

Document Owner and Approval

St James School is the owner of this document and is responsible for ensuring that this policy document is reviewed in line with School's policy review schedule.

Signature:

Date:

Change History Record

Version	Description of Change	Date of Policy Release by Judicium
1	Initial Issue	08.01.2026

This privacy notice describes how we collect and use personal information about you for the purpose of the School Archive, in accordance with the UK General Data Protection Regulation (UK GDPR).

The information in this privacy notice applies to information held in, or being prepared for, the School Archive. If you require information about other personal data we process, please refer to our other privacy information, which can be found here:

<https://www.tedwraggtrust.co.uk/page/?title=MANAGEMENT+OF+INFORMATION&pid=60>.

Who Collects this Information

St James' School (the "School") within Ted Wragg Trust (the "Trust") collects and uses personal information in materials held in, or being prepared for, the School Archive. The Trust is the "data controller" for personal data held in, or being prepared for, the School Archive.

We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice does not form part of any contract to provide services and we may update this notice at any time.

It is important that you read this notice, together with any other policies mentioned within this privacy notice. This will assist you with understanding how we process our information and the procedures we take to protect your personal data.

Data Protection Principles

We will comply with the data protection principles when gathering and using personal information, as set out within our Data Protection Policy.

Categories of Information We Collect, Process and Hold

We may collect, store and use the following categories of information, which may include personal information about you, for the purpose of the school archive:

- Names of former pupils, staff, or community members
- Individual and group photographs
- Photos of the local area during development in the 1980s
- Written documents (e.g., newsletters, log books, trip records)
- Newspaper clippings and copies of press articles
- Film or video material
- Contextual information such as dates, events, and locations
- Information where given of submitted or donated materials, including name and date
- Identification survey responses, including name of respondent and personal recollections of dates and information relevant to identification of photographs

Some historical materials may incidentally contain special category data (e.g., information about an individual's health, ethnicity or religion).

How We Collect This Information

Identification survey:

The school uses Google Forms to collect information from individuals who may be able to identify people, dates, or events shown in historical photographs.

Survey respondents cannot view other people's responses and responses are not publicly accessible. Submissions are sent directly to the school and stored in a secure spreadsheet.

The survey and any responses are used solely to identify or confirm details relating to archived photographs. Once identification has taken place, names and dates will be written on the reverse of physical photographs and/or used to name digital files.

Google acts as a "data processor" for survey purposes and the Trust remains the "data controller". Where any supplier may access data from outside the UK for support or hosting, we used approved safeguards such as a UK International Data Transfer Agreement (IDTA) or the UK Addendum to the EU Standard Contractual Clauses.

Information in the archive:

Items are selected for permanent preservation through our archival appraisal process, which considers historical relevance, evidential value, condition, and duplication.

How and Why We Use Your Information

We will only use your personal information when the law allows us to. Personal data is collected and processed for the purpose of archiving in the public interest, specifically to:

- Preserve and document the life, development, and social history of the school
- Enable historical research into the school and its community
- Safeguard the school's institutional memory for future generations of staff and students

We will only use your personal information for these purposes, unless we reasonably consider that we need to use it for another purpose and that purpose is compatible with the original purpose.

The Lawful Bases on Which We Use This Information

Personal data is processed under Article 6(1)(e) UK GDPR: processing is necessary for the performance of a task carried out in the public interest, namely archiving, research, and preservation of historical records.

Where special category data appears incidentally in historical records, it is processed in accordance with Article 9(2)(j) UK GDPR: archiving in the public interest.

Where materials are retained for archiving in the public interest, we apply the safeguards required by Article 89 UK GDPR and section 19 of the Data Protection Act 2018 (i.e., data minimisation; measures to avoid substantial distress; and ensuring archived processing is not used for decisions about an individual).

How We Use Particularly Sensitive Information

Sensitive personal information (defined under the UK GDPR as "special category data") require higher levels of protection and further justification for collecting, storing, and using this type of personal information.

Where special category data appears in archival materials, we:

- Limit collection to what is necessary for archiving in the public interest
- Restrict access as appropriate following a sensitivity review

- Use pseudonymisation or anonymisation where feasible
- Do not use archived data to make decisions or take measures about any individual

The School Archive does not include any criminal offence data.

Sharing Data

The archive is not publicly accessible. Access is currently limited to authorised staff for preservation purposes. Future access may be considered for alumni or researchers, subject to capacity, safeguarding, and school approval.

Wider dissemination of historical content may occur indirectly through an internally approved publication (e.g. a school history book).

Before any publication or display, we conduct a sensitivity review to minimise identifying details of living individuals where appropriate. If a living individual is identifiable in published material and raises concerns, we will assess the request and, where appropriate, edit or remove the item.

Personal data within the archive is not shared with third parties, except:

- Long-term loan of historic handwritten log books and admissions registers to Devon Heritage Centre for conservation purposes after digitisation. DHC

Loans are governed by written agreements setting roles and responsibilities, confidentiality, and security arrangements.

The school is committed to improving transparency regarding its archive. Planned measures include:

- Maintaining internal documentation covering cataloguing, access, and care procedures.
- Ensuring future staff are aware of the archive and its purpose.
- Creating a dedicated school website page outlining the history project and existence of the archive, and a follow-up page giving an overview of the history of the school.

There is a criteria in place to ensure donations are relevant to the school's history and that no duplicates are retained. Material donated from past students or staff that have been added to the archive this year includes scans of photos; memorabilia such as event programmes, school rules, and lists of staff; items of past school uniform, scans of school project books relating to school trips, and the past student surveys.

Retention Periods

Identification survey responses will be retained for one month following the end of the identification project, to ensure correct identification has been completed.

Archived materials of enduring value are retained permanently. This includes past student surveys, which serve the purpose of anecdotal social history contributions. Data is not kept longer than necessary for the purpose of archiving in the public interest.

Further detail is set out in our Data Retention Policy:

<https://www.tedwraggtrust.co.uk/page/?title=MANAGEMENT+OF+INFORMATION&pid=60>

Security

We have put in place measures to protect the security of your information (i.e., against it being accidentally lost, used or accessed in an unauthorised way). You can find further details of our security procedures within our Information Security Policy and Data Breach Policy, which can be found:

<https://www.tedwraggtrust.co.uk/page/?title=MANAGEMENT+OF+INFORMATION&pid=60>

Devon Heritage Centre operates under its own strict archival and data protection policies.

Your Rights

Under certain circumstances, by law you have the right to:

- Access your personal information (commonly known as a “subject access request”). This allows you to receive a copy of the personal information we hold about you and to check we are lawfully processing it. You will not have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.
- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it.
- Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
- To object to processing in certain circumstances (for example for direct marketing purposes).
- To transfer your personal information to another party.

If you want to exercise any of the above rights, please contact Jayne Powney at: dataprotection@tedwraggtrust.co.uk

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

As the School Archive processes personal data for the purpose of archiving in the public interest, some rights may be limited where complying would seriously impair the archiving purpose, and where appropriate safeguards are in place.

We consider each request individually and record our decision. To exercise your rights, please contact us using the details below.

How to Raise a Concern

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with dataprotection@tedwraggtrust.co.uk in the first instance.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by dataprotection@tedwraggtrust.co.uk, then you can contact the DPO on the details below:

Data Protection Officer: Judicium Consulting Limited

Address: 5th Floor, 98 Theobalds Road, London, WC1X 8WB
Email: dataservices@judicium.com
Web: www.judiciumeducation.co.uk

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues at <https://ico.org.uk/concerns>.

Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any substantial changes. We may also notify you in other ways from time to time about the processing of your personal information.