

Privacy Notice for Pupils and Parents

1. Introduction

1.1 Reed's School is a registered educational charity based in Cobham, charity number 312008. For the purposes of the Data Protection Law, Reed's School (the School) is a data controller.

1.2 This Privacy Notice applies to personal data held and used ("processed") by the School about current, prospective and past pupils and their parents, carers or guardians (referred to in this policy as "parents").

1.3 This document is intended to provide information about how the School will use the personal data relating to individuals and is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used.

1.4 This Privacy Notice applies alongside any other information the School may provide about a particular use of personal data, for example when collecting data via an online or paper form.

1.5 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 policy on taking, storing and using images of children;
- the School's CCTV and biometrics policies;
- the School's retention of records policy;
- the School's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the School's IT policies, including its Acceptable Use policy.

1.6 Anyone who works for, or acts on behalf of, the School (including staff, volunteers, governors and service providers) should also be aware of and comply with this Privacy Notice.

2. Responsibility for data protection

2.1 Reed's School has appointed a Privacy Officer who will deal with any requests and enquiries concerning the School's uses of your personal data (see section on Your Rights below) and use their reasonable endeavours to ensure that all personal data is processed in compliance with this policy and Data Protection Law.

They can be contacted via email at privacyofficer@reeds.surrey.sch.uk.

3. Why the School needs to process personal data

3.1 In order to carry out its ordinary duties to pupils and parents, the School needs to process a wide range of personal data about individuals as part of its daily operation.

3.2 The School will need to carry out some of this activity to fulfil its legal rights, duties or obligations – including those under a contract with the parents of its pupils.

3.3 Other uses of personal data will be made in accordance with the School's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, provided it does not involve special or sensitive types of data.

3.4 The School expects that the following uses will fall within that category of its (or its community's) "legitimate interests":

- for the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents);
- to provide education services, including musical education, physical training or spiritual development, career services, 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 their background and relevant interests;
- for the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law;
- to enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;
- 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;
- to obtain and make use of photographs or images (including video recordings) of pupils for educational purposes, as part of the curriculum or extra-curricular activities. At the point that a pupil joins the School, consent is asked for the use of the pupil's image in School publications, on the School website and on the School's social media channels in accordance with the School's policy on taking, storing and using images of children;
- for security purposes, including biometrics and CCTV in accordance with the School's biometrics and CCTV policies;
- to carry out or cooperate with any School or external complaints, disciplinary or investigation process; and
- where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School.

3.5 In addition, the School will on occasion need to process special category personal data (such as health, ethnicity, religion or biometrics) or criminal records information to fulfil its

rights, duties or obligations imposed on it as part of a contract or by law, including as regards safeguarding, or from time to time by explicit consent where required. These reasons will 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 or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs;
- to provide educational services in the context of any special educational needs of a pupil;
- to run any of its systems that operate on biometric data, such as for security and other forms of pupil identification;
- as part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are SEN, health or safeguarding elements; or
- for 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.

4. Types of personal data processed by the School

4.1 This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);
- biometric information, which will be collected and used by the School in accordance with the School's biometrics policy;
- 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), and examination scripts and marks;
- where appropriate, information about individuals' health and welfare;
- references given or received by the School about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- correspondence with and concerning pupils and parents, prospective, past and present; and
- 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 and the CCTV policy).

5. How the School collects data

5.1 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).

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

6. Who has access to personal data and who the School shares it with

6.1 Occasionally, the School will need to share personal information relating to its pupils and/or parents with third parties, such as:

- companies or organisations providing educational resources or services (e.g. public exam boards, educational apps, School trip providers and extra curricular providers such as the Duke of Edinburgh award scheme);
- professional advisers and independent panel members appointed by the School (e.g. lawyers, insurers, PR advisers and accountants);
- government authorities (e.g. HMRC, DfE, police or the local authority); and
- appropriate regulatory bodies (e.g. the Independent Schools Inspectorate, the Charity Commission or the Information Commissioner).

6.2 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
and
- pastoral or safeguarding files.

