

Founded 1642



New Hall School

Whole School Privacy Notice

Reviewed by	Senior Leadership & Management Team
Date	May 2019

PRIVACY NOTICE

HOW WE USE YOUR INFORMATION

1. Introduction

This Privacy Notice is designed to tell you how we use the personal information (also called personal data) we gather about you or your child and what we do with that information. In accordance with the General Data Protection Regulations (GDPR) it needs to be expressed in clear, intelligible and plain language; if you need any help interpreting any part of the Privacy Notice please contact the person named below.

This Privacy Notice is intended to cover the activities of New Hall School, New Hall Voluntary Service, New Hall Parents' Association, New Hall Association, New Hall Multi Academy Trust and New Hall School Enterprises Ltd.

Anyone who works for, or acts on behalf of, the School (including staff, volunteers, governors and service providers; *all of whom should read the information directed to staff for the purposes of this Privacy Notice*) should be aware of how this Privacy Notice applies to them and also that they are expected to comply with the statements detailed here.

Parents should be aware that students who have turned 13, those in Year 8 and above, are deemed to have sufficient maturity to exercise their own personal data rights.

2. About us

New Hall School is a Diamond Model independent day and boarding school. The School is a registered charity (registration no. 1110286). For the purposes of Data Protection legislation, the School is the Data Controller and other persons (Parents, Students, Staff, Alumni, and Visitors) are Data Subjects. For ease of reading, this Privacy Notice will refer to the School as 'we' and 'us', to parents, carers and guardians as 'parents' and to any individual aged 13 and above as 'you'.

If you would like to contact us about your personal information you can contact our Data Protection Lead by post, email or telephone (please find the details below).

Mr Julius Sidwell, Vice Principal
New Hall School, The Avenue, Boreham, Chelmsford, Essex, CM3 3HS
Telephone: 01245 467 588 Email: DataProtectionCompliance@newhallschool.co.uk

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3. The personal information we collect

Data Protection regulations identify personal data as any information that identifies you as an individual. We collect this information throughout your association with the School, and sometimes beyond (for example, if you are a member of the alumni association). This information includes:

For all stakeholders:

- names, addresses, date of birth, telephone numbers, email addresses and other contact details;
- nationality, language, country of birth;
- car details (for those who use our parking facilities);
- bank details and other financial information (for payment of fees and other bills, to pay staff and any service providers and for alumni association business);
- past, present and prospective students' academic, pastoral, disciplinary, admissions, attendance records (including any information regarding Special Educational Needs and Disabilities, or SEND, and child protection documentation) and examination scripts and marks;
- where appropriate information about your health, any treatment received (e.g. by the Health Centre, Welfare centre or first aider) and the contact details for your next of kin;
- images of you engaging in school activities, including those taken for the purpose of education and/or sport, musical or dramatic performance;
- images captured by the School's CCTV system that are used in accordance with the School's policies on the use of CCTV and the taking, storing and using of images of children;
- Alumni information, such as where students go when they leave the School;
- references given or received by the School about students or staff, including any information received by previous educational establishments, or employers, and any other professional organisations.

Also for staff:

- other personal data such as your national insurance number, employment contracts, remuneration details, qualifications, absence information and trade union membership (should you choose to provide us with this information).

Also for Alumni:

- your communication preferences;
- family and details of any partner/spouse;
- professional activities, employment, including work contact details;
- information you have publically shared on social media platforms;
- donation history, such as amount, purpose, date, method of payment;
- tax status and Gift Aid declarations;
- event attended and tickets purchased;
- Alumni website activity and any interactions with emails we send;
- relationships and contact with other Alumni, clubs societies or other connections with the School, including any volunteering activities;
- assessment of your ability and willingness to make donations, including considerations of income and other wealth.

4. How and why we collect this information

We ask for the majority of personal information directly when you join or enter into association or contract with the School. We ask that you inform us of any changes throughout your interactions with us. We may also ask for additional information during your time at the School, for example in email communications, written assessments or trip permissions. We may also receive information about you from a previous educational provider, former employer, local authority, appropriate body and/or the Department for Education (DfE).

In addition, information pertaining to Alumni is gathered via the leavers' form, online registration, at events, when making donations, update forms, verbally, from contact within the community, social media and networking websites. Information pertaining to NHVS guests or service users is gathered via contact forms, verbally and from referrals of appropriate bodies.

We collect this information so we can operate the legitimate business interests of the School and ensure that we are providing the best possible standard of education and care to the students entrusted to us. In addition, in order to carry out our ordinary duties to staff, students, parents and other stakeholders, we will need to process a wide range of personal data about individuals (including, but not limited to, current, past and prospective staff, students or parents) as part of our daily operation.

