

Privacy Notice for Parents and Pupils

(How we use your Information)



Reviewed by: Bursar, July 2026

Next review by: July 2027

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 Law¹.
- 1.2 This Notice explains how the School collects, uses and processes personal data about pupils and their parents, carers or guardians (referred to in this Notice as ‘parents’). It applies alongside any other privacy 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 Head of Legal and Compliance, is responsible for overseeing data protection within the School. They will deal with any requests or enquiries about how the School’s processes Personal Data and endeavour to ensure that personal data is processed in accordance with this Notice and Data Protection Law. The Bursar and Head of Legal and Compliance can be contacted via email at DPOfficer@godolphinandlatymer.com.

2 Types of Personal Data Processed by the School

- 2.1 Personal data means any information relating to a living individual who can be identified, either directly or indirectly. Personal data processed by the School will include, by way of example:
- names, addresses, telephone numbers, email addresses and other contact details;
 - identification documents such as passports or birth certificates;
 - former, current and prospective pupils’ academic, disciplinary, admissions and attendance records;
 - pupils’ work, 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 the School are required to collect by law;
 - correspondence with and concerning parents and pupils;
 - information about pupils’ physical and mental health and any special educational needs or disabilities and about any family circumstances that might affect pupils’ welfare;
 - biometric information;
 - audio recordings;
 - 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

¹ Data Protection Law includes the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and any other applicable data protection and privacy legislation in force from time to time.

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

2.2 The School may collect Personal Data in a number of ways. Generally, pupils and their parents provide the School 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). The School may also collect Personal Data from third parties including other parents and pupils, other schools, other professionals or authorities working with the parent or pupil, public authorities or commercial sources.

3 Why the School needs to Process Personal Data

3.1 In order to carry out its duties to pupils and parents, the School needs to process a wide range of Personal Data as part of its daily operations.

3.2 The School processes Personal Data where necessary to perform its contract with parents or to comply with its legal obligations.

3.3 The School may also process Personal Data where necessary for its legitimate interests or those of another person, provided those interests are not overridden by the individual's interests, rights or freedoms. Particular care will be taken where the Personal Data relates to a pupil. Where appropriate, the School may also rely on consent, vital interests or the performance of a task carried out in the public interest.

3.4 The purposes for which the School processes Personal Data include:

- To select pupils and 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;
- To maintain relationships with parents, pupils, alumnae and the school community, including direct marketing or fundraising activities. For more information, please see the Development Office Privacy Notice available on the School's website;
- To carry out management planning and forecasting, research and statistical analysis, including where required or permitted by law and to support 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 former, current and prospective pupils including relating to outstanding fees or payment history, to or from any educational institution that the pupil attended or may attend and to provide references to potential employers of former pupils;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other pupil achievements;
- To safeguard pupils' welfare and provide appropriate pastoral care;
- To monitor where appropriate, use of the School's IT and communications systems in accordance with the School's Safeguarding (Child Protection), Online Safety and Behaviour Policies;

- To use 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;
- To provide a safe and secure environment including by processing health information to protect public health, using biometric information to register pupils as present on the school site, enable pupils to make purchases from the tuck shop, borrow books from the School library and using CCTV in accordance with the School's CCTV Policy;
- To carry out or cooperate with any internal or external complaints, disciplinary or investigation process; and
- To obtain appropriate professional advice and insurance for the School, and for other purposes reasonably necessary for the operation of the School.

3.5 In addition, the School may process Special Category Personal Data, (including information about health, racial or ethnic origin, biometric data used for identification, religious or philosophical beliefs, trade union membership, genetic data, and information about a person's sex life or sexual orientation) and Personal Data relating to criminal convictions and offences (such as when carrying out DBS checks on parents hosting exchange students) where permitted by Data Protection Law, including where necessary to comply with the School's legal obligations, safeguard pupils or, where appropriate, where explicit consent has been obtained. This 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 or other relevant information where necessary to protect the individual's interests. This may include obtaining medical advice, social or public health protection, safeguarding, cooperation with the police or social services, insurance purposes or informing caterers about relevant dietary or medical needs;
- to provide educational services in the context of any special educational needs or disabilities 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 internal or external complaint, disciplinary or investigation process that involves such data, for example where 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 the School's legal obligations and duties of care.

3.6 For further information about the School's lawful bases for processing Personal Data and Special Category Personal Data, please see the Data Protection Policy.

