

# Newland House School



## PRIVACY POLICY

**This Policy applies to all sections of the school  
including the Early Years Foundation Stage.**

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<b>Policy owner:</b>	<b>Finance and Operations Manager</b>
<b>Authorised by:</b>	<b>David Alexander, Head</b>
	<b>Governing body</b>

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## 1. Introduction

- 1.1 Newland House School is committed to managing personal data securely and lawfully in compliance General Data Protection Regulations (GDPR) and is fully aware of its obligations and the rights of individuals with regard to personal data.
- 1.2 This Privacy Policy provides stipulates how the school will use personal data about individuals including: its staff; its current, past and prospective pupils; and their parents.
- 1.3 This information is provided because Data Protection law gives individuals rights to understand how their data is used. Staff, parents and pupils are all encouraged to read this Privacy Policy and understand the school's obligations to its entire community.
- 1.4 This **Privacy Policy** 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.
- 1.5 Parents, pupils, staff and governors should note the relevant annex at the end of this Policy and staff should be familiar with the stand-alone Staff Privacy Notice (this includes self-employed individuals who work in the school).
- 1.6 This **Privacy Policy also** applies in addition to the school's other relevant terms and conditions and policies, including:
  - any contract between the school and its staff or the parents of pupils;
  - the school's policy on taking, storing and using images of children (Digital Image Policy);
  - the school's CCTV Policy (Digital Strategy Policy);
  - the school's retention of records policy (Data Protection Policy);
  - the school's Safeguarding and child protection policy, Code of Conduct policy, Staff Handbook and Health and Safety policy, including as to how concerns or incidents are recorded; and
  - the school's IT policies (Digital Strategy policy, Digital Image Policy).

## 2. Responsibility for data protection

- 2.1 The School has appointed the Finance and Operations Manager as the Data Controller who will be the first point of contact for all requests and enquiries concerning the school's uses of your personal data: [garthur@newlandhouse.net](mailto:garthur@newlandhouse.net).

### 3. Why the school needs to process personal data

- 3.1 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 (including current, past and prospective staff, pupils or parents) as part of its daily operation.
- 3.2 Some of this activity the school 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 its pupils.
- 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 The school expects that the following uses will fall within that category of its **“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 training or spiritual development, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
  - Maintaining relationships with the school community, including direct marketing;
  - For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests;
  - For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
  - 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) use of the school's IT and communications systems in accordance with the school's Digital Strategy policy;

- To make use of photographic images 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 Digital Image policy on taking, storing and using images of children;
- For security purposes, including CCTV in accordance with the school's Data Protection 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, the school will on occasion 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, including as regards safeguarding and employment, 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 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;
- In connection with employment of its staff, for example DBS checks, welfare, union membership or pension plans;
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are SEN, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

## **4. Types of personal data processed by the school**

4.1 This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);

- bank details and other financial information, for example, about parents who pay fees to the school;
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special or medical needs), and examination scripts and marks;
- personnel files, including in connection with academics, employment or safeguarding;
- where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- references given or received by the school about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- correspondence with and concerning staff, pupils and parents past and present; and
- images of pupils (and occasionally other individuals) engaging in school activities, and images captured by the school's CCTV system (in accordance with the school's policy on taking, storing and using images of children);

## **5. How the school collects data**

5.1 Generally, the school receives personal data from the individual directly (including, in the case of pupils, from their parents). This may be via a form, on-line form or simply in the ordinary course of interaction or communication (such as email or written assessments). Parents attention is drawn to the school's Website Terms & Conditions in respect of data submitted via online forms.

5.2 However, in some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities working with that individual); or collected from publicly available resources

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

- 6.1 Occasionally, the school will need to share personal information relating to its community with third parties, such as:
- professional advisers (for example, lawyers, insurers, PR advisers and accountants);
  - government authorities (for example, HMRC, DfE, police or the local authority); and
  - appropriate regulatory bodies.
- 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 in accordance with express consent; and

- Safeguarding files.

- 6.2 However, a certain amount of any SEN 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.
- 6.3 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 is likely to 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 about this, please view the school's ***Safeguarding and child protection policy***.
- 6.4 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. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the school's specific directions.

