

# PRIVACY NOTICE

## Contents

Introduction .....	3
Statement .....	3
GDPR Contact Person.....	4
Why the School Needs to Process Personal Data .....	4
Types of personal Data processed by the school.....	6
How the school collects data .....	7
Who has access to personal data and who the school shares it with .....	7
How Long We Keep Personal Data .....	8
Keeping in Touch and Supporting the School .....	9
Your Rights .....	9
Whose Rights .....	10
Parent Requests .....	10
Data Accuracy and Security .....	11
Queries and Complaints.....	11

# Introduction

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Eaton House the Manor School (58 Clapham Common North Side, London SW4 9RU)  
Eaton House Belgravia School (3-5 Eaton Gate, London, SW1W 9BA)

Eaton House Schools take their responsibility for using personal information about individuals seriously. The schools' primary reason for collecting, using and sharing personal information is to provide educational services to the children enrolled in the school.

Personal information is any information that identifies an individual and is related to them.

The schools collect and process personal and sensitive data and are committed to safeguarding the individual's privacy and protecting the personal data collected.

As the data controller, Eaton House Schools, follows the UK General Data Protection Regulations (GDPR) 2018.

# Statement

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This policy provides information about how the school will process an individual's personal data.

Individuals include;

- Staff
- Pupils (current, past and prospective)
- Parents, carers or guardians
- Third parties

This information is provided in accordance with the rights of individuals under the General Data Protection Regulation to understand how their data is used. Staff and parents are all encouraged to read this Privacy Notice and understand Eaton House Schools' obligations to all who it holds personal data for.

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.

The Privacy Notice also applies in addition to the schools' other relevant terms and conditions and policies, including;

- Staff contracts
- Parental contracts
- Third Party contracts

- The schools' retention of records
- The schools' policy on taking, storing and using images of children
- The schools' CCTV policy
- The schools' Safeguarding and Child Protection Policy, including recording of concerns or incidents, pastoral and health & safety policies
- Schools' IT policies.
- Anyone working for or acting on behalf of the school should be aware of and comply with this Privacy Notice and Eaton House Schools' Data Protection policy which provides further information about how an individual's personal data will be used. This includes staff, volunteers, Senior Management, Peripatetic staff and third-party service providers.

## GDPR Contact Person

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The person responsible for data protection and privacy at the school is the Bursar. Day to day, the compliance manager will deal with all requests and enquiries concerning the schools' use of your personal data and endeavour to ensure that all personal data is processed in compliance with this policy and data protection law.

Any questions related to GDPR or issues concerning data protection generally should be addressed to: [compliance@eatonhouseschools.com](mailto:compliance@eatonhouseschools.com) or by post at: Compliance Manager, Eaton House Schools, 58 Clapham Common North Side, London SW4 9RU.

## Why the School Needs to Process Personal Data

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In order to carry out its ordinary duties to staff, pupils and parents, the school needs to process a wide range of personal data about individuals. This includes current, past and prospective staff, pupils and parents as part of the schools' daily operation.

Some of this activity Eaton House Schools will need to carry out in order to fulfil its legal rights, duties or obligations including those under a contract with its staff, or parents of pupils.

Other uses of personal data will be made in accordance with the schools' 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.

Eaton House School expects that the following uses may fall within that category of its legitimate interests;

- For the purposes of pupil selection which includes confirming the identity of prospective pupils and their parents
- To provide education services, including peripatetic musical education, physical education, spiritual development 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 purpose 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 enable relevant authorities to monitor the schools' 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.
- For the purposes of financial donor due diligence, and to confirm the identity of prospective financial donors and their background and relevant interests
- 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 use of the schools' IT and communications systems in accordance with the schools' IT acceptable usage policy
- To make use of photographic images of pupils in school publications, on the school website and on the schools' social media channels in accordance with the schools' policy on taking, storing and using images of children
- For security purposes, including CCTV in accordance with the schools' CCTV policy
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for the schools' purpose, including to obtain appropriate professional advice and insurance for the school

In addition, Eaton House Schools may need to process special category personal data concerning health (including special education needs), ethnicity, religion or criminal records information, such as carrying out DBS checks, in accordance with rights or duties imposed on it by law, including 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 care, 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 e.g. medical services, social services, safeguarding, and cooperation with police or social services, for insurance purposes or to 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 provide spiritual education in the context of any religious beliefs
- In connection with employment of its staff, for e.g. DBS checks, welfare or pension plans
- 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 e.g. child protection, diversity monitoring and health & safety and to comply with its legal obligations and duties of care

## Types of personal Data processed by the school

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This will include by way of example;

- Names, addresses, telephone numbers, e-mail addresses and other contact details
- Bank details and other financial information e.g. about parents who pay fees to the school/Staff for payroll purposes
- Past, present and prospective pupils' academic, disciplinary, admissions and attendance records, special educational needs and examination results and marks
- Where appropriate, information about individuals' health, and contact details for their next of kin
- 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
- Images of pupils and occasionally other individuals engaging in school activities, and images captured by the schools' CCTV system in accordance with the schools' policy on taking, storing and using images of children

## How the school collects data

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Generally, the school receives personal data from the individual directly, in the case of pupils from their parents. This may be through a form which could be collected via the school website or e-mail, 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 e.g. another school or other professionals or authorities working with that individual or collected from publicly available resources.

