

Privacy and Data Protection Policy

Name	Privacy and Data Protection Policy
Regulatory or legal requirement addressed by policy	The General Data Protection Regulation Keeping Children Safe in Education
Policies referred to	
Approved by	Dr Adrian Rainbow (Head)
Policy owned by	Fiona McAllister (Data Protection Officer)
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This Privacy and Data Protection Policy will be reviewed and updated annually or more frequently when there are changes in legislation and/or government guidance.

LONDON PARK SCHOOLS

● CLAPHAM ● MAYFAIR ● SIXTH ● HYBRID

Contents

HOW AND WHY, WE COLLECT AND USE PERSONAL INFORMATION	3
DATA PROTECTION OFFICER	3
SAFEGUARDING AND PROMOTING THE WELFARE OF OUR STUDENTS	4
Supporting children with Special Educational Needs or Disability	
(SEND).....	4
Managing our schools effectively.....	4
STUDENT APPLICATIONS.....	5
FINANCIAL INFORMATION.....	5
PHOTOGRAPHS	6
CCTV	6
<i>Statutory responsibilities</i>	<i>6</i>
<i>Management responsibilities</i>	<i>6</i>
<i>Collection of data</i>	<i>7</i>
<i>Diversity Information</i>	<i>7</i>
COMMUNICATING WITH OUR NETWORK OF ALUMNI.....	7
GENERATING PHILANTHROPIC INCOME.....	7
<i>To understand our customer base and to develop and grow our</i>	
<i>business.....</i>	<i>8</i>
UNDERTAKING DUE DILIGENCE	8
OUR LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION	8
OUR LEGAL BASIS FOR PROCESSING SPECIAL CATEGORIES OF PERSONAL DATA.....	9
ETHNICITY DATA OF STUDENTS.....	9
TRADE UNION MEMBERSHIP	9
BIOMETRIC DATA.....	10
DATA CONCERNING HEALTH.....	10
DATA CONCERNING A PERSON’S SEX LIFE OR SEXUAL ORIENTATION.....	10
CONSENT	11
How long do we keep personal information?	11

London Park Schools Privacy and Data Protection Policy

This notice is provided to help you understand how and why we collect personal information (or “data”) about students and other individuals, and what we do with that information.

We use (or “process”) personal information in accordance with the law relating to data protection. The General Data Protection Regulation (GDPR) outlines your rights in respect of this.

Personal information means any information relating to you, or information that when combined with other information identifies you.

Personal information includes your name, address, email address, CCTV images and photographs and includes online identifiers such as internet protocol (IP) addresses, or cookie identifiers.

HOW AND WHY, WE COLLECT AND USE PERSONAL INFORMATION

We collect and process information in several areas to promote the welfare of our students, help every student fulfil their potential and manage our schools effectively. We use personal data:

- To safeguard and promote the welfare of our students
- To support our students’ learning and help every student fulfil her potential
- To support students with Special Educational Needs or Disability (SEND)
- To manage our schools effectively
- To understand our customer base and to develop and grow our business
- For the employment and management of our staff
- To communicate with our network of alumnae
- To generate philanthropic income

Parents provide information about themselves and students when completing LPSM’s parent contract on entry to our schools, as well as related documents such as registration and health record forms. Personal information is also collected directly from students and parents by direct means such as meetings, discussions, schoolwork and in general correspondence.

Whilst we collect most of our personal information from students and parents directly, in some cases personal data may be supplied to us by third parties, for example another school, a local authority, or other professionals.

DATA PROTECTION OFFICER

Our Data Protection Officer is **Fiona McAllister**. You can contact her by email: f.mcallister@londonparkschools.com or via our postal address. In the case of the latter, please mark the envelope ‘Data Protection Officer’.

SAFEGUARDING AND PROMOTING THE WELFARE OF OUR STUDENTS

The safety and welfare of our students will always be our overriding concern. We record and monitor information on student attendance and absence and may record and process information about our students' personal and social development to provide them with appropriate pastoral care".

We may share information in accordance with legal requirements and Government guidance, with third parties such as regulators, local authority children's services, the courts or the police.