## **7. How long we keep personal data**

- 7.1 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. Typically, the legal recommendation for how long to keep ordinary staff personnel files is up to 7 years following departure from the school and for pupils up to the age of 25 or longer if there are SEN records. However, incident reports, safeguarding files and pension details will need to be kept much longer, in accordance with specific legal requirements.
- 7.2 If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Finance and Operations Manager:  
[garthur@newlandhouse.net](mailto:garthur@newlandhouse.net)
- 7.3 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.
- 7.4 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 (called a "suppression record").

- 7.5 Please refer to the school's Retention guidance which can be found in the Data Protection policy for more details.

## **8. Keeping in touch and supporting the school**

- 8.1 The school will use the contact details of parents 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.

## **9. Your rights**

### **Rights of access.**

- 9.1 Individuals have various rights under Data Protection Law 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 have it transferred to others, or for the school to stop processing it – but subject to certain exemptions and limitations.
- 9.2 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 Finance and Operations Manager: [garthur@newlandhouse.net](mailto:garthur@newlandhouse.net)
- 9.3 The school 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 30 days in the case of requests for access to information).
- 9.4 The school will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the school may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

### **Requests that cannot be fulfilled**

- 9.5 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), or information which is subject to legal privilege (for example legal advice given to or sought by the school, or documents prepared in connection with a legal action).

- 9.6 The school is also not required to disclose any pupil examination scripts (or other information consisting solely of pupil test answers), provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the school itself for the purposes of the education, training or employment of any individual.
- 9.7 You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Policy. All such requests will be considered on their own merits.

#### **Pupil requests**

- 9.8 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 (see section **Whose Rights?** below). A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.
- 9.9 While a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger pupils, the law still considers the information in question to be the child's: for older pupils, the parent making the request may need to evidence their child's authority for the specific request.
- 9.10 Pupils aged for example, 13 and above are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home.

#### **Parental requests, etc.**

- 9.11 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.
- 9.12 Parents will in general receive educational and pastoral updates about their children. 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 including the express wishes of the child.

9.13 All information requests from, on behalf of, or concerning pupils – whether made under subject access or simply as an incidental request – will therefore be considered on a case by case basis.

### **Consent**

9.14 Where the school is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Examples where we do rely on consent are for example, biometrics, certain types of uses 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.

### **Whose rights?**

9.15 The rights under Data Protection Law belong to the individual to whom the data relates. However, the school will often rely on parental authority or Policy for the necessary ways it processes personal data relating to pupils – for example, via a form. Parents and pupils should be aware that this is not necessarily the same as the school relying on strict consent (see section on **Consent** above).

9.16 Where consent is required, it may in some cases be necessary or appropriate – given the nature of the processing in question, and the pupil's age and understanding – 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.

9.17 In general, the school will assume that pupils' consent is not required for ordinary disclosure of their personal data to their parents, for example, for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare. That is unless, in the school's opinion, there is a good reason to do otherwise.

9.18 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; for example where the school believes disclosure will be in the best interests of the pupil or other pupils, or if required by law.

9.19 Pupils are required to respect the personal data and privacy of others, and to comply with the school's policies relating to data protection and the school rules. Staff are under professional duties to do the same and are covered under the Staff Privacy Notice.

## **10. Data accuracy and security**

- 10.1 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. Individuals must notify the HR & Compliance Manager in writing of any significant changes to important information, such as contact details, held about them.
- 10.2 An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the school may need to process your data, of who you may contact if you disagree.
- 10.3 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 this policy and their duties under Data Protection Law and receive relevant training.

## **11. This policy**

- 11.1 The school will update this Privacy Policy from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

## **12. Queries and complaints**

- 12.1 Any comments or queries on this policy should be directed to the Finance and Operations Manager in the first instance: [garthur@newlandhouse.net](mailto:garthur@newlandhouse.net)
- 12.2 If an individual believes that the school has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the school complaints or grievance procedure and should also notify the Finance and Operations Manager. 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 the school before involving the regulator.

## **Annex A - Newland House School Privacy Policy**

### **Parents or guardians of children at the school or applying to join the school**

#### **Introduction**

The EU General Data Protection Regulation (GDPR) includes rules on giving privacy information to those whose data is held by an organisation (data subjects). These are more detailed and specific than in the Data Protection Act and place an emphasis on making privacy Policies understandable and accessible. Data controllers are expected to take 'appropriate measures' to ensure that this is the case.

The school interprets this as using very clear language to outline each of the responsibilities for each of the data subject groups.