6.3 However, a certain amount of any SEN and medically relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

6.4 Pupils and parents are reminded that the School is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on safeguarding files, and in some cases referrals to relevant external authorities. For further information about this, please view the School's Safeguarding Policy.

6.5 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 used only in accordance with the School's specific directions.

7. How long we keep personal data

7.1 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. Typically, the legal recommendation for how long to keep ordinary pupil files is until that pupil has reached the age of 25. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

7.2 If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Privacy Officer at privacyofficer@reeds.surrey.sch.uk. However, please bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data even following such request.

7.3 A limited and reasonable amount of information will be kept for archiving purposes, for example; and even 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.

7.4 Further information regarding the School's retention of data may be found within the School's Retention of Records policy.

8. Keeping in touch and supporting the School

8.1 The School 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, the School will also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the School community.
- Contact parents and/or alumni (including via the organisations above) by post and email in order to promote and raise funds for the School and, where appropriate, other worthy causes;
- Should you wish to limit or object to any such use, or would like further information about them, please contact the Privacy Officer at privacyofficer@reeds.surrey.sch.uk. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the School is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

9. Your rights

9.1 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 have it transferred to others, or for the School to stop processing it. These rights are subject to certain exemptions and limitations.

9.2 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 Privacy Officer at privacyofficer@reeds.surrey.sch.uk

9.3 The School will endeavour to respond to any such requests as soon as is reasonably practicable and 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 for information is manifestly excessive or similar to previous requests, the School may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

9.4 The limitations and exemptions to these rights are as follows.

- The right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations – please see further below), or information which is subject to legal privilege. The School is also not required to disclose any pupil examination scripts, internal or external. Neither is the School required to disclose examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the School itself for the purposes of the education, training or employment of any individual.
- We will sometimes have compelling reasons to refuse specific requests to delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. Where the School is relying on consent as a means to process personal data, any person may withdraw this consent at any time. Examples where we do rely on consent are: biometrics, certain types of uses of images, certain types of fundraising activity.

9.5 All requests will be considered carefully on a case by case basis.

Whose rights?

9.6 The rights under Data Protection Law belong to the individual to whom the data relates.

9.7 Pupils can make requests as detailed above 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. Pupils from aged 13 and above are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home. A pupil of any age may ask a parent to make a data request on his/her behalf.

9.8 In general, the School 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. That is unless, in the School's opinion, there is a good reason to do otherwise.

9.9 Parents will in general receive educational and pastoral updates about their children. Where parents are separated, the School will in most cases aim to provide the same information to each person with parental responsibility, but may need to factor in all the circumstances including the express wishes of the child.

9.10 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.

9.11 The School will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils – for example, under the parent contract, or via a form. Where consent is required, it may in some cases be necessary or appropriate – given the nature of the processing in question, and the pupil's age and understanding – to seek

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.

9.12 Pupils are required to respect the personal data and privacy of others, and to comply with the School's IT acceptable use policy and the School rules.

10. Data accuracy and security

10.1 The School 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 School office of any significant changes to important information, such as contact details, held about them, either by email to office@reeds.surrey.sch.uk, or by submitting the change via the Clarion Parent Message Centre or parent Firefly app. Changes to a pupil's medical details should be sent to the School's medical centre, at medical@reeds.surrey.sch.uk

10.2 The School will take appropriate technical and organisational steps to protect the personal data about individuals, including policies around use of technology and devices, and access to school systems. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

11. This policy

11.1 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. Minor changes will be made as needed, with the latest version always being available on the School's website, <http://www.reeds.surrey.sch.uk/School-Policies>.

12. Queries and complaints

12.1 Any comments or queries on this policy should be directed to the Privacy Officer, at privacyofficer@reeds.surrey.sch.uk

12.2 If an individual believes that the School has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the School complaints procedure and should also notify the Privacy Officer. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns/>, although the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.

Compiled by: Privacy Officer	Revision Number: 3 (Summer Term 2020)
	Next Revision date: Summer Term 2021