education Authority, DPO, 40 Academy Street, Belfast, BT1 2NQ

Email: info@eani.org.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO's details are as follows:

The Information Commissioner's Office – Northern Ireland

3rd Floor
14 Cromac Place,
Belfast
BT7 2JB

Telephone: 028 9027 8757 / 0303 123 1114

Email: ni@ico.org.uk

Whose Data We Collect

We collect data relating to individuals who fall into one or more of the categories listed below. This list is not exhaustive and includes current, past and prospective:

- Pupils
- Parents, families, carers and legal guardians
- Staff
- Volunteers
- Donors
- Suppliers and contractors
- Visitors
- Supporters of the work of the College
- Governors of the Board

Data Protection Principles

We will process personal data in accordance with the following principles:

- Personal data must be processed fairly, lawfully and transparently;
- Personal data must be collected and processed only for specified, explicit and legitimate purposes;
- Personal data must be adequate, relevant and limited to what is necessary for the purposes for which it is processed;
- Personal data must be accurate and kept up to date. Any inaccurate data must be deleted or rectified without delay;
- Personal data must not be kept for longer than is necessary for the purposes for which it is processed;
- Personal data must be processed securely.

Lawful Basis for Processing Personal Data

In order to carry out its ordinary duties to staff, pupils, parents, families, carers and legal guardians the College may process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents, families, carers and legal guardians) as part of its daily operation. To do that, we must have a lawful basis (or bases) for that processing which will be as follows-

- **Public Interest** - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of Official Authority vested in the School;
- **Contract** - Processing is necessary for the performance of a contract to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract (for example contracted staff, parents, families, carers and legal guardians of pupils)
- **Legal Obligation** - Processing is necessary for compliance with a legal obligation;
- **Vital Interests** - Processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- **Legitimate Interests** - Processing is necessary for the purposes of the legitimate interests pursued by the Data Controller for by a third party (provided that legitimate interests will only be relied on as a ground for processing, where the processing falls outside the scope of the tasks performed by the College);
- **Consent** - The data subject has given consent to the processing of his/her data for one or more specific purposes. Where we rely on consent as a ground for processing, it must be as easy to withdraw as it is to give and therefore you may withdraw consent at any time by e-mailing principal@methody.org

Special Categories of Personal Data

In addition, the College may need to process **special categories personal data** (concerning health, ethnicity, religious or philosophical beliefs, trade union membership, genetic or biometric data or sexual life or orientation) or criminal records information (such as when carrying out Access NI checks) in accordance with rights or duties imposed on it by law, including safeguarding and employment, or from time to time by explicit consent where required. This may 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 the disclosure of medical details where it is in the individual's interests to do so. For example, this may include the processing of biometric security arrangements, medical advice, Social Services information, information for insurance purposes or information in respect of the organisation of College trips;
- To provide educational services in the context of any special educational needs of a pupil;

- In connection with employment of its staff, for example Access NI checks, welfare or pensions;
- For legal and regulatory purposes (for example child protection, diversity and equal opportunities monitoring and health and safety) and to comply with its legal obligations and duties of care.

Processing Special Category Data

In addition to one of the six lawful bases for processing outlined above, we will ensure that a condition for processing from the following list also applies:-

- The data subject has given explicit consent to the processing for one or more specified purposes;
- Processing is necessary for the purpose of carrying out the obligations or exercising specific rights of the controller, or of the data subject, in the field of employment and social security and social protection law;
- Processing is necessary to protect the vital interests on the data subject or of another natural person;
- Processing is carried out in the course of our legitimate activities;
- Processing relates to personal data manifestly made public by the data subject;
- Processing is necessary for the establishment, exercise or defence of legal claims;
- Processing is necessary for reasons of substantial public interest;
- Processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of an employee, medical diagnosis, the provision of health or social care treatment or the management of health or social care assistance and services;
- Processing is necessary for reasons of public interest in the area of public health;
- Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

What Personal Data do we collect, store and use about our pupils?

