

# How we use your information

(Privacy notice for parents and pupils)



## **1 Introduction**

- 1.1 The Godolphin & Latymer School Foundation, in its capacity as trustee of the Godolphin and Latymer School (together the "School"), is a Data Controller for the purposes of Data Protection Law<sup>1</sup>.
- 1.2 This notice is intended to provide information about how the School will use or 'process' personal data about pupils and their parents, carers or guardians (referred to in this notice as 'parents'). It 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. It also applies in addition to the School's Terms and Conditions and relevant policies made available to parents and pupils.
- 1.3 The Bursar, supported by the Assistant Bursar (Compliance), is responsible for data protection within the School. She will deal with any requests or enquiries regarding the School's uses of your personal data and endeavour to ensure that your personal data is processed in compliance with this notice and Data Protection Law. The Bursar and Assistant Bursar (Compliance) can be contacted via email at [finance@godolphinandlatymer.com](mailto:finance@godolphinandlatymer.com).

## **2 Types of personal data processed by the School**

- 2.1 Personal data is information that identifies you as an individual and relates to you. Personal data processed by us will include by way of example:
  - names, addresses, telephone numbers, e-mail addresses and other contact details;
  - identification documents such as passport or birth certificate;
  - past, present and prospective pupils' academic, disciplinary, admissions and attendance records, work produced in school and examination scripts and marks;
  - employment details and bank details and other financial information, e.g. about parents (or others) who pay fees to the School;
  - records of payments or donations and any anti-money laundering information we are required to collect by law;
  - correspondence with and concerning parents and pupils;
  - information about pupils' physical and mental health and any special needs and about any family circumstances that might affect pupils' welfare;
  - biometric information;
  - audio recordings;

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<sup>1</sup> This includes the Data Protection Act 2018, Regulation EU/2016/679 of the European Parliament (the General Data Protection Regulation) and all applicable laws and regulations relating to the processing of personal data.

- 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; and
- images of pupils, and occasionally parents, engaging in school activities, and images captured by the School's CCTV system.

2.2 We may acquire this personal data in a number of ways. Generally, pupils and their parents provide us with personal data about themselves or their family directly. This may be via forms or documents, or in the ordinary course of interaction or communication (e.g. during discussions with staff, via email or through screening or assessment carried out by the School). We may also acquire personal data from third parties including other parents and pupils, other schools, other professionals or authorities working with the parent or pupil, from public authorities or from commercial sources.

### **3 Why the School needs to process personal data**

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

3.2 Some of this processing activity will be necessary in order for the School to fulfil its legal rights, duties and obligations, including those under a contract with parents.

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, and provided it does not involve special or sensitive types of data.

3.4 We expect that the following uses may fall within that category of our, or our school 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 education or spiritual development, career services, school visits and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Maintaining relationships with parents, pupils, alumnae and the school community, including direct marketing or fundraising activity (for more information on this please see the Development Office Privacy Notice on the website);
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law and for staff professional development;
- 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) and, where there has been a suspected misuse, investigate use of the School's IT and communications systems in accordance with the School's Code of Conduct for Pupils' Use of ICT;
- To make use of photographic images, video and/or audio recordings 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 Taking, Storing and Using Images of Children Policy as applicable;
- To enable us to provide a safe and secure environment including the use of health information for the protection of public health, biometric information to register pupils as present on the school site and the use of CCTV in accordance with the School's CCTV policy;
- 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, we will on occasion need to process special category personal data (concerning health, ethnicity, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks on parents hosting exchange students) in accordance with rights or duties imposed on us 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 or public health 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 systems that use biometric data to register pupils and to enable them to make purchases from the tuck shop or borrow books from the school library;
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are SEND, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring, public health and health and safety) and to comply with our legal obligations and duties of care.

#### **4 Access to personal data and sharing with third parties**

- 4.1 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 by the school doctor and school nurses;
  - counselling records held by the relevant counsellor; and
  - pastoral or safeguarding files.
- 4.2 However, a certain amount of any pupil's relevant medical, pastoral and SEN information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.
- 4.3 Occasionally, we may need to share your personal data with third parties, such as:
- individuals or organisations such as sports coaches, exam boards or school visit providers in connection with assessment, learning and extra-curricular activities undertaken by pupils;
  - another organisation, such as a university, to which a pupil or ex-pupil has applied and from which a request for a reference or other information about the pupil has been received;
  - professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
  - government authorities (e.g. DfE, police, the local authority or local health protection team) and appropriate regulatory bodies; and
  - others where required by law or where reasonably necessary for the operation of the School.
- 4.4 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 authorities such as the LADO or police. For further information about this, please view the School's Safeguarding Policy.
- 4.5 We may send your personal data to other countries, including countries outside the EEA, for example in connection with: obtaining or providing references, organising overseas school visits or communicating with you when you are overseas. Your data may also be stored on computer servers based outside the EEA via cloud services such as those provided by Google or Microsoft 365.
- 4.6 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. Wherever possible this is subject to contractual assurances that personal data will be kept securely and only in accordance with the School's specific directions.

