

# PRIVACY NOTICE



## I. INTRODUCTION

Sussex House School (“the School”) is a company limited by guarantee, registration number 2884794, and is a charity, and our registered charity number is 1035806. We take our responsibilities as a data controller seriously and are committed to using the personal data we hold in accordance with the law.

This privacy notice provides detailed information about how we process personal data. Please read it carefully and, if you have questions regarding your personal data or its use, please contact the Data Protection Controller by email on [data@sussexhouseschool.co.uk](mailto:data@sussexhouseschool.co.uk); by telephone on 020 7584 1741; or, by post at Data Enquiries, Sussex House School, 68 Cadogan Square, London SW1X 0EA.

## 2. TYPES OF PERSONAL DATA WE PROCESS

We process personal data about prospective, current and past pupils and their parents, staff, suppliers and contractors and other individuals connected to or visiting the School.

The personal data we process takes different forms. It may be factual information, expressions of opinion, images or other recorded information which identifies or relates to a living individual. Examples include:

- names, addresses, telephone numbers and e-mail addresses;
- family details (*e.g. who has parental responsibility or others who look after a pupil*);
- admissions, academic, disciplinary and other education related records (*e.g. special educational needs, reports, references, examination scripts and marks*);
- education and employment information;
- images, audio and video recordings (*e.g. photography and recording of events, productions and sports*);
- financial information (*e.g. for making and receiving payments*);
- courses, meetings or events attended.

As a school, we need to process **special category personal data** (e.g. concerning health, ethnicity, religion or sexual life) and **criminal records information** about some individuals (particularly DBS checks). We do so in order to carry out our obligations under applicable law (including with respect to safeguarding or employment) or by explicit consent.

## 3. COLLECTING, HANDLING AND SHARING PERSONAL DATA

We collect most of the personal data we process directly from the individual concerned (or in the case of pupils, from their parents). In some cases, we collect data from third parties (for example, referees, previous schools, the Disclosure and Barring Service, or professionals or authorities working with the individual) or from publicly available resources.

Personal data held by us is processed by appropriate members of staff for the purposes for which the data was provided. We 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. We do not transfer personal data outside of the European Economic Area unless we are satisfied that the personal data will be afforded an equivalent level of protection.

In the course of school business, we share personal data (including special category personal data where appropriate) with third parties such as the school doctor, the school’s professional advisors and relevant

authorities (e.g. the Local Children Safeguarding Board, DBS, NCTL, UK Visas and Immigration, HM Revenue and Customs, Department for Education and Pension providers). We share personal data for the purposes of making travel arrangements for school trips. Some of our systems are provided by third parties, e.g. hosted databases, the school website, or cloud storage providers. Where possible, this is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions.

We do not otherwise share or sell personal data to other organisations for their own purposes.

#### **4. PURPOSES FOR WHICH WE PROCESS PERSONAL DATA**

We process personal data to support the School's operation as an independent preparatory school for boys aged 8 – 13, and in particular for:

- **The selection and admission of pupils;**
- **The provision of education to pupils** including the administration of the school curriculum and timetable, monitoring pupil progress and educational needs, reporting on the same internally and to parents, administration of pupils' entries to secondary school examinations, reporting upon and publishing the results, providing references for pupils (including after a pupil has left);
- **The provision of extra-curricular educational activities to pupils** including music and sports, which may include monitoring and reporting on pupil progress, and administration of pupils' entries to external examinations or competitions, and reporting upon and publishing the results;
- **The provision of educational support and related services to pupils** (and parents) including the maintenance of discipline, administration of sports fixtures and teams, administration of school trips, provision of the school's IT and communications system and technical learning environment (and monitoring the same) all in accordance with our IT policies;
- **The safeguarding of pupils' welfare and provision of pastoral care, welfare, health care services** by school staff;
- **Compliance with legislation and regulation** including the preparation of information for inspections by the Independent Schools Inspectorate, submission of annual census information to each of the Independent Schools Council and Department for Education, the preparation of statutory financial information for Audit, and annual returns to Companies House and the Charity Commission;
- **Operational management** including the compilation of pupil records, the engagement of suppliers and administration of invoices, the administration and management of school fee accounts, the management of School property, the management of security and safety arrangements (including monitoring of the school's IT and communications systems in accordance with our Acceptable Use Policy), management analysis and planning; the administration and implementation of the School's rules and policies for pupils and staff and other operational purposes;
- **Staff administration** including the recruitment of staff / engagement of visiting staff (including compliance with DBS procedures), administration of payroll and pensions, review and appraisal of staff performance; conduct of any grievance, capability or disciplinary procedures and the maintenance of appropriate human resources records for current and former staff and providing references;
- **The promotion of the School** through its own website, and other publications and communications; and
- **Maintaining relationships with Old Cadogans and the wider school community** by communicating with the body of current and former pupils and/or their parents or guardians and organising events.