Personal data is information that identifies you and relates to you. We will collect, store and use the following categories of personal information about our pupils:

- Personal information (such as name, age, date of birth, photographs and unique pupil number)
- Contact information (such as address, emergency contact information and telephone number)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Assessment information (such as statutory assessment process, GCSE and post-16 qualifications and standardised tests provided by commercial companies)
- Exclusion and behavioural information
- CCTV footage captured in school and other information obtained through electronic means
- Non-sensitive characteristic data (such as free school meal eligibility)
- Special categories of data (such as ethnicity, language, country of birth, nationality, information regarding health, special educational needs, Biometric Date, allergies and disability).

Pupils' rights

The rights under Data Protection Law belong to the individual to whom the data relates. For the purposes of delivering our obligations under the College contract we will usually liaise with parents, families, carers and legal guardians and share pupil data with them relating to their child's progress and behaviour, school activities and the general wellbeing of their child.

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, we may be under an obligation to maintain confidentiality unless, in our opinion, there is a good reason to do otherwise; for example, where the school believes disclosure will be in the best interests of any pupil or is required by law.

What personal data do we collect, store and use about parents/families, carers/legal guardians?

We collect, store and use the following categories of personal information about parents/families/carers/legal guardians:-

- Personal information (such as name, age, date of birth and photographs);
- Contact information (such as address and telephone numbers);
- Financial information (such as bank account details);
- CCTV footage and other information obtained through electronic means.

How we might use your data to manage parents/ families/carers/legal guardians/pupils relationships with the College

- For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents);
- To provide education services, including musical education and physical training, career services, extra-curricular activities and monitoring pupils' progress and educational needs;
- To monitor and report on pupil progress;
- To monitor and manage pupils' absence;
- To enable relevant authorities to monitor the College'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 College;
- To safeguard pupils' welfare and provide appropriate pastoral care;
- For security purposes, including CCTV in accordance with the College's CCTV policy;
- To send updates from the College;
- To send invitations to events;
- To offer in-house medical services;
- To promote academic and extra-curricular achievements;
- To encourage parents to make donations for the ongoing work of the College.
- To collect legitimate fees from Parents/Families/Carers/Legal Guardians.
- To encourage pupils to become members of the Alumni associations.
- Where otherwise reasonably necessary for the College's purposes, including to obtain appropriate professional advice and insurance for the College;

What personal data do we collect, store and use about employees of the College

We will collect, store and use the following categories of personal information about school employees:-

- The personal information (such as name, employee or teacher number, notational insurance number, next of kin details and emergency contact information, photographs, bank account details and tax status information);
- Special categories of data including characteristics information (example gender, age, ethnic group, trade union membership, information relating to health and Access NI Enhanced Disclosure Application and Outcome);
- Recruitment information (example references information on a CV or application letter);
- Performance information (training records and professional memberships);
- Disciplinary and grievance information;
- Absence information;
- Qualifications;
- CCTV footage;
- Information in relation to use of our IT and Communication Systems.

How we might use your data if you are a prospective, existing, or former employee

- To manage the recruitment process;
- Processing Access NI application forms;
- Paying salaries, pension contributions, tax and any other lawful deductions from pay;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as equality or gender pay gap analysis; taxation records; pension records etc.);
- Managing leave, disciplinary actions; grievance procedures;
- To provide a safe and secure working environment.
- To monitor and report on employee progress;
- To monitor and manage employee absence;
- To give and receive information and references about current and prospective employees;
- For security purposes, including CCTV in accordance with the College's CCTV policy;
- To safeguard employees' welfare and provide appropriate pastoral care;
- Where otherwise reasonably necessary for the College's purposes, including to obtain appropriate professional advice and insurance for the College.
- To comply with the various Human Resources policies and procedures within the College.

What personal data do we collect, store and use about Governors of the Board?

We will collect store and use the following categories of personal information about Board Trustees:-

- Name, address and contact details of each member of the Board;
- Records in relation to appointments to the Board;
- Minutes of Board of Governors meetings and correspondence for the Board which may include references to particular individuals

How we might use your data if you are a Governor of the Board

- To keep a record of Board Appointments;
- Keeping minutes of Board meetings;
- Documenting decisions made by the Board.