The GDPR say that the information provided to data subjects about how the school processes their personal data must be:

- concise, transparent, intelligible and easily accessible;
- written in clear and plain language, particularly if addressed to a child; and
- free of charge.

These requirements are about ensuring that privacy information is clear and understandable for data subjects. Our Privacy Policy deals with the overall privacy responsibilities of the school and includes, as annexes the particular policies that apply to parents, pupils under the age of 13, pupils over the age of 13, staff, Governors and alumni.

This annex deals with two sources of data, that obtained directly from the subject and, data not obtained directly from the subject. For both sources the identity and contact details of the data handler (and where applicable, the handler's representative) and the data controller are provided.

#### **Content**

This Privacy Policy will be provided to you at the time your data is being obtained, if it is being obtained directly.

Data will be processed for the purposes of responding to requests for information about joining the school and the school will therefore have a "legitimate interest" for processing basic personal data and sensitive personal data. The data the school holds will be the minimum it requires to form and maintain the contract between you and the school.

The school will share your data with companies who have contracts with the school and who have equalled the school's precautions and systems for dealing with data, for example:

- Catering (Holroyd Howe)
- Photography (Tempest)
- School Insurers (Marsh)

- IT software providers:
  - Microsoft
  - WCBS Financial & Academic Software
  - Firefly Online Learning and Information Platform
  - ParentMail
  - Parent Evening Booking System

The list is not exhaustive and the companies may change from time to time.

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the school organises, should this be envisaged for your child, you will be contacted for your consent, the consent will be limited in time and content if it be required.

The retention period for pupil data will be until the pupil reaches the age of 25, or be modified by any other legal obligation the school finds itself under.

You have the right to withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.

You can complain at any time about how the school has handled your data; the Information Commissioner is available as follows:

ICO helpline is 0303 123 1113. A template letter, should you need it is at Annex A(i).

We will obtain the data the school requires from you; should we need data from other sources we will contact you within a month.

We see the provision of personal data as necessary to properly admit you child to the school and to administer, and for the school to fulfil its obligations under the contract once your child is a pupil here.

There is no automated decision making or profiling involved in this data stream into and through the school.

## Annex A(i)

Mr G Arthur  
The Data Controller  
Newland House School  
Waldegrave Park  
Twickenham  
Middlesex  
TW1 4TQ

[Your full address]  
[Phone number]  
[The date]

[Reference number (if provided within the initial response)]

Dear [Sir or Madam / name of the person you have been in contact with]

### Information rights concern

[Your full name and address and any other details such as account number to help identify you]

I am concerned that you have not handled my personal information properly.

[Give details of your concern, explaining clearly and simply what has happened and, where appropriate, the effect it has had on you.]

I understand that before reporting my concern to the Information Commissioner's Office (ICO) I should give you the chance to deal with it.

If, when I receive your response, I would still like to report my concern to the ICO, I will give them a copy of it to consider.

You can find guidance on your obligations under information rights legislation on the ICO's website ([www.ico.org.uk](http://www.ico.org.uk)) as well as information on their regulatory powers and the action they can take.

Please send a full response within 28 calendar days. If you cannot respond within that timescale, please tell me when you will be able to respond.

If there is anything you would like to discuss, please contact me on the following number [telephone number].

Yours faithfully  
[Signature]

## **Annex B - Newland House School Privacy Policy Children at the school over the age of 13**

### **Introduction**

The EU General Data Protection Regulation (GDPR) includes rules on giving privacy information to those whose data is held by an organisation (data subjects). These are more detailed and specific than in the Data Protection Act and place an emphasis on making Privacy Policies understandable and accessible. Data controllers are expected to take 'appropriate measures' to ensure that this is the case.

The school interprets this as using very clear language to outline each of the responsibilities for each of the data subject groups.

The GDPR say that the information provided to data subjects about how the school processes their personal data must be:

- concise, transparent, intelligible and easily accessible;
- written in clear and plain language, particularly if addressed to a child; and
- free of charge.

These requirements are about ensuring that privacy information is clear and understandable for data subjects. Our Privacy Policy deals with the overall privacy responsibilities of the school and includes, as annexes the particular Policies that apply to parents, pupils under the age of 13, pupils over the age of 13, staff, Governors and alumni.