If a student leaves our school to attend another school, we may share information with that new school for safeguarding or welfare reasons in accordance with the statutory guidance "Keeping Children Safe in Education".

Assessing and monitoring academic potential and progress

We record and process information that monitors and assesses student academic progress. We may share this information with authorised third parties, such as the Centre for Evaluation and Learning at Durham University to access services that support the improvement of educational outcomes.

These include:

- Baseline assessments that support educational tracking – giving measures of an individual's potential and progress through school.
 - Diagnostic assessments that help inform teachers where interventions may be helpful to improve pupil outcomes.
 - Attitudinal questionnaires that help to give a deeper understanding of the learning environment as seen by children and young people.
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We may share information with the Department for Education where there is a statutory basis for doing so.

Supporting children with Special Educational Needs or Disability (SEND)

A student may have special educational needs if they have a learning difficulty or disability which calls for special educational provision to be made for them.

We may record and share information with relevant professionals or agencies in order to assess whether a child has special educational needs, and to identify any provision that should be made available to support her learning.

Managing our schools effectively

While we collect most of our personal data from students and parents or guardians directly, in some cases personal data may be supplied to us by third parties as an important element of

ensuring we can offer the very best education possible (for example another school, a local authority, or other professionals).

We use the personal information we collect to support the day-to-day management of our schools; this includes keeping class registers, organising and monitoring student activities, providing education services and providing information technology services.

We may share personal information between parents, students and others where this is necessary and there is a legitimate interest in doing so (see below in “Our legal basis for processing personal information”)

STUDENT APPLICATIONS

An application for a place at LPS may be made on behalf of a prospective student, ordinarily by a person with parental responsibility. We ask applicants to provide personal information about themselves and the child they are applying for. This includes name, date of birth, contact details, address, and current or previous schools. We ask for this information so that we can process and assess the application against our admissions criteria. These admissions criteria may vary depending on where a student is applying from and further information on this can be found on in the Admissions policies on our website.

We also ask for information on nationality, ethnicity, languages spoken and any individual needs a student might have to ensure we make effective provision for them, and to provide statistical information. Because we are UKVI licence holder, we are required to prove that all students have a right to study in the UK and so upon registration we ask for a copy of the applicant’s passport.

When we offer a place at one of our schools and this is accepted, we will ask for further information, including details of medical history and dietary needs. This is so that we can provide appropriate health care to our student. We may share this information with authorised third parties if we believe this is necessary and, in a child’s, best interest, for example in the event of a medical emergency.

We will also request a copy of the student’s birth certificate and photo ID for each parent or persons with parental authority who are responsible for signing the contract as these form part of our safeguarding procedures.

FINANCIAL INFORMATION

We will ask for and hold the details of those who will pay any fees due, and their bank account details. We may hold information about bankruptcy petitions and statutory demands.

PHOTOGRAPHS

We will take photographs of students to identify them in our school records. We may also take photographs or record video during lessons, presentations or school trips where this supports delivery of our school curriculum.

Where we wish to take photographs of students and use these in school publications, for example a school magazine, prospectus or on the school's social media we will only do this if we have a separate consent. Depending on the nature of the consent we are asking for, and the age and understanding of the student, we may ask for our students for their consent, or a parent, or both.

CCTV

We may use CCTV for safety and security reasons. CCTV is not used in private areas such as changing rooms or toilets and is not retained for longer than we consider necessary to fulfil this purpose.

FOR THE EMPLOYMENT AND MANAGEMENT OF OUR STAFF

Contractual responsibilities

We record and process staff personal information to fulfil our contract of employment with our staff and to monitor our employment policies. This information includes (but is not limited to) their name, address, date of birth, next of kin and emergency contact details, applications for employment, academic qualifications, registrations with professional bodies, ethnicity, salary information, bank account and pension details, relevant medical history and any individual needs including those relating to disability.

Statutory responsibilities

We collect, record and process some personal information to comply with our statutory responsibilities. This includes (but is not limited to) information relating to tax, National Insurance, statutory sick pay, statutory maternity and paternity pay, family leave, entitlement to work in the UK, proof of identity, Disclosure and Barring Service checks and criminal convictions.