How we might use your data if you are a Past Pupil; Member of a College Alumni Association; Member of a College Parent Teacher Association; Past, Current or Prospective Donor or Other Supporter of the Work of the College or Visitor.

The College has a Fundraising and Alumni Relations Office which deals with personal data relating to relating to alumni as well as past, current and potential donors, supporters and friends of the

College and visitors, including those who attend College events. This includes the processing and storage of this data.

The Fundraising and Alumni Relations Office processes the data outlined in this notice in pursuit of our legitimate interests in:

- Communicating with alumni; events attendees; past, current and potential donors, supporters and friends of the College and visitors;
- Providing information and services to alumni, friends and supporters;
- Furthering the College's educational charitable mission (including fundraising and securing the support of volunteers);
- Enabling the College to achieve its strategic and operational goals.

We may contact you by post, email, phone, text and/or social media. Where appropriate, the Fundraising and Alumni Relations Office will sometimes process your data on an alternative legal basis e.g. where you have given us the consent for us to do so. However, you can withdraw your consent at any time by emailing principal@methody.org.

Where your data comes from

Most of the data held by the Fundraising and Alumni Relations Office is obtained directly from our alumni, donors and friends. Core alumni data is carried over from their pupil record. We may receive information from colleges, schools or universities. Data is also collected directly from alumni such as when they update their details, return an alumni questionnaire or donation form, meet with one of our staff or attend an event. Some data may come from reliable public sources, for example, The Electoral Register.

How we might use your data

The Fundraising and Alumni Relations Office is responsible for maintaining and developing good relationships with past pupils and for raising funds towards capital projects, bursaries and other philanthropic initiatives to benefit the College and its pupils. To fundraise effectively, the College undertakes in-house research to prepare for meetings or to help identify individuals who may be able to give support. This information may come from any publicly available resources. From time to time, it may be necessary to engage the services of an external organisation to assist us in analysing our data and, in particular, where we would like to assess the feasibility of a planned campaign or project. We may use automated or manual processes such as wealth screening to analyse and segment our data. On occasion, we may use trusted third parties to carry out this analysis. The Fundraising and Alumni Relations Office and these third parties may augment any analysis conducted using information from trustworthy public sources such as Companies House. You will always have the right to opt out of any of this processing, and you can do so by emailing principal@methody.org. We may also use publically available sources to carry out due diligence on financial supporters and to meet money laundering or other regulations.

If you provide contact information, and unless you specify otherwise, we will assume this includes consent for us to use that data for the purposes listed above. If we lose touch with you, we may use publically available contact details to re-establish our connection and seek your permission to update your contact details.

Your information may be used to:

- Send relevant updates on the fundraising activities of the College;
- Send out newsletters;
- Send invitations to College events;
- Provide access to an online alumni portal;
- To keep a register and data base of pupils who have attended the College.
- Send appeals requesting donations;
- Process single and regular donations;

- Manage your previous donations to the College;
- Submit Gift Aid claims to HMRC;
- Prepare donor lists, Rolls of Honour and volunteer lists;
- Prepare research briefs for meetings or events;
- Source additional information using external resources;
- Provide information and services to alumni; past, current and potential donors, friends and supporters;
- Enable the College to achieve its strategic and operational goals.

What data do we collect about past pupils/alumni/member of College Parent Teacher Association/past current or prospective Donor

We will only store relevant data that allows us to fulfil our purposes outlined above. Data is generally collected directly from individuals when they enter into a contract with the College. Additional data is collected during an individual's relationship with the College and may be sourced from third parties for fundraising purposes.