Also for all stakeholders, this enables us:

- to comply with our legal obligations, for example in the Safeguarding of students;
- to make use of photo and video images in school publications, on the website and (where appropriate) on the School's social media channels;
- to monitor use of our IT and communications systems in accordance with our policies;
- to make provision for safety and security, including the use of CCTV;
- to manage the planning and forecasting, research and statistical analysis, including those imposed or provided for by law (such as diversity or gender pay gap analysis and taxation records);
- to obtain appropriate professional advice and insurances for the School;
- to maintain relationships with the School community, including direct marketing or fundraising activity;
- to maintain relationships with you regarding educational provision, organisation of school trips (we will use various platforms for this, such as ParentMail, Firefly, Clarion Call, telephone calls, email and the like);
- to assess the quality of our care and educational provision, including student and parent satisfaction;
- to allow relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;
- to facilitate the transfer of references between educational establishments or employers;
- to secure funding for the School or on behalf of individuals;
- to maintain an historic archive;
- to comply with the law regarding the sharing of data;
- to act in the purposes of donor due diligence, and to confirm the identity of prospective donors and their backgrounds in accordance with UK law;
- to maintain relations with alumni and the School community, including direct marketing or fundraising.

Also for students and parents, this enables us:

- to process any application through Admissions to admit students to the School;
- to deliver and support students in all aspects of their education and learning, including, but not limited to: academic, musical, physical, creative and spiritual development and career services, co-curricular activities and SEND;
- to monitor and report on students' progress;
- to provide appropriate pastoral care and to safeguard students;
- to provide healthcare to students as required and to care for their mental and physical well-being;
- to facilitate our students' entry in national or other assessments, and to publish the results of public examinations or other achievements of the students.

Also for staff, this enables us:

- to process information in accordance with your employment contract or volunteer application

Also for Alumni and Volunteers, this enables us:

- to provide you with information and news about developments, events and activities;
- to send you publications, e-newsletters, invitations to events and details of volunteering opportunities;
- to further our charitable objectives, including to help us raise funds;
- to process any donations made with respect to Gift Aid;
- to keep a record of any donations made by you;
- to keep a record of any events attended by you.

5. The Legal basis for collection & your consent

The use of your personal information for the purposes outlined above is lawful where it is necessary for us to process your data for legitimate interests, except when this could be deemed to be unfair to the individual. Legitimate interests would include, but are not limited to:

- safeguarding students' welfare and provide appropriate pastoral care;
- providing, where necessary, appropriate medical care to the individual;
- taking action in an emergency, incident or accident, including the disclosing of details of an individual's medical condition where it is in the individual's interests to do so (i.e. for medical advice, social services, for insurance purposes or to organisers of school trips and educational visits);
- providing educational services in the context of any special educational needs of a student;
- conducting DBS checks for staff and volunteers;
- running any systems, including any which use biometrics, for security purposes;
- Complying with legal and regulatory purposes (i.e. child protection, health & safety, gender pay gap reporting, working patterns and diversity monitoring) and with any legal obligations and duties of care;

In addition, the School may need to process special category personal data (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law.

5.1 Consent

The School does not usually need consent to process your data in this way and may indeed have a lawful reason to process your information even without your consent. That reason will usually have been asserted in this Privacy Notice, or may exist under some form of contract or agreement, including; employment, parent contract, purchase of goods, services, request of membership of an organisation such as an alumni or parents' association.

At other times, when the School is relying on your consent to process your personal data you may withdraw this consent at any time. Parents should be aware that consent can be given directly by their child when they are deemed to be of appropriate age, as mentioned in the introduction.

6. How long we keep the information for

The School has necessary and lawful reasons to hold on to some information for longer than you might think. Typically, the legal recommendation for how long to keep ordinary staff and student files is up to 7 years following departure from the School (or until the student turns 25 years of age). Certain data concerning SEND may be retained until the student turns 35 years of age. Incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements. Some information may be used in Archiving the history of the School and relations with you, as our Alumni, will continue once you have left the School (unless you choose not to join the Alumni Association). The School will retain all data securely and only for as long as is legitimate and lawful. If you have any specific concerns regarding the retention of your data or wish to request that any data you believe to be no longer relevant is considered for erasure then please contact the Data Protection Lead named at the start of this Privacy Notice. However, please be mindful that such requests should be proportionate and that the School may have lawful and necessary reasons to retain some data.