Management responsibilities

We record information that enables us to support the personal development of our staff and to assess their performance. This includes personal development appraisals, performance monitoring, capability, grievance and disciplinary matters, absence and sickness monitoring.

Collection of data

Some data is collected directly from prospective or newly appointed staff. Other personal data is collected from third parties, such as references from former employers, medical information, or identity checks via an external identity checking service.

Diversity Information

We invite our staff to provide information about their ethnicity, Nationality, country of origin, disability and religion to allow us to build a picture of and respond to the diversity of our workforce. Providing this information is voluntary and staff are free to answer, 'prefer not to say'. We do not share this personal information with any third parties.

COMMUNICATING WITH OUR NETWORK OF ALUMNI

All LPS graduates automatically become members of our alumni network and are invited to join our online community to receive regular email updates on the latest alumni news and events.

Our alumni are also invited to participate in networking groups, or to share their knowledge and experience within our schools for the benefit of current students and other alumni.

GENERATING PHILANTHROPIC INCOME

You can find out about how you can support the LPS and the Dukes Foundation fundraising programmes [here](#)

With your permission, we will use information you have provided to contact you on behalf of LPS and its schools to update you with news and events and how you can support the exceptional education we provide.

As a fundraising organisation, we undertake in-house research to identify potential donors and will use the information you have provided along with other public sources of information to get a better understanding of who you are, so that our communications can be best tailored to you, as well as your likely interests and concerns. In addition, this allows us to target our resources as effectively as possible, which our alumnae and stakeholders tell us is important for them.

We may also carry out wealth screening to fast track the research using trusted third-party partners to gather further information about you. Such information is compiled using publicly available data sources (such as Companies House, the Electoral Register, company websites, 'rich lists', social networks [such as LinkedIn], political and property registers and news archives) or information that you have already provided us.

As we continue our fundraising programmes, we are committed to keeping your records as accurate and up to date as possible and we may engage a third party to carry out data

cleansing, but only on terms that prevent them from using the information we provide for any other purpose.

To understand our customer base and to develop and grow our business

We may use personal information to build up a picture of our customer base and to advertise our schools to potential new audiences, either through ourselves or external service providers. This may involve sharing your personal information with third party providers for analysis and matching it against data they already hold to determine your preferences, interests and characteristics. This can then allow us to promote the activities of LPS customers with similar preferences, interests or characteristics.

UNDERTAKING DUE DILIGENCE

We may use third party service providers to help us adhere to anti-money laundering regulations and other laws, such as those defined by the Charity Commission regarding charitable donations. This may involve the use of services which help us identify risk before entering a contract for education, prevent the likelihood of accepting proceeds of crime and avoid reputational risk. For example, personal data may be checked against global sanctions lists as well as regulatory enforcement, law enforcement lists and other public sources of available information.

OUR LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION

We process personal information where one of the following applies:

Legitimate interests

This means that the processing is necessary for legitimate interests pursued by LPS, unless this would override your fundamental rights, considering your reasonable expectations. We rely on legitimate interests for many of the ways in which we process personal information, including providing educational services to our students and managing our schools effectively.

Necessary for a contract

We may need to process personal information to perform our obligations under contract, or to gather information prior to entering a contract. For example, we need your name and contact details so that we can update you on a student's progress, so that we can contact you if there is a concern, or so that we can process information about school fees. We also process the personal information of our staff as part of our contract of employment with them.

Legal obligation

We are under a duty to comply with several legal obligations, and we will process personal information in connection with these. Legal obligations can relate to safeguarding, health and

safety and statistical returns to the Government. Where necessary we may share personal information with other service providers, such as insurers and professional advisers.

Vital interests

We may process personal information if we believe this is necessary to protect an individual's vital interests. This might include sharing allergy information with third party caterers, or other health information with medical professionals providing treatment.

Consent

Where none of these conditions apply and we still wish to process your personal information we will ask for your consent. Depending on the nature of the consent we are asking for, and the age and understanding of the student, we may ask for our students for their consent, or a parent, or both.

If we ask for consent, we will be clear about what we are asking to do with your personal information. Where we are relying on consent to process personal information you may withdraw your consent at any time. Please note that we may need to continue to process personal information under one of the other grounds set out above.

