

GSA PRIVACY NOTICE

WHO WE ARE

The Girls' Schools Association (GSA) represents the heads of many of the top performing day and boarding schools in the UK independent schools sector. We have a growing associate membership and are a member of the Independent Schools Council.

This privacy notice is intended to cover the activities of GSA and has been approved by our Council (the board of directors of the Girls' Schools Association). It sets out our rules on data protection and the legal conditions that must be satisfied in relation to the obtaining, handling, processing, storage, transportation and destruction of personal information.

The data held by GSA is primarily that of the member and their school but, within that, there are a number of school employees for whom data is held. This gives GSA two clear strands to its privacy policy: the business to business relationship with schools and the data control of the contact data for those employed by the member schools.

WHAT THIS PRIVACY NOTICE IS FOR

This policy is intended to provide information about how GSA will use (or "process") personal data about individuals including: its own staff; its current, past and prospective contacts within member schools; and within other organisations with whom it has commercial and other relationships.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff are all encouraged to read this Privacy Notice and understand the GSA obligations to its entire membership.

This **Privacy Notice** applies alongside any other information GSA may provide about a particular use of personal data, for example when collecting data online or in paper form.

This **Privacy Notice** also applies in addition to the Association's other relevant terms and conditions and policies, including:

- any contract between GSA and its staff;
- the Association's policy on taking, storing and using images;
- the Association's retention of records policy;
- the Association's health and safety policies, including as to how concerns or incidents are recorded; and
- the Association's IT policies, including its Acceptable Use policy, eSafety policy, WiFi policy, Remote Working policy and Bring Your Own Device policy.

Anyone who works for, or acts on behalf of, GSA (including staff, volunteers, Board Members and service providers) should also be aware of and comply with this Privacy Notice and the Association's data protection policy for staff, which also provides further information about how personal data about those individuals will be used.

RESPONSIBILITY FOR DATA PROTECTION

GSA has appointed the GSA Membership Manager as the Data Compliance Manager, who will deal with all requests and enquiries concerning the Association'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.

Contact details for the **Data Compliance Manager** are Mrs Jannette Davison, 01162081183, email jannettedavison@gsa.uk.com

WHY GSA NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to staff, member schools, and those individuals used as contacts within the schools, GSA needs to process a wide range of personal data about individuals (including current, past and prospective staff) as part of its daily operation.

Some of this activity GSA will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with its staff, or member schools.

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.

GSA expects that the following uses will fall within that category of its "**legitimate interests**":

- To provide member services, including professional development, training, advice and guidance, and monitoring schools' progress and needs;
- Maintaining relationships with emeritus and GSA community, including direct marketing;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
- To enable relevant authorities to monitor the Association's performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past, current and prospective staff.
- To monitor (as appropriate) use of the Association's IT and communications systems in accordance with the school's IT: acceptable use policy;
- To make use of photographic images, on the GSA website, by sharing with external media, 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;
- To carry out or cooperate with any internal or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for the Association's purposes, including to obtain appropriate professional advice and insurance for the Association.

In addition, GSA will on occasion need to process **special category personal data** (concerning health, ethnicity, religion, 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 safeguarding and employment, or from time to time by explicit consent where required. These reasons will include:

- In connection with employment of its staff, for example DBS checks, welfare, union membership or pension plans;
- As part of any Association or external complaints, disciplinary or investigation process that involves such data; or
- For legal and regulatory purposes (for example diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

TYPES OF PERSONAL DATA PROCESSED BY THE ASSOCIATION

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- bank details and other financial information;
- personnel files;
- where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- references given or received by GSA about employees, and relevant information provided by previous employers;
- correspondence with and concerning staff, past and present; and
- images of individuals engaging in Association activities.

HOW GSA COLLECTS DATA

Generally, GSA receives personal data from the individual directly. This may be via a form, or simply in the ordinary course of interaction or communication.

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 resources.

WHO HAS ACCESS TO PERSONAL DATA AND WHO GSA SHARES IT WITH

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

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

For the most part, personal data collected by GSA will remain within the Association and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis).

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.

HOW LONG WE KEEP PERSONAL DATA

GSA will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary staff personnel files is up to 7 years following departure from the Association.

If you have any specific queries about how our retention policy is applied or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact **The Data Compliance Manager**. However, please bear in mind that GSA will often have lawful and necessary reasons to hold on to some personal data even following such a request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact to fulfil your wishes (called a "suppression record").

YOUR RIGHTS

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the Association, and in some cases ask for it to be erased or amended or have it transferred to others, or for GSA 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 Data Compliance Manager.

GSA will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits.

GSA will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, GSA may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

- Requests that cannot be fulfilled

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals or information which is subject to legal privilege (for example legal advice given to or sought by the Association, or documents prepared in connection with a legal action).

You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

- Consent

Where GSA is relying on consent as a means to process personal data, any person may withdraw this consent at any time. Examples where we do rely on consent include certain types of uses of images. Please be aware however that GSA may not be relying on consent but 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 contract, or because a purchase of goods, services or membership of an organisation has been requested).

- Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates.

DATA ACCURACY AND SECURITY

GSA 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 Membership Manager 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 GSA may need to process your data, and who you may contact if you disagree.

GSA 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 Association systems. All staff and Council members will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

THIS POLICY

GSA will update this Privacy Notice from time to time. You should check the GSA website from time to time to ensure that you are happy with any changes. This policy is effective from 25 May 2018. 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 Data Compliance Manager using the following contact details:

Mrs Jannette Davison, 0116 2081183, email jannettedavison@gsa.uk.com

If an individual believes that GSA has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise GSA complaints/grievance procedure and should also notify the Data Compliance Manager. 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 GSA before involving the regulator.

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