7. Who we share the information with

For the most part, personal data collected by the School will remain within the School and will be accessed only by appropriate personnel in accordance with access protocols (i.e. a 'need to know' basis). Particularly strict rules of access apply in the context of medical records, pastoral or safeguarding files and financial information. However, a certain amount of a student's SEND data will need to be distributed more widely in the context of providing the necessary care and education required by the student. It may also be necessary to share SEND data with third parties at certain times, namely for any inspection of appropriate access arrangements in public examinations. Student files may also require to be transferred to other educational providers in the case of a student leaving New Hall. When this is within the EYFS, this may include the transfer of the child's Tapestry online learning journal.

The School will need to share relevant data relating to its community with third parties, such as professional advisers (lawyers, accountants, insurers etc.) and relevant authorities (HMRC, DfE, UK Visas and Immigration, examination boards, police or the local authority). Third parties, such as IT software providers, web developers or cloud storage providers, carry out some of our processing activity and this is always subject to contractual assurances that personal data will be kept securely and in accordance with the School's instructions. We do not normally transfer information to a country that is outside the European Economic Area, excepting if parents live overseas or if an individual moves to a new educational provider or employer abroad. If this happens then we will put security checks in place to ensure a safe transfer of data.

For staff we may also share your data, including details of your salary (for example, to support a mortgage application or where you have decided to become part of a salary sacrifice scheme for childcare vouchers, Cycle to Work Scheme or similar) but you will know about this in advance as you would have provided our contact details in anticipation of this.

You are reminded that the School is under duties imposed by law and statutory guidance 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 or police. For further information on this please refer to the School's Safeguarding Policy.

8. Data accuracy and security

The School will endeavour to ensure that all personal data about you is as up to date and accurate as possible. You must notify the relevant department (e.g. Admissions, Finance, Human Resources) of any significant changes to important information, such as contact details, held about you. You have the right to request that any out-of-date, irrelevant or inaccurate information about you is corrected or erased; however, please be mindful that such requests should be proportionate and that the School may have lawful and necessary reasons to retain some data.

The School will take appropriate steps, both technical and organisational, to ensure the security of personal data about you, including policies around the use of technology and devices, and access to school systems. All staff and governors will be made aware of this Privacy Notice, their duties under the GDPR and will receive relevant training.

9. Staff Salary Confidentiality

Please note that it is New Hall's policy that employees' salaries should remain strictly confidential between the employee, the Remuneration Committee and the relevant members of the Finance Department. Staff are prohibited from sharing their salary details with other employees at New Hall School. The School does not consider it acceptable for a member of staff to ask another New Hall employee about their salary.

In addition, in the case of a bursary or scholarship awarded to a staff child, the value and terms of the award shall remain strictly confidential between the parents (and the student) and the School. In the case of a bursary, parents and students are required to keep the offer of an award, as well as its actual value, confidential.

10. Updates to this Privacy Notice

The School will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be communicated to you directly as far as is reasonably practicable.

11. Requesting access

Under Data Protection Legislation you have the right to request access to information held about you. The School will endeavour to respond to any such requests as soon as is reasonably possible and certainly within the statutory time-limits. The School will be better able to respond to

proportionate, targeted requests for information. If a request is manifestly excessive, unfounded or similar to previous requests the School may ask you to reconsider, to specify or to exclude some, or all, aspects of the data requested. You should also be aware that in some circumstances there may be a proportionate charge, but only where applicable by Data Protection Law. Although requests can be made verbally it would be helpful if you made them in writing to:

Mr Julius Sidwell, Vice Principal
New Hall School, The Avenue, Boreham, Chelmsford, Essex, CM3 3HS
Telephone: 01245 467 588
Email: DataProtectionCompliance@newhallschool.co.uk

Parents are reminded that any child who has reached the age of 13 is deemed sufficiently mature to submit a request for their own data and that any such data belongs to them.

12. Your rights

You have the right to:

1. be informed whether we have any data on you and what we are doing with it;
2. ask us for a copy of the information we have about you and provided that we are satisfied that you are entitled to a copy and your identity has been confirmed then we will supply the information subject to any applicable exemptions;
3. ask us to correct any information we have about you if you think it is wrong;
4. ask us to erase information about you (although we may have good reasons why we cannot do this);
5. ask us to limit what we are doing with your information;
6. ask us to transfer your information to another organisation in format that makes it easy for them to use
7. object to what we are doing with your information;
8. have your data processed by a human being rather than an automated service.

13. Useful contacts

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
www.ico.org.uk

Telephone: 0303 123 1113 (at local rate) or +44 1625 545 700 (for calls from outside the UK)

If you would like to discuss anything in this Privacy Notice, please contact:

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