



## PRIVACY POLICY

### INTRODUCTION

Richmond House School (Limited by guarantee with charitable status) is an independent primary and nursery school for children aged rising 3 to 11 years. Registered Charity No. 505630.

This policy is intended to provide information about how Richmond House School will use or process personal data about individuals including: our staff (including candidates who apply for roles), our current, past and prospective pupils and their parents, carers or guardians (referred to in this policy as "parents").

If you have any questions regarding your personal data or its use please contact our Data Manager, Tracey Looker by email on [enquiries@rhschool.org](mailto:enquiries@rhschool.org); by telephone on 0113 275 2670 or by post at Richmond House School, 170 Otley Road, Leeds, LS16 5LG.

### TYPES OF PERSONAL DATA WE PROCESS

This will include, by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- family details;
- financial information;
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- education and employment data; and
- images to include audio and video recordings

As a school, we will also need to process special category data (this is known as sensitive personal data and examples cover data concerning health, ethnicity, or religion). We do so in accordance with applicable law (including with respect to safeguarding and employment law).

### COLLECTING, HANDLING AND SHARING DATA

Generally, the school receives personal data from the individual directly (including, in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

However in some cases personal data may be supplied by third parties (for example another school, or other professionals or authorities working with that individual); or collected from publicly available resources.

For the most part, personal data collected by us will remain within the school, and will be processed by appropriate individuals only in accordance with access protocols and data protection legislation.

Occasionally, we will need to share personal information with third parties, such as professional advisers (lawyers and accountants) or relevant authorities (HMRC, police or the local authority).

In addition, some of our processing activity is carried out on our 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.

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. An example of where we may need to transfer data in this way is for any school trips that take place abroad.

## PURPOSE OF PROCESSING PERSONAL DATA

In order to carry out our ordinary duties to staff, pupils and parents, we may need to process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of our daily operation.

Some of this activity we will need to carry out in order to fulfil our legal rights, duties or obligations – including those in order to meet our contractual obligations to our staff, or parents of its pupils.

Other uses of personal data will be made in accordance with the school's legitimate interests.

We expect that the following uses may fall within that category of "legitimate interests":

- For the purposes of pupil admission (and to confirm the identity of prospective pupils and their parents);
- To provide education services, including musical education and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Maintaining relationships with alumni and the school community, including direct marketing or fundraising activity;
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and supporters and their background and relevant interests;
- To enable relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate;
- Compliance with legislation and regulation including the submission of census information to Department for Education and the Independent Schools Council;
- Operational and administrative purposes, including the compilation of pupil records, the administration of invoices, analysis for the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as diversity or gender pay gap analysis and taxation records);
- 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 employers of past pupils;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the school;
- To safeguard pupils' welfare and provide appropriate pastoral care;
- To monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's IT: acceptable use policy;
- The promotion of the school through its website, the prospectus and other publications and communications (including through our own social media channels) in accordance with relevant policies;
- For security purposes, including CCTV in accordance with the school's CCTV policy; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.
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In addition, we may need to process **special category personal data** (for example concerning health, ethnicity, religion,) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons may include:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so: for example for medical advice, social services, insurance purposes or to organisers of school trips;
- To provide educational services in the context of any special educational needs of a pupil;

- In connection with employment of its staff, for example DBS checks, pensions and sick leave; review and appraisal of staff performance and the maintenance of appropriate human resources records for current and former staff.

### **HOW LONG WE KEEP PERSONAL DATA**

We will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. We follow the ISBA Guidelines on the Retention of Records which set out the time period for which different categories of data are kept.

### **KEEPING IN TOUCH AND SUPPORTING THE SCHOOL**

We will use the contact details of parents, alumni and other members of the school community to keep them updated about the activities of the school, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, we may also:

- Contact parents and/or alumni by post and email in order to promote and raise funds for the school and, where appropriate, other worthy causes;
- Collect information from publicly available sources about parents' and former pupils' occupations and activities, in order to maximise the school's fundraising potential.

An individual will always have the right to withdraw their consent, where given, or otherwise object to direct marketing or fundraising. However, we may need nonetheless to retain some of personal details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

### **YOUR RIGHTS**

Individuals have various rights under the Data Protection Law to access and understand personal data that we hold about them, 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.

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 Manager.

We 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. 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, the school may ask the person making the request to reconsider or charge a proportionate fee, but only where the school is legally allowed to do so.

Please note 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. The school is also not required to disclose any pupil examination scripts (though examiners' comments may fall 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 Law belong to the individual to whom the data relates. However, the school will often rely on parental consent to process personal data relating to pupils at our school unless, given the nature of the processing in question, and the pupil's age and understanding, it is more appropriate to rely on the pupil's 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.

However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the school may be

under an obligation to maintain confidentiality unless, in the school's 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 if required by law.

Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the school, they have sufficient maturity to understand the request they are making. Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger pupils, 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 his/her behalf. Moreover (if of sufficient age) their consent or authority may need to be sought by the parent making such a request.

#### **DATA ACCURACY**

We 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 Data Manager of any significant changes to important information, such as contact details, held about them.

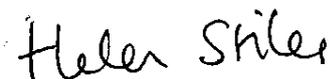
An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under applicable law): please see above for details of why the school may need to process an individual's data, and who to contact in the event of a disagreement.

#### **THIS POLICY**

The school will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable. Our privacy policy should be read in conjunction with our other policies and terms and conditions which make reference to personal data, including our Parent Handbook, Safeguarding and Child Protection Policy, Health & Safety and IT Policies.

If an individual believes that we have not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should notify the Data Manager. The individual 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 the school before involving them.

**A review of this policy, through the Governing body and the SLT, is undertaken within 3 years of the last review date.**



Signed (Headteacher):



Signed (Chair of Governors):

**Policy Reviewed November 2018**