



# HARRODIAN

## Privacy Policy

### Introduction

Harroddian respects your privacy and is committed to protecting the personal information that you share with us. This privacy policy provides detailed information about how we process personal data. Please read it carefully and, if you have questions regarding your personal data or its use, please contact us by email, by telephone on 020 8748 6117, or by post at Harroddian School, Lonsdale Road, Barnes, London SW13 9QN.

We process personal data about prospective, current and past pupils and their parents, staff, suppliers and contractors, donors, friends and supporters, and other individuals connected to or visiting the School.

### About this policy

The School needs to process personal data about its current, prospective and former pupils and their parents, its current, prospective and former staff, its suppliers/contractors, its current and prospective supporters and other individuals connected to the School, as part of its everyday operations. The School will process such personal data in accordance with the Data Protection Act 2018 ("the DPA 2018") and General Data Protection Regulations (EU) 2016/679 (GDPR).

### Types of personal data we process

The personal data we process takes different forms – it may be factual information, expressions of opinion, images, or other recorded information which identifies or relates to a living individual. Examples include:

- names, addresses, telephone numbers, email addresses and other contact details;
- family details;
- admissions, academic, disciplinary and other educational related records, information about special educational needs, references, examination scripts and marks;
- education and employment data;
- images, audio and video recordings;
- financial information (e.g. for bursary assessment or for fund-raising);
- courses, meetings or events attended.

We do so in accordance with applicable law (including with respect to safeguarding or employment) or by explicit consent.

We will on occasion process more sensitive personal data about an individual. This special category includes data concerning their sexual orientation, racial or ethnic origin, religious beliefs, criminal records and proceedings, trade union membership and relevant medical information (including details of a subject's physical or mental health). Sensitive data is processed only where necessary for the provision of education and educational support and ancillary services or for a person's employment.

### **Collecting, handling and sharing personal data**

We collect most of the personal data we process directly from the individual concerned (or in the case of pupils, from their parents). 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. We 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. We do not transfer personal data outside of the European Economic Area unless we are satisfied that the personal data will be afforded an equivalent level of protection.

In the course of School business, we share personal data (including special category personal data where appropriate) with third parties outside the School such as; examination boards, doctors, educational, physical and mental health professionals and relevant authorities (e.g. the Local Children Safeguarding Board, DBS, NCTL, UK Visas and Immigration, HM Revenue and Customs, Department for Education and Department for Work and Pensions). Some of our systems are provided by third parties, e.g. hosted databases, school website, school calendar, school post and Edulink Parents Portal or 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.

### **Pupils joining / leaving**

If a pupil leaves the School, it is the school's policy to notify the Local Authority. This notification will include the full name of the pupil, the full name, address and contact telephone numbers of the parent/s with whom the pupil normally resides, the pupil's future address and destination school, together with the reason why the pupil has left the School.

Likewise, it is the school's policy to notify the Local Authority when a pupil joins the School. This notification will include all the new pupil's details as listed in the school's admission register.

We do not otherwise share without implicit consent, personal data. We will never sell personal data to other organisations for their own purposes.

## Purposes for which we process personal data

We process a wide range of personal data to support our operations as an independent school for boys and girls aged 4 to 18. Some of this activity is to meet our legal rights, duties and obligations. This includes those under a contract with staff, parents and our pupils. We also expect the use of personal data will be made in accordance with the School's legitimate interests, provided it does not involve special category data. The following processing is carried out to meet our obligations and interests:

- The selection and admission of pupils;
- The provision of education to pupils including the administration of the School curriculum and timetable; monitoring pupil progress and educational needs; reporting on the same internally and to parents; administration of pupils' entries to public examinations, reporting upon and publishing the results; providing references for pupils (including after a pupil has left);
- The provision of educational support and related services to pupils (and parents) including the maintenance of discipline; provision of careers and library services; administration of sports fixtures and teams, school trips; provision of the School's IT and communications system all in accordance with our IT policies;
- The provision of educational trips during school time and holidays to pupils enrolled on such courses;
- The safeguarding of pupils' welfare and provision of pastoral care, welfare and health care services by School staff;
- The research into, and development of, effective teaching and learning methods and best practice;
- Compliance with legislation and regulation including the preparation of information for inspections by Ofsted and submission of annual census information to the Department for Education;
- Operational management including the compilation of pupil records; the administration of invoices, fees and accounts; the management of the School's property; the management of security and safety arrangements (including the use of CCTV and monitoring of the School's IT and communications systems); management planning and forecasting; research and statistical analysis; the administration and implementation of the School's rules and policies for pupils and staff; the maintenance of historic archives and other operational purposes;
- Staff administration including the recruitment of staff, engagement of contractors (including compliance with DBS procedures); administration of payroll, pensions and sick leave; review and appraisal of staff performance; conduct of any grievance, capability or disciplinary procedures; the maintenance of appropriate human resources records for current and former staff; and providing references;
- The promotion of the School through its own websites, the prospectus and other publications and communications (including through our social media channels); and
- Maintaining relationships with Alumni and the wider School community by communicating with the body of current and former pupils and/or their parents or guardians and organising events.

The processing set out above is carried out to fulfil our legal obligations (including those under our parent contract and staff employment contracts). We also expect these purposes to form our legitimate interests.

### **Keeping in touch**

We keep in touch with Alumni, current or former parents or other members of the school community. We will use your contact details to keep you updated about our charitable activities and invite you to events of interest by email and by post. We ask you to let us know your data preferences so that we can ensure our communications are relevant to you. You can update your data preferences at any time by sending an email to [gdpr@harrodian.com](mailto:gdpr@harrodian.com). Your data preferences will not affect our contact with you as a current parent or Alumni.

### **How long we keep personal data**

We retain personal data only for a legitimate and lawful reason and only for so long as necessary or required by law. We have adopted Records Retention Guidelines which set out the time period for which different categories of data are kept. Typically, the legal recommendation for how long to keep ordinary staff personnel and pupil files is up to 7 years following departure from the school. However, the ongoing Independent Inquiry into Child Sexual Abuse (IICSA) has issued restrictions regarding pupils' records. Whilst this Inquiry is underway, we intend to retain pupil files until further direction is received. If you have any specific queries about our record retention periods, or wish to request that your personal data is considered for erasure, please contact the School.

### **Your rights**

You have various rights under Data Protection Law to access and understand the personal data we hold about you, and in some cases to ask for it to be erased or amended or for us to stop processing it, but subject to certain exemptions and limitations.

You always 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 Policy, or may exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because of a purchase of goods or services).

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 aim to 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 any pupil examination scripts (though examiners' comments may have to be disclosed), nor any confidential reference given by the School for the purposes of the education, training or employment of any individual.

### **Pupil data**

The rights under Data Protection legislation belong to the individual to whom the data relates. However, for those pupils under 13, we will rely on parental consent to process personal data relating to pupils. Furthermore, for over 13s, when given the nature of the processing in question, it may be more appropriate to rely on the parents' consent.

Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

In general, we will assume that pupils' consent is not required for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare, unless, in the School's opinion, there is a good reason to do otherwise.

However, where a pupil over 13 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 the pupil or other pupils, or is required by law.

Pupils over 13 can make Subject Access Requests for their own personal data, provided that they have sufficient maturity to understand the request they are making. A person with parental responsibility will generally be entitled to make a subject access request on behalf of pupils, but the information in question is always considered to be the child's at 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.

### **Change of details**

We try to ensure that all personal data held in relation to an individual is as up to date and as accurate as possible. Please notify the School of any significant changes to important information, such as contact details, held about you.

### **This policy**

Our *Privacy Policy* should be read in conjunction with our other policies and Terms and Conditions which make reference to personal data, including our *Acceptance Form*, our *Safeguarding Policy*, *Health and Safety Policies*, *Acceptable Use Policies* and *IT Policies*.

We will update this Privacy Policy from time to time. Any substantial changes that affect how we process your personal data will be notified on our website and to you directly, as far as practicable.

If you believe that we have not complied with this policy or have acted otherwise than in accordance with Data Protection Law, you should notify the Chief Privacy Officer. 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 us before involving them.

### **Enforcement**

This policy forms part of the Terms and Conditions of employees' contracts of employment. A breach of this policy may be regarded as misconduct, leading to disciplinary action up to and including summary dismissal.

Person responsible: Chief Privacy Officer (Head of Seniors) Last update: February 2019  
Next update: February 2020