

HERRIES PREPARATORY SCHOOL PRIVACY NOTICE



Reviewed annually

Headteacher (DPO) Reviewed July 2020 to add further details of types of data

Headteacher (DPO) Reviewed May 2019 to add further details of types of data

Headteacher (DPO) May 2018

This notice is **held on the school website** and it has been updated to comply with the ICO Privacy Notice Code of Practice 2016 and GDPR. It should be read together with, Herries Terms and Conditions, the Parent Contract, our Safeguarding Policy, Health & Safety Policies, Acceptable Use Policies and the Admissions paperwork.

This notice gives transparency to data processing and inform parents, pupils and staff:

- What information is collected
- By whom
- How
- Why
- How it is used
- Who it is shared with

We, Herries Preparatory School, are the Data Controller of personal data about all pupils from Nursery- Y6 and their parents and/or guardians for the purposes of GDPR. Personal data processed by the School includes pupil details, characteristics, contact details, exam and other assessment results including Eexat, attendance information, special educational needs, and images of pupils engaging in School activities (and in relation to parents and/or guardians, may include financial information) and any relevant medical information. The School may also process sensitive personal data such as ethnic group, religious beliefs and relevant medical information. Your personal data will usually be collected directly from you, but some may be passed to the School by third parties. We have overall responsibility for protection and compliance whilst using Data Processors. We hold this personal data and use it to:

- support pupils teaching and learning
- provide appropriate pastoral care
- monitor and report on pupil progress
- assess how well the school is doing

We are required by law to pass information to the Local Authority (LA), and Department for Education (DfE). Data is also sent to other agencies, as prescribed by law, such as ISI, DfE and RBWM. These authorities are data controllers for the information they hold and receive. If you would like to see a copy of the information held please contact the Herries School office.

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Everyone has a responsibility for the security of personal data and this is something we as a school take seriously.

Personal data processed by the School: The School collects personal information about pupils and parents when initially joining the School as well as at different times during the year where it is deemed necessary for administration of the school. The School will not ask for information that is not relevant and all data that is collected will be used for legitimate purposes as deemed by the School.

Personal data processed by the School includes contact details, test and other assessment results, attendance information, dietary requirements, SEND information, images, audio and video of pupils engaging in School activities (and in relation to parents and/or guardians, may include financial information).

The School may also process sensitive personal data such as ethnic group, religious beliefs and relevant medical information. Your personal data will usually be collected directly from you, but some may be passed to the School by third parties.

We process data in line with applicable law with respect to safeguarding by asking for explicit consent where this is deemed necessary.

Collecting, handling and sharing personal data: The School collects most of the personal data we process directly from the individual concerned (or in the case of pupils, from their parents or guardians). In some cases, we collect data from third parties (for example, referees, previous schools, the Disclosure and Barring Service, or professionals or authorities working with the individual) or from publicly available resources.

Personal data held by us is processed by appropriate members of staff for the purposes for which the data was provided and in allowing them to perform their duties and responsibilities. As a result, different members of staff will have access to different categories of personal data depending upon their role. The School takes 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.

The School avoids transferring personal data outside of the European Economic Area unless we are satisfied that the personal data will be afforded an equivalent level of protection (e.g. Privacy Shield in the US).

Some of the School's systems are provided by third parties, e.g. school website, Parent Evening System, Google Drive, Microsoft Office 365 or other cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions.

The School may also share data in the following ways:

- In accordance with our legal obligations, the School may share information with local authorities, the Independent Schools Inspectorate, Independent School Association and the Department for Education, for example, where the School has any safeguarding concerns.
- On occasion, the School may need to share information with the police.

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- The School may also need to share information with our legal advisers for the purpose of obtaining legal advice.
- If your child is not of British nationality the School has to make sure that your child has the right to study in the UK and may have to provide information about you to UK Visas and Immigration to comply with our duties as a Tier 4 sponsor.
- If you have unpaid fees while your child is at the School, the School may share information about this with other schools or educational establishments to which you intend to send your child. The School may also share your details with debt collection services.
- If your child leaves us to attend another school, the School may need to provide that school with information about you. For example, details of family circumstances for safeguarding reasons as part of the pupil file.
- The School may share information about you with others in your family, such as another parent or step-parent. For example, where this is part of our obligation to take care of your child, as part of our wider legal and regulatory obligations, or in connection with school fees.
- The School may need to share information if there is an emergency.
- In the course of school business, the School may also share personal data (including special category personal data such as health or religion where appropriate) with third parties such as the School doctors, the School's professional advisors and relevant authorities (e.g. the Local Children Safeguarding Board, DBS, HM Revenue and Customs, Department for Education and Department for Work and Pensions).
- EYFS information is used to provide a safe environment and quality provision for each child. It also provides access to funding from the local authority (LA) and to submit data for headcounts and the census. We hold paper forms and electronic registration forms, medication forms, accident records, EeXaat data, names, addresses, dates of birth and ethnicity data etc which is safely stored, shared, transported and retained in line with our policies and safe working practices.