4 Access to Personal Data and Sharing with Third Parties

4.1 Personal Data collected by the School will usually remain within the School and will be processed by appropriate individuals to the extent necessary to carry out their roles in accordance with the School's access controls on a 'need to know' basis. Particularly strict access controls apply to:

- 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, relevant medical, pastoral and SEN information will need to be shared with staff more widely where necessary to provide the pupil with appropriate care and education.
- 4.3 Occasionally, the School may need to share your Personal Data with third parties, such as:
- individuals or organisations such as sports coaches, exam boards and awarding bodies 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 former 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, public relations 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 should be aware that the School has legal duties and must follow statutory guidance, including 'Keeping Children Safe in Education', to record and, where appropriate, report safeguarding incidents and concerns. The School may share safeguarding information with relevant authorities, including local authority children's social care, the Local Authority Designated Officer or the police, where required or appropriate. This may include allegations or concerns that have not yet been substantiated where the School considers that sharing the information is necessary and proportionate to safeguard a child or another individual. For further information, please see the School's Safeguarding (Child Protection) Policy.
- 4.5 The School may send your Personal Data to other countries, including countries outside the UK, for example in connection with obtaining or providing references, organising overseas school visits or communicating with you when you are overseas. Your Personal Data may also be stored or accessed on computer servers based outside the UK, including through cloud services such as those provided by Google or Microsoft 365. Where Personal Data is transferred outside the UK, the School will ensure that the transfer is covered by UK adequacy regulations, an approved transfer mechanism or another safeguard permitted under Data Protection Law. You may contact the Bursar or Head of Legal and Compliance for further information about the safeguards used.
- 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. The School requires these providers, through appropriate contractual terms, to process Personal Data securely and only in accordance with the School's documented instructions.

5 Some Specific Examples

- 5.1 **Biometric Information:** The School uses 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. The School will obtain the written consent required by law before processing a pupil's biometric information. The School will not process a pupil's biometric information where a parent objects in writing or the pupil objects or refuses to participate, even where parental consent has been given. Consent may be withdrawn in writing at any time. The School will provide reasonable alternative arrangements, such as the use of a PIN, for pupils whose biometric information is not processed. Further information is available in the School's Biometric Information Notice.
- 5.2 **CCTV:** The School uses CCTV recordings for the purposes of crime prevention and investigation and to safeguard the welfare of pupils, staff and visitors to the School site. CCTV recordings may be disclosed to third parties such as the police where the disclosure is lawful, necessary and proportionate. Further information is available in the School's CCTV Policy.
- 5.3 **Photographs:** The School may take and use photographs, and occasionally other media such as video or sound recordings, of pupils for identification or for educational purposes or in its publications, including on the School website and on social media, for marketing and promotion purposes. The School may also share photographs and other media with third parties for these purposes (for example, for publication in a local or national newspaper). The School will identify an appropriate lawful basis for each use of photographs. Where the School relies on consent, that consent may be withdrawn at any time. Specific consent will be sought before using an image in a particularly privacy-intrusive way. 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 (DPOfficer@godolphinandlatymer.com). The School will respect the wishes of parents/carers and pupils whenever reasonably possible. Further information is available in the School's Taking, Storing and Using Images of Children Policy.
- 5.4 **Online Safety:** The School is required to filter and monitor pupil use of School ICT facilities to help prevent pupils accessing websites which are not permitted or which may cause them harm. The School uses specialist software which seeks to monitor internet use via the School's Wi-Fi and block attempted access to inappropriate websites. It may also flag certain online activities or other use of the School's IT systems that could indicate that a child is at risk of harm. In certain circumstances the School may review a pupil's specific internet search history or their school email where there is good reason to do so, for example, where the School considers that the pupil may be at risk of harm or may have broken school rules.
- 5.5 **Fees:** The School may make enquiries of pupils' previous schools to confirm whether any fees remain outstanding. The School may also inform other schools or educational establishments to which pupils are transferred if any School's fees remain outstanding.
- 5.6 **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. The School will only send electronic direct marketing where this is permitted under Data Protection Law and the Privacy and Electronic Communications Regulations. You may opt out of receiving direct marketing at any time.

- 5.7 **Supporting the School:** Unless you object, the School may also contact by post and email in connection with various school initiatives, including to promote and raise funds for the School and, where appropriate, other worthy causes. The School will only send fundraising or other direct marketing by email where consent has been given or another exception under the Privacy and Electronic Communications Regulations applies. Should you wish to limit or object to any such use, or would like further information about it, please contact the Bursar in writing (DPOfficer@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.
- 5.8 **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). Former pupils may object to receiving these communications at any time. Please see the Development Office Privacy Notice on the website for more information.
- 5.9 **Other:** If you have choose to add 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). You may withdraw your details from the online Parent Directory at any time. However, you may also need to contact your class or year representatives directly if you no longer wish to be included in those communications.

6 How Long the School Keeps Personal Data

- 6.1 The School will retain personal data securely and only for as long as is necessary for the purpose for which it was collected, including to meet the School's legal, regulatory, contractual and safeguarding obligations, and in accordance with the School's Record Keeping Policy and Retention Schedule.
- 6.2 If you have any specific queries about data retention or wish to request that Personal Data which you believe is no longer relevant be erased, please contact the Bursar in writing (DPOfficer@godolphinandlatymer.com). However, please bear in mind that the School will often have lawful and necessary reasons to retain Personal Data even following such a request.
- 6.3 A limited and reasonable amount of information will be kept for archiving purposes, for example, to maintain a historical record of the School and its former pupils.
- 6.4 Where you ask the School not to contact you or object to receiving direct marketing, the School may retain a limited record of your request to ensure that your wishes continue to be respected.