General Information

Examples of the data we store include:

- Names, addresses (including email addresses), titles, gender, dates of birth, national insurance numbers, contact phone numbers, email addresses;
- Communication preferences;
- For past and present pupils, information about subjects studied at the College, positions of responsibility held, membership of clubs, societies and teams, post school destination;
- For parents and other donors, donation information and Gift Aid status;
- For parents and alumni, business and career details;
- For parents, donors, past pupils, members of a College alumni association, member of a College parent teacher association, other supporter of the work of the College or visitor, information about your areas of interest, including your volunteering or philanthropic giving to other organisations, information about your ability to support the College, such as your income if you have told us, as well as information on publically quoted remuneration.
- Event related information such as dietary or access requirements;
- Familial relationships;
- Bank details and other financial information, for example, in respect of parents seeking financial assistance; to process salaries or to collect fees or donations;
- Admissions and/or financial assistance applications, educational records, references, exam results, disciplinary records, safeguarding concerns, tutor and teacher notes;
- Information about individuals' health and contact details for their next of kin;
- Correspondence, attendance at meetings or events, meeting notes;
- References given or received by the College about pupils or prospective employees or
- Information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- Images of pupils (and occasionally other individuals) engaging in College activities and images captured by the College's CCTV system (in accordance with the School's policies on CCTV and Taking, Storing and Using Images of pupils);
- Car details, for example, about those who use our parking facilities;
- Information, such as CVs relating to past, present and prospective College personnel;
- Higher Education, profession, employment information;
- Affinity, engagement, giving capacity;

- Biometric data;
- Health/medical data;
- Criminal offence data;
- Attendance data;
- Salary records for employees.
- Health and safety and accident records.

Where your data is stored

Data is stored electronically and in hard copy format where necessary. There are strict access policies in place where only authorised personnel can access the information they require. Data storage locations may include:

- Centralised administration databases;
- C2k servers;
- Emails;
- Personal laptops, phones and iPads – may contain temporary notes that will be transferred to a central location;
- Filing cabinets;
- Third parties (See below for more information on data that is shared with third parties)

How we keep your data secure

All those who have access to, and are associated with the processing of, personal data are legally obliged to respect the confidentiality of any data they need to access in order to carry out their work and are obliged to process data in accordance with our internal policies outlined in this notice.

How long we keep your data for

As per our Records Management Policy and Disposal of Records Schedule we will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Sometimes we will keep personal data for historical reasons, for example, year group or sports team photographs, but you will always have a right to have this data destroyed.

Sharing data with third parties

We may need to share some of your data with a third-party provider to fulfil our purposes. When we share data with a third party we will always ensure that we have the necessary contracts in place to ensure the security of your data. We will only share special category data securely with a third party if it is a legal obligation or in order for us to provide onsite medical care. Examples of third parties we may share data with include:

- The new school/further educational establishment that a pupil attends after leaving us;
- The Department for Education;

- The Education Authority for Northern Ireland;
- The Education and Training Inspectorate;
- Northern Ireland council for Curriculum, Examinations and Assessments;
- The Board of Governors;
- General Teaching Council for Northern Ireland;
- Middletown Centre for Autism;
- Youth Council for Northern Ireland;
- Exceptional Circumstances Body;
- Department of Health and Health and Social Care Trusts;
- Police Service for Northern Ireland;
- C2k Management Information System;
- Examination Boards, for example, AQA, CCEA and Excel;
- Equality Commission;
- Labour Relations Agency;
- Commercial standardised test providers;
- Administration databases;
- Email and communication providers;
- Direct mail service providers;
- Educational service (including online) providers;
- HMRC;
- Local authorities;
- Pension providers;
- IT services including cloud storage providers;
- Appointed GP Practice;
- Consultancy organisations who may analyse our data;
- Professional advisors;
- Occupational health providers.

Transfer of personal data outside of the EEA

Restrictions on data leaving the EEA are in place to ensure that the level of data protection available to individuals within the EEA is not compromised. Some of our processes may require us to transfer data outside of the EEA. Generally, this occurs when we use a third-party processor who have servers based outside of the EEA. In these instances, we will ensure that the appropriate safeguards are in place to ensure an individual's data protection rights are met.