## Who has access to personal data and who the school shares it with

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As part of Dukes Education, the schools may occasionally share personal information where it is required by Dukes Education.

Occasionally the school will need to share personal information relating to its community with third parties, such as professional advisers, lawyers and accountants or relevant authorities (DFE, Independent Schools Inspectorate, Independent Schools Council, the Charities Commission, HMRC, police or the local authority).

Where pupils take part in educational trips, their personal information may be shared with trip providers. Any information shared with trip providers is always subject to contractual assurances that personal data will be kept securely and only in accordance with the schools' specific directions. For overseas trips this might include passport information to allow flight and other transport bookings. Additional safeguards will be provided to ensure that an appropriate level of protection is in place.

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. Occasionally it will be necessary to share personal data with Senior Management and Governors, such as when a complaint is raised (and in accordance with the School Complaints Procedure, this may also require the involvement of independent panel members). Particularly strict rules of access apply in the context of;

- Medical records held and accessed only by Senior Management, Health and Safety department and/or Governors where appropriate for the purpose of administration of employment.
- Pastoral or safeguarding files

However, a certain amount of any SEND pupil's 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.

Staff, 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 may include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO/MASH or police. For further information about this, please view the schools' Safeguarding and Child Protection Policy.

Low level concerns that do not necessarily meet statutory threshold are also recorded for pastoral reasons.

Finally, in accordance with the General Data Protection Regulation, some of the schools' 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 only in accordance with the schools' specific directions.

## How Long We Keep Personal Data

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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. Staff records are kept indefinite. Pupil records are kept up to twenty-five years and SEND information up to twenty-five years after a pupil has left full time education. However, incident reports and safeguarding files will need to be kept indefinitely, in accordance with specific legal requirements.

If you have any specific queries about how this policy is applied, or wish to request personal data that you no longer believe to be relevant, is considered for erasure, please contact the compliance manager: [compliance@eatonhouseschools.com](mailto:compliance@eatonhouseschools.com). However, please bear in mind that the school may have lawful and necessary reasons to hold on to some data.



# Keeping in Touch and Supporting the School

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Eaton House Schools 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 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.

Should you wish to limit or object to any such use, or would like further information about them, please contact the Compliance Manager by email at [compliance@eatonhouseschools.com](mailto:compliance@eatonhouseschools.com). You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the school may need nonetheless to retain some of your details, not least to ensure that no more communications are sent to that particular address, email or telephone number.

## Your Rights

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Individuals have various rights under the General Data Protection Regulation 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 for the school 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, should put their request in writing to the Compliance Manager, [compliance@eatonhouseschools.com](mailto:compliance@eatonhouseschools.com).

Eaton House Schools 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.

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, nor any confidential reference given by the school for the purposes of the education, training or employment of any individual.

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.

Where the school is relying on consent as a means to process personal data, any person may withdraw this consent at any time. Please be aware however that the school may 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 the individual for example, Employment or parent contract.

## Whose Rights

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The rights under General Data Protection Regulation 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 (if consent is required).

## Parent Requests

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It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about pupils without their consent. The school may consider there are lawful grounds for sharing with or without reference to that pupil.

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, unless, in the schools' opinion, there is a good reason to do otherwise. 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.

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 schools' 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.

## Data Accuracy and Security

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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. In relation to staff, individuals must please notify the HR department of any changes to information held about them. In relation to pupils, parents/carers must update their personal data in the Parent Portal via their personal log-in details. The Data Manager will check and confirm data request change.

An individual has the right to request that any inaccurate or out-of-date information about them is erased or corrected. There are exemptions to this which fall under the law.

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 Senior Management will be made aware of this policy and their duties under the General Data Protection Regulation and receive relevant training.

## Queries and Complaints

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Any comments or queries on this policy should be directed to the Compliance Manager, [compliance@eatonhouseschools.com](mailto:compliance@eatonhouseschools.com).

If an individual believes that the school has not complied with this policy or acted otherwise than in accordance with General Data Protection Regulation, they should utilise the school Complaints Procedure and should also notify their line manager. A complaint can be lodged 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.