The School does not otherwise share or sell personal data to other organisations for their own purposes.

Purposes in which your data may be processed: The School will use personal data about individuals for a number of purposes as part of its operations, including as follows:

- For the purposes of pupil admissions and to confirm the identity of prospective pupils and their parents. This information is used to form the pupil file.

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- To provide data needed for SEND provision, enrichment, and extra-curricular activities to pupils; as well as in monitoring pupils' progress and educational needs across the school.
- For the purposes of management planning and forecasting, research and statistical analysis.
- 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 future schools as needed.
- To enable pupils to take part in national or other assessments such as CAT4 testing, common entrance and scholarship. We may publish the results of public examinations or other achievements of pupils if this is deemed beneficial to the pupil or the School.
- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency or accident, including by disclosing details of an individual's medical condition where the school believes it is in the individual's interests to do so, for example for medical advice, insurance purposes or to organisers of school trips.
- To monitor use of the School's IT and communications systems in accordance with the School's Acceptable Use Policy.
- To make use of photographic images of pupils, parents, volunteers and staff in school publications, on the School website and on the School's social media channels in accordance with permission given by parents when their child joined the school or when we update consent registers.
- To make use photographic images of pupils, volunteers and staff on teaching and learning based platforms such as Eexat.
- In the set-up, maintenance and support in the administration of cloud based platform, the Parent Portal and The Parents Evening booking system.
- For security purposes (including the capture and retention of images on the school's CCTV cameras), and for regulatory and legal purposes (for example child protection and health and safety) and to comply with its legal obligations.
- We may use your information for marketing purposes in making parents aware of relevant school events.
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

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- To contact individuals (including via any external organisations used for the purpose) by post, email and telephone.
- To store provided personal information on the school system.
- Collect information from publicly available sources to identify possible working relationships and reputational risks to the School.
- The School may also collect data for pupils from N-Y6 as part of the School Census.

Making changes to the data we store: We aim to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Please notify the school office of any significant changes to important information, such as contact details, held about you. We will then update our records to ensure accuracy.

Consent: Parents, guardians, alumni and pupils themselves can refuse consent for any type of personal data processing as detailed with this policy. Consent can also be withdrawn as any time by emailing the office.

Retaining data for records: We keep your information for as long as we need to in order to educate and look after your child. We will keep some information after your child has left the school if it is a requirement of the School. In exceptional circumstances we may keep your information for a longer time than usual but we would only do so if we had a good reason and only if we are allowed to do so under data protection law. We can keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes and is a requirement of the School with prior consent.

Who can access your data and data security? The security measures in place to protect data held electronically are set out in the School's Acceptable Use Policy, which is reviewed annually. All data on the School's network is protected by anti-virus software that runs on servers and workstations and is updated automatically. Data on the School's Network is backed-up daily. Personal data held in manual files is only accessible by authorised individuals and, where of a confidential nature, is kept in locked filing cabinets or cupboards when not in use. Paper-based copies of personal data (or other sensitive or confidential data) are disposed of in a secure manner, by shredding. The physical security of the school premises is checked by the appropriate staff regularly and all staff. This is in line with the school policy. The School ensures that prior to the transfer of any personal data to a third party for processing, the third party has appropriate technical and organisational security measures governing the processing to be carried out. New staff are required to read and understand the IT Acceptable Use Policy as part of their induction as well as understand this policy itself.

Any lapses in data security will be reported to the School at the earliest opportunity by members of School staff.

Accessing your personal information: You have various rights under data protection law to access and understand the personal data we hold about you, and in some

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cases to ask for it to be erased or amended or for us to stop processing it, but subject to certain exemptions and limitations.

As a school we would also like to make you aware of the following rights you have as a “data subject”:

The right to:

- be informed
- access your data
- rectify any errors
- be forgotten
- restrict processing
- data portability
- object
- rights in relation to automated decision making and profiling

You can find out more about all of the above by visiting the Information Commissioner’s Office website: www.ico.org.uk

You have the right to withdraw consent, where given, or otherwise object to receiving generic or fundraising communications. Please be aware however that the school 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 exist under some form of contract or agreement with the individual (e.g. an employment or parent contract)

If you would like to access or amend your personal data, or would like it to be transferred to another person or organisation, or have some other objection to how your personal data is used, please make your request in writing to the school.

We will 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.

We will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, we 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 privilege.

We are also not required to disclose confidential references given by the school for the purposes of the education, training or employment of any individual.