Consent, Rights and Preferences

Pupils

Whilst the majority of the personal data provided to the College for pupils is required for us to comply with our legal obligations, some of that data is provided on a voluntary basis through parental consent (namely, a parent's/carer's/legal guardian's express agreement). A pupil aged 13 or over is considered capable of giving consent themselves and will not require express agreement from a parent/carer/legal guardian. Where we need consent, for example, to use your child's image for display, promotional, instructional or other purposes related to the College or to contact you by text message or email, the school will provide the person with parental responsibility for a pupil or, if aged 13 or over, the pupil themselves, with a specific and clear notice which explains the reasons why the data is being collected and how it will be used. You should be aware if you do not consent to our collection of this type of data, this will not affect the standard of education we deliver to the pupil.

If we ask for your consent to use personal data, you can take back this consent at any time. Please email the Principal at principal@methody.org if you would like to withdraw any consent you have given,

Please be aware that we do not need to obtain parental consent if personal data is to be processed for the purposes of obtaining counselling services for the child.

Parents/Pupils/Families/Carers/Legal Guardians/Staff/Volunteers/Donors/ Alumni/Suppliers and Contractors/Visitors/Other Supporters of the Work of the College

The College hopes that its relationship with alumni, donors and supporters, including parents, carers and legal guardians to be lifelong. We will try to ensure that the data we hold for you is up to date, reasonable and not excessive. You always have the right to:

- be informed as to how we use your data (via this privacy notice);
- access or request a copy of the data we hold about you;
- update your data and/or manage your communications preferences by contacting the College;
- opt out of specific types of processing;
- ask us to remove your data from our records;
- withdraw consent, where it is used as a legal basis for processing.

If you are an alumnus of the College and exercise your right to be removed from our database, we will maintain some core data (name, date of birth, years of attendance) for archive purposes and to ensure we do not contact you inadvertently in the future. If you are a donor, we may also need to retain some financial records for the period of time required for statutory purposes (e.g. Gift Aid, anti-fraud and accounting matters).

Getting in touch

If you would like to get in touch to update your data, amend your preferences, change the way we process your data or for any general data protection enquiries, you can do so by contacting:

Email: principal@methody.org

Post: The Principal's Office, Methodist College, 1 Malone Road, Belfast, BT9 6BY

Phone: 02890205205

Complaints

If you feel your data has not been used in accordance with this Notice, please notify us by using the contact details outlined above. We do hope that any matters of complaint may be resolved between the complainant and the College, but, if you feel the need to take your complaint further details are given of the College's Data Protection Officer and Information Commissioner for NI at the beginning of this document.

How to find out if we are processing your data and request a copy of your data

You have the right to ask if your data is being processed by us and the right to ask for a copy of the data related to you that we are processing. A person with parental responsibility will generally be entitled to make a subject access request on behalf of a pupil, but the information in question is always considered to belong to the individual to whom the data relates. In Northern Ireland it is presumed that a child of 13 years or more has the capacity to exercise their rights under the Data Protection Law. A pupil of any age may ask a parent or other representative to make a subject access request on their behalf. Moreover (if

of sufficient maturity) their consent or authority may need to be sought by the parent making such a request. Requests for data that are excessive or repetitive will be subject to a fee.

How to have your data amended or deleted

You have the right to have inaccurate data rectified or completed (if it is incomplete), or have your data erased. Some exceptions may apply where we have another lawful reason to continue to process your data.

How to stop us using your data for certain purposes

You have the right to object to certain processes, such as fundraising activities, as long as it does not interfere with contractual or lawful obligations that we still may need to fulfil.

How to transfer data

You have the right to request the transfer of your personal data to you or to a third party. We will provide you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated data which you initially provided consent for us to use or where we used the data to perform a contract with you.

To act upon any of your rights outlined above please contact us using the details below:

principal@methody.org

Principal
Methodist College
1 Malone Road
Belfast
BT9 6BY

Tel: 02890 205 202

Requests may be made verbally or in writing. We will aim to respond to any such requests within one month of receipt. We may need to take steps to confirm the identity of the requestor depending on the method by which the request was made. Some requests (or part thereof) may be refused and, in such cases, we will respond outlining the reason for refusal.