## 5 Some specific examples

- 5.1 **Biometric Information:** We use a fingerprint identification system to register pupils as present on the School site, to record if lunches are taken and to allow pupils to make purchases from the tuck shop. This biometric information may only be processed with

consent. If consent is not given, a pin number will be issued to be used for the same purpose. Once given, consent may be withdrawn at any time.

- 5.2 **CCTV:** We use CCTV recordings for the purposes of crime prevention and investigation and also in connection with our obligation to safeguard the welfare of pupils, staff and visitors to our site. CCTV recordings may be disclosed to third parties such as the police but only where such disclosure is in accordance with Data Protection Law.
- 5.3 **Photographs:** We may use photographs (and occasionally other media such as video or sound recordings) of pupils for identification or for educational purposes or in our publications, including on the school website and on social media, for marketing and promotion purposes. We may also share photographs and other media with third parties for these purposes (for example, for publication in a local or national newspaper). Specific consent will be sought from parents, pupils or both if a photograph is particularly privacy intrusive. Should you wish to limit the use of images of a pupil for whom you are responsible, or would like further information, please contact the Bursar in writing ([finance@godolphinandlatymer.com](mailto:finance@godolphinandlatymer.com)). The School will respect the wishes of parents/carers and pupils whenever reasonably possible.
- 5.4 **Fees:** We may make enquiries of pupils' previous schools for confirmation that all sums due and owing to such schools have been paid. We may also inform other schools or educational establishments to which pupils are to be transferred if any of our fees are unpaid.
- 5.5 **Keeping in touch:** The School may use your contact details to keep you 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.
- 5.6 **Supporting the School:** Unless you object, the School may also contact you 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 it, please contact the Bursar in writing ([finance@godolphinandlatymer.com](mailto:finance@godolphinandlatymer.com)). You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. Please see the Development Office Privacy Notice on the website for more information.
- 5.7 **Alumni:** The Development Office may use the contact details provided by pupils at the time when they leave the School to keep them updated about the activities of the school and inform them of events which may be of interest (e.g. reunions and other school events to which Old Dolphins are invited). Please see the Development Office Privacy Notice on the website for more information.
- 5.8 **Other:** If you have chosen to add your contact details to the 'Parent Directory' on the parent portal, those details will be shared with other parents in your daughter's year group. Your year representative may also use those details to contact you on behalf of the Godolphin and Latymer Parent, Teacher and Friends Association (the PTFA). If you subsequently wish to withdraw your details from the online Parent Directory you can do this at any time but please note that you may also need to contact your class or year representatives directly if you no longer wish to be included in their communications.

## 6 How long we keep personal data

- 6.1 We 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 recommendation is that ordinary pupil files are kept for at least 7 years following departure from the School.
- 6.2 If you have any specific queries about data retention, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Bursar in writing ([finance@godolphinandlatymer.com](mailto:finance@godolphinandlatymer.com)). 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.
- 6.3 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 Your rights under Data Protection Law

- 7.1 You have various rights under Data Protection Law to access and understand personal data about you held and processed 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, but subject to certain exemptions and limitations.
- 7.2 **Information requests:** 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 Bursar.
- 7.3 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 generally one month but fulfilling more complex requests may take longer). Please note that the School will be better able to respond quickly to smaller, targeted requests for information made during term time.
- 7.4 You should be aware that 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).
- 7.5 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. We consider that most pupils from Year 7 upwards will have this level of maturity but all information requests from, on behalf of, or concerning pupils – whether made under subject access or simply as an incidental request – will be considered on a case by case basis.
- 7.6 **Consent:** Where the School is relying on consent as a means to process personal data, you may withdraw this consent at any time (subject to similar age considerations as above). Examples of where we do rely on consent are: the use of biometric data, recording ethnicity for the purposes of diversity monitoring and certain types of use of images. Please be aware however that the School may not be relying on consent but 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 notice, or may otherwise exist under some form of contract or agreement with you.

## **8 Whose rights?**

- 8.1 Rights under Data Protection Law belong to the individual to whom the data relates. However, 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. Parents and pupils should be aware that this is not necessarily the same as the School relying on strict consent.
- 8.2 Where consent is required, it may in some cases be necessary or appropriate 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.
- 8.3 In general, the School will assume that pupils' consent is not required for ordinary disclosure of their personal data to their parents, unless, in the school's opinion, there is a good reason to do otherwise. 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.

## **9 Data accuracy and security**

- 9.1 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. Please notify the Registrar of any significant changes to important information, such as your contact details.
- 9.2 You have the right to request that any out-of-date, irrelevant or inaccurate or information about you is erased or corrected (subject to certain exemptions and limitations under Data Protection Law).
- 9.3 The School will 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. All staff and governors will be made aware of their duties under Data Protection Law and receive relevant training.

## **10 Further information and guidance**

- 10.1 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.
- 10.2 If you believe that the School has not complied with this privacy notice, or has acted otherwise than in accordance with Data Protection Law, you should notify the Bursar in writing via [finance@godolphinandlatymer.com](mailto:finance@godolphinandlatymer.com). You can also use the School's Complaints Procedure (available on the website). You are also entitled to 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 the regulator.