



LADY BARN HOUSE SCHOOL

Privacy Notice for Parents

This privacy notice will be provided to parents, carers and guardians (referred to for these purposes as parents) at the time data is obtained, if it is being obtained directly. The School collects personal data through registration and application forms. Given the age of our pupils this data will generally be provided by the parent.

The School is registered with the Information Commissioners Office (the ICO) under the terms of the Data Protection Act 1998. The School is registered as a Data Controller with the reference Z4595859.

We believe that protecting the privacy of our pupils and regulating their safety through data management, control, and evaluation is vital to the operation of the School. We take responsibility for ensuring that any data that we collect and process is used correctly and only as is necessary, and the School will keep parents fully informed of the how data is collected, what is collected, and how it is used.

There may be circumstances where the School is required either by law or in the best interests of our pupils to pass information onto external authorities, for example the local authority, the Department of Health, the Independent Schools Inspectorate, other official agencies or the School's insurers. These authorities are up to date with data protection law and have their own policies relating to the protection of any data that they receive or collect.

There is no automated decision making or profiling involved in this data stream into and through the school.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

The School collects and processes data within the category of its "legitimate interests", including:

- names, addresses, telephone numbers, e-mail addresses and other contact details, date of birth, medical information, emergency contacts - for the purposes of pupil admission and administration;
- bank details and other financial information, e.g. about parents who pay fees to the School;
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs);
- references given or received by the school about pupils, and information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- images of pupils (and occasionally other individuals) engaging in school activities, and images captured by the School's CCTV system (in accordance with the school's policy on taking, storing and using images of children & the CCTV policy);
- information to facilitate the provision of education services, including musical education, physical training (including swimming lessons) or spiritual development, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- 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;
- information to enable pupils to take part in national or other assessments;
- safeguarding pupils' welfare and provide appropriate pastoral care;

- information to facilitate maintaining relationships with alumni and the school community, including direct marketing or fundraising activity;
- use of photographic images of pupils in school publications, on the school website 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;
- where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School;
- where appropriate, names and contact details of visitors to the school site, including pupils visiting from other schools for competitions or school events;
- processing in some instances of special category personal data (concerning health, ethnicity, religion and biometrics);
- legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

HOW THE SCHOOL COLLECTS DATA

The School receives the majority of personal data from the parents. This will be via a series of forms, both electronically and in hard format, in the ordinary course of interaction and via communications such as letters, emails or written assessments. This may also be via the School's MIS system and Parent app.

Personal data may also be supplied by third parties (for example another school, or other professionals or authorities working with that individual), collected from publicly available resources or from previous schools/employers in the case of staff.

The School operates CCTV on the premises for the safety of pupils, staff and visitors, footage is kept for 2 weeks in line with our CCTV policy unless an incident necessitates further retention

RESPONSIBILITY FOR DATA PROTECTION

The School has appointed the Bursar as its Data Protection Officer (DPO). The DPO will deal with any of your requests and enquiries concerning the school's uses of your personal data and endeavour to ensure that all personal data is processed in compliance with this policy.

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

- any contract between the school and the parents of pupils;
- the School's data policies, including taking, storing and using images of children;
- the School's policy on CCTV;
- the School's Data Protection policy;
- the School's Anti Bullying policy;
- the School's Child Protection and Safeguarding policies and health and safety policies, including how concerns or incidents are recorded; and
- the School's IT policies, including Acceptable Use

WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL SHARES IT WITH

Occasionally, the School may need to share personal information relating to its community with third parties, such as professional advisers (lawyers and accountants) or relevant authorities (police or the local authority). The School may also share limited pupil details, such as name, email address, year group etc. with selected third parties for the purposes of providing access to extra-curricular

activities and external coaches and limited contact information with transport companies where arranging transport, for example for school trips.

Details of food allergies or other relevant information may be shared with third party caterers and other parties where necessary to ensure safe delivery of catering or other services.

For the most part, personal data collected by the School will remain within the School and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of medical records held.

A certain amount of any SEN pupil's relevant information will also need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

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

The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason and in line with the retention of records policy. Typically, the legal recommendation for how long to keep ordinary pupil files is up to 7 years following departure from the School (or until age 25, whichever is the later, in the case of pupils). However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

A limited and reasonable amount of information will be kept for archiving purposes, for example, school magazines, admissions registers, annual reports and documents of a historical nature. Where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes.

YOUR RIGHTS

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the School, and in some cases ask for it to be erased or amended or for the School 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 DPO.

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

DATA ACCURACY AND SECURITY

Hard copy data, records, and personal information should be stored out of sight and in a locked cupboard no matter what format it is in. The only exception to this is medical information that may require immediate access during the school day. This will be stored with the school nurse.

Sensitive or personal information and data should ideally not be removed from the school site, however the school acknowledges that some staff may need to transport data between the school and their home in order to access it for work in the evenings and at weekends. The school has endeavoured to minimise this through development of I systems and procedures. This may also apply in cases where staff have offsite meetings, or are on school visits with pupils.

This policy will be reviewed to comply with 2018 changes under the GDPR annually.

Next Review Date: 18/06/2019