



Old Vicarage School

Old Vicarage School Trust, 48 Richmond Hill, Richmond Upon Thames, Surrey TW10 6QX

Registered Office: 48 Richmond Hill, Richmond upon Thames, Surrey TW10 6QX. Company Registration No. 1092758.

Head: Mrs Gillian Linthwaite MA (Oxon). Registered Charity No: 1092758

PRIVACY NOTICE

This Privacy Notice explains how and why the School collects personal information and what the School does with that information. It also explains the rights individuals have in relation to their personal information.

This Notice applies to all members of the Old Vicarage School community (past and present) and is in addition to any other relevant terms and conditions including any contract between the School and its staff or parents of pupils.

The information in this Notice should be read in conjunction with other relevant School's policies on: Child Protection & Safeguarding; Behaviour; Anti-Bullying; E-Safety, Health & Safety; Recruitment; Individual Needs; First Aid & Medical Conditions Management; and Acceptable use of Technology Agreement (Parents & Pupils).

Responsibility for Data Protection

Old Vicarage School is a data controller for the purposes of the General Data Protection Law which means it determines how an individual's personal data is processed and for what purpose.

The School has appointed a Compliance Administrator who in conjunction with the Bursar, will deal with all 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 and Data Protection Law.

If you have any questions about this notice, please contact the Compliance Administrator at:

data@oldvicarageschool.com

Why the School needs to process personal data

Personal data is information that identifies you as an individual and relates to you. We need to process (or "use") a wide range of personal data relating to staff, pupils and parents (past, present and future) as part of our daily operation.

The types of personal data processed by the school includes:

- Identity and contact details
- Financial and bank account information
- Academic, disciplinary, admissions and attendance records
- Information about health and special educational needs
- References given or received
- Images of pupils, parents and staff engaging in school activities and those on the School's CCTV system.

We need to carry out some of this processing in order to fulfil our legal rights, duties or obligations, including those under a contract with our staff or parents of our pupils.

Other uses of personal data will be made in accordance with the School's legitimate interests, or the legitimate interests of another, except where the processing is unfair or involves special (or sensitive) types of data.

Legitimate interests

We consider that the following uses fall within the category of legitimate interests:

- Providing educational services, including music, sports and extra-curricular activities.
- Safeguarding and providing appropriate pastoral care.
- Monitoring progress and educational needs.
- Enabling participation in national and other assessments.
- Facilitating the safe and efficient operation of the School.
- Giving and receiving information about past, present and future pupils, parents and staff.
- Ensuring compliance with legal obligations.
- Maintaining relationships with the school community (past and present).
- Publishing achievements.
- Using School photographs in School publications, on the School website and the School VLE (Firefly).
- Monitoring (as appropriate) use of the School's IT and communications systems.
- Ensuring the security of the School site and the personal safety of staff, pupils and visitors (CCTV).

Special categories of personal data

The School may need to process some personal data that is categorised as being 'special'. This includes religious or philosophical beliefs, racial or ethnic origin, physical or mental health, political opinions, trade union membership, biometrics, sexuality and criminal offences.

The reasons we need to process 'special' data may include:

- Safeguarding the welfare of our pupils and staff.
- Ensuring that members of our school community with individual and special educational needs are not disadvantaged.
- Complying with our legal and regulatory obligations and duties of care.

We are required to ask for your explicit consent to hold and use 'special' data except where we are acting under a statutory right or obligation (e.g. employment or safeguarding) or if urgent grounds exist (e.g. preventing or detecting a crime, working with social services). You may withdraw this consent at any time, subject to certain conditions. Please see 'Access to Information – Exemptions'.

How we collect personal data

Generally, we receive personal data from the individual directly or, in the case of pupils, from their parents. This may be via a form or through ordinary interaction or communications, such as email or written assessments. Personal data may also be supplied by third parties such as another school, or other professionals or authorities.

Data accuracy

The School will endeavour to ensure that all personal data held is as up to date and accurate as possible. Individuals are required to notify us of any changes to information held about them.