The processing set out above is carried out to fulfil our legal obligations (including those under our parent contract and staff employment contracts). We also expect these purposes to form our legitimate interests.

## **5. FUND-RAISING AND KEEPING IN TOUCH**

Our fundraising takes place primarily in connection with school events, which are supported by members of the school community.

We keep in touch with our alumni, the Old Cadogans, by sending invitations by post, to events of interest.

## **6. HOW LONG WE KEEP PERSONAL DATA**

We retain personal data only for a legitimate and lawful reason and only for so long as necessary or required by law. We have adopted Records Retention Guidelines which set out the time period for which different categories of data are kept. Currently we retain all boy files given the ongoing Independent Inquiry into Child Sexual Abuse. If you have any specific queries about our record retention periods, or wish to request that your personal data is considered for erasure, please contact the Data Protection Controller.

## **7. YOUR RIGHTS**

You have various rights under Data Protection Law to access and understand the personal data we hold about you, and in some cases to ask for it to be erased or amended or for us to stop processing it, but subject to certain exemptions and limitations.

You always have the right to withdraw your consent, where specifically given. 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 exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because of a purchase of goods or services).

If you would like to access or amend your personal data, or would like it to be transferred to another person or organisation, or have some other objection to how your personal data is used, please make your request in writing to [data@sussexhouseschool.co.uk](mailto:data@sussexhouseschool.co.uk).

We will 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. We will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, we may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows it.

You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal privilege. We are 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.

## **8. PUPIL DATA**

The rights under Data Protection legislation belong to the individual to whom the data relates. However, we will often rely on parental consent to process personal data relating to pupils (if consent is required) unless, given the nature of the processing in question, and the pupil's age and understanding, it is more appropriate to rely on 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.

In general, we 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 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, we may be under an obligation to maintain confidentiality unless, in our 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 is required by law.

Pupils can make subject access requests for their own personal data, provided that they have sufficient maturity to understand the request they are making. A person with parental responsibility will generally be entitled to make a subject access request on behalf of pupils, but the information in question is always considered to be the child's at law. A pupil of any age may ask a parent or other representative to make a subject access request on their behalf. Moreover (if of sufficient maturity) their consent or authority may need to be sought by the parent making such a request. We would typically (but not necessarily) expect pupils with sufficient maturity to include, but not be limited to boys in the VIth Form.

## **9. CHANGE OF DETAILS**

We try to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Please notify [data@sussexhouseschool.co.uk](mailto:data@sussexhouseschool.co.uk) of any significant changes to important information, such as contact details, held about you.

## **10. THIS POLICY**

Our privacy notice should be read in conjunction with our other policies and terms and conditions which make reference to personal data, including our Parent Contract, our Child Protection and Safeguarding Policy, Health & Safety Policies and Acceptable Use Policy.

**We will update this Privacy Notice from time to time. Any substantial changes that affect how we process your personal data will be notified on our website and to you directly, as far as practicable.**

If you believe that we have not complied with this policy or have acted otherwise than in accordance with Data Protection Law, you should notify the Data Protection Controller. You can also 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 us before involving them.

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