This annex deals with two sources of data, that obtained directly from the subject and, data not obtained directly from the subject. For both sources the Identity and contact details of the data handler (and where applicable, the handler's representative) and the data controller are provided.

### **Content**

This Privacy Policy will be provided to you at the time your data is being obtained, if it is being obtained directly. This means you get this when the school gets your data from your parents, or within a month.

Data will be processed for the purposes of allowing you to make the best of your time at Newland House School. The school will therefore have what is called a "legitimate interest" for processing basic personal data and sensitive personal data. The data the school holds will be the minimum it requires to allow you to thrive in your years here.

The school will share your data with the following companies who have contracts with the school and who have equalled the school's precautions, systems and procedures for dealing with data, these are:

- Catering (Holroyd Howe)

- Photography (Tempest)
- School Insurers (Marsh)
- IT software providers:
  - Microsoft
  - WCBS Financial & Academic Software
  - Firefly Online Learning and Information Platform
  - ParentMail
  - Parent Evening Booking System

The list is not exhaustive, and the companies may change from time to time.

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the school organises, should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it is required.

The retention period for pupil data will be until you reach the age of 25.

You have the right to withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.

You can complain at any time about how the school has handled your data; the Information Commissioner is available as follows:

ICO helpline is 0303 123 1113. A template letter, should you need it is at Annex B(i).

We will obtain the data the school requires from you; should we need data from other sources we will contact you.

We see the provision of personal data as necessary to properly manage your time at Newland House School and for the school to fulfil its obligations to you.

There is no automated decision making or profiling involved handling this data.

## Annex B(i)

Mr G Arthur  
The Data Controller  
Newland House School  
Waldegrave Park  
Twickenham  
Middlesex  
TW1 4TQ

[Your full address]  
[Phone number]  
[The date]

[Reference number (if provided within the initial response)]

Dear [Sir or Madam / name of the person you have been in contact with]

### **Information rights concern**

[Your full name and address and any other details such as account number to help identify you]

I am concerned that you have not handled my personal information properly.

[Give details of your concern, explaining clearly and simply what has happened and, where appropriate, the effect it has had on you.]

I understand that before reporting my concern to the Information Commissioner's Office (ICO) I should give you the chance to deal with it.

If, when I receive your response, I would still like to report my concern to the ICO, I will give them a copy of it to consider.

You can find guidance on your obligations under information rights legislation on the ICO's website ([www.ico.org.uk](http://www.ico.org.uk)) as well as information on their regulatory powers and the action they can take.

Please send a full response within 28 calendar days. If you cannot respond within that timescale, please tell me when you will be able to respond.

If there is anything you would like to discuss, please contact me on the following number [telephone number].

Yours faithfully  
[Signature]

## **Annex C - Newland House School Privacy Policy**

### **Governors of the school**

#### **Introduction**

The EU General Data Protection Regulation (GDPR) includes rules on giving privacy information to those whose data is held by an organisation (data subjects). These are more detailed and specific than in the Data Protection Act and place an emphasis on making privacy Policies understandable and accessible. Data controllers are expected to take 'appropriate measures' to ensure that this is the case.

The school interprets this as using very clear language to outline each of the responsibilities for each of the data subject groups.

The GDPR say that the information provided to data subjects about how the school processes their personal data must be:

- concise, transparent, intelligible and easily accessible;
- written in clear and plain language, particularly if addressed to a child; and
- free of charge.

These requirements are about ensuring that privacy information is clear and understandable for data subjects. Our Privacy Policy deals with the overall privacy responsibilities of the school and includes, as annexes the particular Policies that apply to parents, pupils under the age of 13, pupils over the age of 13, staff, Governors and alumni.

This annex deals with two sources of data, that obtained directly from the subject and, data not obtained directly from the subject. For both sources the Identity and contact details of the data handler (and where applicable, the handler's representative) and the data controller are provided

#### **Content**

This Privacy Policy will be provided to you at the time your data is being obtained, if it is being obtained directly.

Data will be processed for the purposes of responding to requests for information about joining the Board of the school and the school will therefore have a "legitimate interest" for processing basic personal data and, if necessary, sensitive personal data. The data the school holds will be the minimum it requires.

The school will share your data with the following companies who have contracts with the school and who have equalled the school's precautions, systems and procedures for dealing with data, these are:

- School Insurers: (Marsh)
- IT software providers: Microsoft

The list is not exhaustive, and the companies may change from time to time. It is not necessary for data to be shared with other countries. The exception to this will be international trips that the school organises, should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it is required.