Security

The School is required to respect the personal data and privacy of others and must take all reasonable steps to ensure the security and confidentiality of personal data and establish the necessary safeguards to protect unauthorised access or accidental loss. All members of the school community share this responsibility.

Sharing personal data with third parties

For the most part, personal data collected by the School will remain within the School and will only be accessed by appropriate individuals as necessary. However, some information (e.g. medical details) will need to be provided to staff more widely to ensure the necessary pastoral care and support is provided to pupils.

In accordance with our legal obligations, we may also need to share information with third parties such as financial organisations, educational service providers (exam boards, assessment processors), professional advisers (lawyers, accountants), relevant authorities (HMRC, police or the Local Authority), other schools and / or service providers.

Safeguarding

The school is required to record, or report to relevant authorities, safeguarding incidents and concerns if they meet a certain threshold of seriousness in their nature or regularity. When a child leaves us to attend another school we may need to provide that school with details of family circumstances for safeguarding reasons.

Third party processing

Some of our data processing activity is carried out for us by third parties. We have contracts with these organisations which confirm that personal data may only be shared in accordance with Data Protection Law.

Personal information that is processed using other IT systems may be stored on computer servers based within the European Economic Area. Information will only be stored in those countries which the European Commission has determined have adequate data protection rules.

For how long do we keep your information?

We will keep personal information securely and as for as long as we are required to do for legitimate and lawful reasons. If you have any specific queries about this or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact us.

Keeping in touch

We will use the contact details of parents and other members of the school community to keep them updated about School activities. If you do not wish to receive information about school activities, please contact us.

What decisions can you make about your information?

You have the following rights:

- If information is incorrect you can ask us to correct it.
- You can ask us to tell you what information we hold about you; why we are holding it and who it could be disclosed to.
- You can ask us to provide you with a copy of the information in an intelligible form.
- You can ask us to delete the information that we hold about you provided we are not required, by legislation, to retain it.
- You can ask us to send you, or another organisation, certain types of information about you.
- You can ask us to stop sending you information about School events.
- You can tell us if you would prefer that certain information is kept confidential.

Access to information

Requests for access to information must be made in writing using the School's Data Subject Access form which should be completed and returned as instructed on the form.

Provided that there is sufficient information to process the request, the School will log the request along with the date of receipt and the planned date of supplying the information, which should be within one month of the request date. Should more information be required to establish either the identity of the data subject or the type of data requested, the date of entry in the log will be the date on which the sufficient information has been provided.

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.

Exemptions

Certain information is exempt from this right of access. This may include information which identifies other individuals, or information which is subject to legal professional privilege. We are not required to disclose any pupil examination scripts, nor any confidential reference given by the School for the purposes of the education, training or employment of any individual.

Where we are relying on consent as a means to process your personal data, you may withdraw this consent at any time. However, even without your consent we may have another lawful reason to process the data in question.

Children and data protection law

Under data protection law, children have the right to be informed how their personal data will be used. In the UK, the age at which it is considered that a child may exercise responsibility for specific types of consent is 13 years, so the School will rely on parental consent to process personal information relating to pupils.

Complaints

If you consider that we have not acted in relation to your personal data, you may follow the School Complaints Procedure.

You may also make a referral to, or lodge a complaint with, the Information Commissioner's Office (ICO) at ico.org.uk. However, the ICO recommends that steps are taken to resolve the matter with the School first.

Contacting us about your personal data

If you would like to contact the School in relation to your personal data, please contact the following:

Parent & Pupil personal data

The Registrar, Miss Fiona Murdoch at registrar@oldvicarageschool.com

Staff personal data

The HR Manager, Ms. Claire Nightingale at data@oldvicarageschool.com

Signed: **Gillian Linthwaite**
Position: Head

Greg Caplan
Chair of Governors

Last reviewed: March 2022
Interim reviews: November 2021
Next review: March 2023