OUR LEGAL BASIS FOR PROCESSING SPECIAL CATEGORIES OF PERSONAL DATA

Data protection legislation also refers to "special categories of personal data" which is more sensitive personal information needing a higher level of protection. This includes data revealing racial or ethnic origin, trade union membership, and the processing of biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation. We take extra care when processing this type of information and will only process this type of information when one of the following applies:

ETHNICITY DATA OF STUDENTS

We may collect information on the ethnicity of students as we are under a statutory obligation to complete an annual school census and return to the Secretary of State for Education.

TRADE UNION MEMBERSHIP

Trade union representatives are entitled to reasonable paid time off to receive training and undertake certain trade union duties and activities (for example, as health and safety or union learning representatives). We record the names of our trade union reps so that we know who they are and ensure that we comply with employment law.

BIOMETRIC DATA

We may use fingerprint recognition systems to support cashless catering in canteens, or for door entry access. Where we do this, we will obtain clear consent, and we will provide an equal alternative option if a student or member of staff doesn't wish to use a fingerprint recognition system.

DATA CONCERNING HEALTH

We record information on the health of our staff where this is necessary to fulfil our obligations under employment law, make adjustment to support them, calculate their entitlement to sick pay or to ensure the safety of students in their care.

We may record and process information on the health of our students in the following areas:

Safeguarding – it may be necessary for us to record information on the physical or mental health of our students and share this with health or social care professionals to ensure our students receive appropriate health or social care treatment.

Pastoral care – we may record information concerning the social, psychological or physical development of our students and this may include information concerning their health, to make provision for appropriate health or social care treatment.

Special Educational Needs and Disability (SEND) – when we record information on a student's individual needs this may include information concerning their health. Where we do this, it is to make provision for appropriate health or social care treatment.

Medical care – we record information on any pre-existing medical issues of our students and any medical episodes they experience at school. This is to make provision for appropriate health treatment. In a medical emergency we may share information with other parties, such as ambulance staff or a hospital if we believe it is in an individual's best interests, and they are unable to provide this themselves.

DATA CONCERNING A PERSON'S SEX LIFE OR SEXUAL ORIENTATION

We may record information on a student's sex life or sexual orientation where this is necessary to provide appropriate safeguarding or pastoral care. We will do this where we believe it is necessary to make provision for appropriate health or social care treatment, protect a student from physical, mental or emotional harm, or protect their physical, mental or emotional wellbeing.

CONSENT

Where none of the above conditions apply and we still wish to process special categories of personal data we will ask for consent. If we ask for consent, we will be clear about what we are asking to do with any sensitive personal information, and the person providing consent may withdraw this at any time. Depending on the nature of the consent we are seeking, and the age and understanding of the child, we may ask our students for their consent, or a parent, or both.

How long do we keep personal information?

In line with the law, we keep information for as long as is necessary to carry out the services and activities listed above. Further Information on our retention schedule may be found [here](#)

We retain some information after our students have left our schools, for example, student roll, public exam results, and safeguarding information. We may keep some limited information for a longer time if we believe this is appropriate for historical, research or statistical purposes.

YOUR LEGAL RIGHTS

Your right of access

You have the right to ask us for copies of your personal information. There are some exemptions, which means you may not always receive all the information we process. You can read more about this [here](#).

Your right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure

You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing

You have the right to object to the processing (use) of your personal data in some circumstances.

Your right to data portability

This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. The right only applies if we are processing information based on your consent or under, or in talks about entering a contract and the processing is automated.

Please write to us at **LPS Mayfair**: 106 Piccadilly, W1J 7NL, if you wish to exercise this right.

You can find further information about your rights [here](#).

If we need more information to help find your data or identify you, we may ask you for more information. In these circumstances we will wait until we have all the necessary information before dealing with your request. Where a request is made on behalf of a third party, we may seek evidence of authority to act of their behalf, however it is the third party's responsibility to provide satisfactory evidence of this entitlement.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights), however, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

You have the right to make a complaint to the Information Commissioners Office which is the regulatory body responsible set up to uphold information rights in the public interest. You can read more about this, including how to make a complaint [here](#).