7 Your Rights under Data Protection Law

- 7.1 You have a number of rights in relation to your Personal Data. Depending on the circumstances, these include the right to:
- request access to your Personal Data;
 - ask for inaccurate or incomplete Personal Data to be corrected;

- ask for Personal Data to be erased;
- ask the School to restrict how it processes your Personal Data;
- object to the processing of your Personal Data;
- receive certain Personal Data in a portable format or ask for it to be transferred to another organisation;
- withdraw consent where the School relies on consent; and
- make a complaint about how the School processes your Personal Data.

These rights are subject to certain exemptions and limitations under Data Protection Law.

- 7.2 **Information requests:** You may exercise your rights orally or in writing. Requests should be referred to the Bursar. Requests for access to Personal Data will be handled in accordance with the School's Subject Access Request Procedure.
- 7.3 The School will endeavour to respond to a request as soon as reasonably practicable and within the applicable statutory time limit. This will usually be one month, although the period may be extended where permitted under Data Protection Law. Where the School reasonably requires information to confirm your identity or authority to act for another person, the one-month period will begin when that information is received. Where clarification is reasonably required to identify the Personal Data requested, the response period may be paused until the clarification is received.
- 7.4 The right of access applies to your own personal data. It does not automatically give a parent the right to receive their child's Personal Data. Information relating to another individual may be redacted or withheld where it would not be reasonable to disclose it without that individual's consent. Certain other information may also be exempt from disclosure under Data Protection Law, including confidential references and information recorded by a candidate during an examination.
- 7.5 Pupils may exercise their data protection rights where, in the reasonable opinion of the School, they have sufficient maturity to understand the request they are making. A request made by a parent or another person on behalf of a pupil will be considered on a case-by-case basis. Where the pupil has sufficient maturity to understand and exercise their rights, the School will normally require the pupil's written consent before disclosing their Personal Data to another person. The School will take account of the pupil's maturity, best interests, welfare and privacy when considering the request. Please see the Subject Access Request Procedure for further information, including how the School deals with requests made by parents on behalf of pupils.
- 7.6 **Consent:** Where the School relies on consent as its lawful basis to process Personal Data, you may withdraw consent at any time. Withdrawal will not affect the lawfulness of any processing carried out before consent was withdrawn. Examples of where the School may rely on consent include the use of biometric data, recording ethnicity for diversity monitoring purposes and certain use of images. However, the School may rely on another lawful basis for some processing. Where this is the case, withdrawing consent will not necessarily require the School to stop that processing. The applicable lawful bases are explained in this Notice.

8 Whose Rights?

- 8.1 Rights under Data Protection Law belong to the individual to whom the data relates. The School may communicate with parents and process or share pupils' Personal Data where

this is necessary under its contract with parents, to comply with its legal obligations or for another lawful purpose. This does not mean that a parent automatically has the right to exercise a pupil's data protection rights or receive all of their Personal Data.

- 8.2 Where the School relies on consent, it will consider whether the pupil has sufficient maturity to provide that consent. Depending on the circumstances, consent may be sought from the pupil, a parent or both. Separate statutory requirements apply to the use of pupils' biometric information, as explained in the School's Biometric Information Notice.
- 8.3 The School may share routine academic, pastoral and administrative information with parents where this is lawful and appropriate and will not necessarily rely on the pupil's consent to do so. The School will take account of the pupil's maturity, the nature of the information, the pupil's best interests and any relevant duty of confidentiality. Where a parent requests access to a pupil's Personal Data under Data Protection Law, the School will deal with the request in accordance with the Subject Access Request Procedure. 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 will normally maintain confidentiality unless, in the School's opinion, there is a good reason to do otherwise, including where disclosure is necessary to safeguard the pupil or another person or is otherwise required by law.

9 Data accuracy and security

- 9.1 The School will take reasonable steps 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 ask the School to correct inaccurate Personal Data about you and to complete any incomplete Personal Data. In certain circumstances, you may also ask the School to erase Personal Data which is no longer required, subject to certain exemptions and limitations under Data Protection Law.
- 9.3 The School will take appropriate technical and organisational measures 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 and will let you know about any significant changes.
- 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 may make a data protection complaint to the Bursar, setting out the details of your complaint. Complaints may be sent by email to DPOfficer@godolphinandlatymer.com. The School will acknowledge the complaint within 30 days, take appropriate steps to investigate and respond to it without undue delay, keep the individual informed of the progress of the complaint where appropriate, and notify them of the outcome. If you remain dissatisfied, you may make a complaint to the Information Commissioner's Office (ICO). Further information is available on the ICO's website.