The retention period for data on Governors to be held will be 25 years after the end of their tenure or as detailed in the School's Retention section in the Data Protection Policy.

You have the right to withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.

You can complain at any time about how the school has handled your data; the Information Commissioner is available as follows:

ICO helpline is 0303 123 1113. A template letter, should you need it is at Annex C(i).

We will obtain the data the school requires from you, should we need data from other sources we will contact you first.

We see the provision of personal data as necessary to safeguard you and the school as it will allow the necessary checks to be made.

There is no automated decision making or profiling involved in this data stream into and through the school.

## Annex C(i)

Mr G Arthur  
The Data Controller  
Newland House School  
Waldegrave Park  
Twickenham  
Middlesex  
TW1 4TQ

[Your full address]  
[Phone number]  
[The date]

[Reference number (if provided within the initial response)]

Dear [Sir or Madam / name of the person you have been in contact with]

### **Information rights concern**

[Your full name and address and any other details such as account number to help identify you]

I am concerned that you have not handled my personal information properly.

[Give details of your concern, explaining clearly and simply what has happened and, where appropriate, the effect it has had on you.]

I understand that before reporting my concern to the Information Commissioner's Office (ICO) I should give you the chance to deal with it.

If, when I receive your response, I would still like to report my concern to the ICO, I will give them a copy of it to consider.

You can find guidance on your obligations under information rights legislation on the ICO's website ([www.ico.org.uk](http://www.ico.org.uk)) as well as information on their regulatory powers and the action they can take.

Please send a full response within 28 calendar days. If you cannot respond within that timescale, please tell me when you will be able to respond.

If there is anything you would like to discuss, please contact me on the following number [telephone number].

Yours faithfully  
[Signature]

## **Annex D - Newland House School Privacy Policy**

### **Alumni**

#### **Introduction**

The EU General Data Protection Regulation (GDPR) includes rules on giving privacy information to those whose data is held by an organisation (data subjects). These are more detailed and specific than in the Data Protection Act and place an emphasis on making privacy Policies understandable and accessible. Data controllers are expected to take 'appropriate measures' to ensure that this is the case.

The school interprets this as using very clear language to outline each of the responsibilities for each of the data subject groups.

The GDPR say that the information provided to data subjects about how the school processes their personal data must be:

- concise, transparent, intelligible and easily accessible;
- written in clear and plain language, particularly if addressed to a child; and
- free of charge.

These requirements are about ensuring that privacy information is clear and understandable for data subjects. Our Privacy Policy deals with the overall privacy responsibilities of the school and includes, as annexes the particular Policies that apply to parents, pupils under the age of 13, pupils over the age of 13, staff, Governors and alumni.

This annex deals with two sources of data, that obtained directly from the subject and, data not obtained directly from the subject. For both sources the Identity and contact details of the data handler (and where applicable, the handler's representative) and the data controller are provided

#### **Content**

Routine contact with alumni will be by surface mail, email will only be used as a method of contact if the individual alums gives consent to be contacted in this way.

This Privacy Policy will be provided to you at the time your data is being obtained, if it is being obtained directly.

Should you give consent data will be processed for the purposes of maintaining an accurate record of those who were educated at Newland House School. The school will process only the minimum personal data to achieve this purpose.

The school will not share your data with any companies associated with the school.

It is not necessary for data to be shared with other countries.

The retention period for alumni data will be unlimited as long as the school believes it has a relationship to serve with the alum.

You have the right to withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.

You can complain at any time about how the school has handled your data; the Information Commissioner is available as follows:

ICO helpline is 0303 123 1113. A template letter, should you need it is at Annex D(i).

We will obtain the data the school requires from you, should we need data from other sources we will contact you first.

## Annex D(i)

**Mr G Arthur  
The Data Controller  
Newland House School  
Waldegrave Park  
Twickenham  
Middlesex  
TW1 4TQ**

[Your full address]  
[Phone number]  
[The date]

[Reference number (if provided within the initial response)]

Dear [Sir or Madam / name of the person you have been in contact with]

### **Information rights concern**

[Your full name and address and any other details such as account number to help identify you]

I am concerned that you have not handled my personal information properly.

[Give details of your concern, explaining clearly and simply what has happened and, where appropriate, the effect it has had on you.]

I understand that before reporting my concern to the Information Commissioner's Office (ICO) I should give you the chance to deal with it.

If, when I receive your response, I would still like to report my concern to the ICO, I will give them a copy of it to consider.

You can find guidance on your obligations under information rights legislation on the ICO's website ([www.ico.org.uk](http://www.ico.org.uk)) as well as information on their regulatory powers and the action they can take.

Please send a full response within 28 calendar days. If you cannot respond within that timescale, please tell me when you will be able to respond.

If there is anything you would like to discuss, please contact me on the following number [telephone number].

Yours faithfully  
[Signature]

## **Annex E - Newland House School Privacy Policy**

### **Employees of the school, or applying to join the school**

#### **Introduction**

The EU General Data Protection Regulation (GDPR) includes rules on giving privacy information to those whose data is held by an organisation (data subjects). These are more detailed and specific than in the Data Protection Act and place an emphasis on making privacy Policies understandable and accessible. Data controllers are expected to take 'appropriate measures' to ensure that this is the case.

The school interprets this as using very clear language to outline each of the responsibilities for each of the data subject groups.

The GDPR say that the information provided to data subjects about how the school processes their personal data must be:

- concise, transparent, intelligible and easily accessible;
- written in clear and plain language, particularly if addressed to a child; and
- free of charge.

These requirements are about ensuring that privacy information is clear and understandable for data subjects. Our Privacy Policy deals with the overall privacy responsibilities of the school and includes, as annexes the particular policies that apply to parents, pupils under the age of 13, pupils over the age of 13, staff, Governors and alumni.

This annex deals with two sources of data, that obtained directly from the subject and, data not obtained directly from the subject. For both sources the Identity and contact details of the data handler (and where applicable, the handler's representative) and the data controller are provided.

#### **Content**

This Privacy Policy will be provided to you at the time your data is being obtained, if it is being obtained directly.

Data will be processed for the purposes of responding to requests for information about joining the school and the school will therefore have a "legitimate interest" for processing basic personal data and sensitive personal data. The data the school holds will be the minimum it requires to form and maintain the contract between you and the school.

The school will share your data with the following companies who have contracts with the school and who have equalled the school's precautions and systems for dealing with data, these are:

- Catering (Holroyd Howe)
- Photography (Tempest)

- School Insurers (Marsh)
- IT software providers:
  - Microsoft
  - WCBS Financial & Academic Software
  - Firefly Online Learning and Information Platform
  - ParentMail
- Health care service provider
- DBS Clearance provider

The list is not exhaustive, and the companies may change from time to time.

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the school organises, should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it be required.

The retention period for employee data will be for seven years after the end of the employment relationship. This can be modified by any other legal obligation the school finds itself under.

You have the right to withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.

You can complain at any time about how the school has handled your data; the Information Commissioner is available as follows:

ICO helpline is 0303 123 1113. A template letter, should you need it is at Annex E(i)

We will obtain the data the school requires from you, should we need data from other sources we will contact you within a month.

We see the provision of personal data as necessary to properly employ you at the school and to administer, and for the school to fulfil its obligations under the contract once you are an employee here

There is no automated decision making or profiling involved in this data stream into and through the school.

## Annex E(i)

Mr G Arthur  
The Data Controller  
Newland House School  
Waldegrave Park  
Twickenham  
Middlesex  
TW1 4TQ

[Your full address]  
[Phone number]  
[The date]

[Reference number (if provided within the initial response)]

Dear [Sir or Madam / name of the person you have been in contact with]

### **Information rights concern**

[Your full name and address and any other details such as account number to help identify you]

I am concerned that you have not handled my personal information properly.

[Give details of your concern, explaining clearly and simply what has happened and, where appropriate, the effect it has had on you.]

I understand that before reporting my concern to the Information Commissioner's Office (ICO) I should give you the chance to deal with it.

If, when I receive your response, I would still like to report my concern to the ICO, I will give them a copy of it to consider.

You can find guidance on your obligations under information rights legislation on the ICO's website ([www.ico.org.uk](http://www.ico.org.uk)) as well as information on their regulatory powers and the action they can take.

Please send a full response within 28 calendar days. If you cannot respond within that timescale, please tell me when you will be able to respond.

If there is anything you would like to discuss, please contact me on the following number [telephone number].

Yours faithfully  
[Signature]