

Privacy and Data Protection Policy

LPS Mayfair

Name	Privacy and Data Protection Policy
Site	LPS Mayfair, 106 Piccadilly, London W1J 7NL
Regulatory framework	UK General Data Protection Regulation (UK GDPR); Data Protection Act 2018; Keeping Children Safe in Education; Protection of Freedoms Act 2012 (biometric data).
Legal entity	LPS Mayfair
Approved by	Heidi Armstrong (Head)
Policy owned by	Fiona McAllister (Data Protection Officer)
Date effective from	September 2026
Date of next review	September 2027 (annual, or sooner following legislative or regulatory change)
Published on website	Yes

This policy will be reviewed and updated annually or more frequently where there are changes in legislation or government guidance.

1. Introduction

This notice explains how and why London Park Schools (LPS) collects personal information about students and other individuals, and what we do with it. We process personal information in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, which together set out your rights in respect of your personal information.

Personal information means any information relating to you, or information that when combined with other information identifies you. This includes your name, address, email address, CCTV images and photographs, and online identifiers such as IP addresses or cookie identifiers.

Our Data Protection Officer is Fiona McAllister. She can be contacted by email at f.mcallister@londonparkschools.com, or by post marked 'Data Protection Officer' to our registered address.

2. How and why we collect and use personal information

We collect and process personal information to promote the welfare of our students, help every student fulfil their potential, and manage the school effectively. Parents provide information when completing our parent contract and related documents such as registration and health record forms; information is also collected directly from students and parents through meetings, discussions, schoolwork and correspondence. In some cases information is supplied by third parties, such as another school, a local authority, or other professionals.

LONDON PARK SCHOOLS

● CLAPHAM ● MAYFAIR ● SIXTH ● HYBRID

Safeguarding and welfare

The safety and welfare of our students is our overriding concern. We record and monitor attendance and absence and may record information about students' personal and social development to provide appropriate pastoral care. We may share information with third parties such as regulators, local authority children's services, the courts or the police, in accordance with legal requirements and Government guidance, including Keeping Children Safe in Education, for example where a student moves to another school.

Academic monitoring and SEND

We record and process information that monitors and assesses academic progress, and may share this with authorised third parties, such as the Centre for Evaluation and Learning at Durham University, to support the improvement of educational outcomes through baseline and diagnostic assessments and attitudinal questionnaires. We may share information with the Department for Education where there is a statutory basis for doing so.

Where a student has a learning difficulty or disability calling for special educational provision, we may record and share information with relevant professionals or agencies to assess this and identify appropriate support.

Managing the school

We use personal information for day-to-day management, including class registers, student activities, education services and IT services, and may share information between parents, students and others where necessary and there is a legitimate interest in doing so (see Section 4).

For admissions, we ask applicants for name, date of birth, contact details, address, and current or previous schools, to assess applications against our admissions criteria, along with nationality, ethnicity, languages spoken and any individual needs. As a UKVI licence holder we require a copy of the applicant's passport at registration. Where a place is accepted we also ask for medical history, dietary needs, a birth certificate and photo ID for each parent or person with parental responsibility, as part of our safeguarding procedures.

We hold the details of those who pay fees, including bank account details, and may hold information about bankruptcy petitions and statutory demands.

We take photographs of students for school records, and may photograph or record video during lessons, presentations or trips to support the curriculum. Photographs used in publications or on social media require separate consent, sought from the student, a parent, or both depending on the nature of the consent and the student's age and understanding.

We use CCTV for safety and security. It is not used in private areas such as changing rooms or toilets, and is not retained longer than necessary.

3. Employment and management of our staff

We record and process staff personal information to fulfil our contract of employment and monitor our employment policies, including contact and next of kin details, applications, qualifications, professional registrations, ethnicity, salary, bank and pension details, and relevant medical history or individual needs.

LONDON PARK SCHOOLS

● CLAPHAM ● MAYFAIR ● SIXTH ● HYBRID

We also process information to comply with statutory responsibilities, including tax, National Insurance, statutory pay, family leave, right to work, proof of identity, DBS checks and criminal convictions, and to support performance and development, including appraisals, capability, grievance and disciplinary matters, and absence monitoring.

Some data is collected directly from staff, and some from third parties such as references or identity checking services. We invite staff to voluntarily provide diversity information, including ethnicity, nationality, disability and religion, to understand our workforce; staff may decline to answer, and this information is not shared with third parties.

4. Alumni, fundraising and business development

LPS graduates automatically become members of our alumni network, with regular updates on news and events and opportunities to take part in networking or share knowledge with current students.

With your permission we use information you provide to contact you about supporting LPS and the Dukes Foundation. As a fundraising organisation we carry out research to identify potential donors and, where relevant, wealth screening using trusted third parties and publicly available sources such as Companies House, the Electoral Register, social networks and news archives, so our communications are well targeted. We may engage a third party for data cleansing, on terms that prevent them using the information for any other purpose.

We may also use personal information to understand our customer base and advertise to new audiences, including sharing information with third-party providers for analysis, and to undertake due diligence for anti-money laundering and Charity Commission purposes, such as checking data against sanctions and law enforcement lists.

5. Our legal basis for processing personal information

- **Legitimate interests:** necessary for legitimate interests pursued by LPS, unless outweighed by your fundamental rights. This covers most educational and school management activity.
- **Necessary for a contract:** for example processing your contact details to update you on a student's progress, or as part of our contract of employment with staff.
- **Legal obligation:** for example safeguarding, health and safety, and statistical returns to Government.
- **Vital interests:** for example sharing allergy information with caterers, or health information with medical professionals.
- **Consent:** where none of the above applies, we will ask for clear consent, which can be withdrawn at any time, sought from the student, a parent, or both depending on their age and understanding.

6. Special categories of personal data

Some personal data is more sensitive and needs extra protection: race or ethnic origin, trade union membership, biometric data, health data, and data concerning sex life or sexual orientation. We only process this where one of the following applies.

LONDON PARK SCHOOLS

● CLAPHAM ● MAYFAIR ● SIXTH ● HYBRID

- **Ethnicity:** collected on students under our statutory obligation to complete the annual school census.
- **Trade union membership:** we record the names of trade union representatives to comply with employment law.
- **Health data:** recorded for staff to meet employment law obligations and for students for safeguarding, pastoral care, SEND provision and medical care, including sharing with emergency services where necessary and in the individual's best interests.
- **Sex life or sexual orientation:** recorded only where necessary for safeguarding, pastoral care, or to protect a student's wellbeing.
- **Consent:** where none of the above applies, we will ask for clear consent, which can be withdrawn at any time, sought from the student, a parent, or both depending on their age and understanding.

7. How long we keep personal information

We keep information for as long as necessary to carry out the activities described in this policy; further detail is in our retention schedule. We retain some information after a student leaves, such as the school roll, exam results and safeguarding information, and may keep limited information longer for historical, research or statistical purposes.

8. Your legal rights

- **Access:** ask us for copies of your personal information, subject to some exemptions.
- **Rectification:** ask us to correct inaccurate information or complete incomplete information.
- **Erasure:** ask us to erase your personal information in certain circumstances.
- **Restriction:** ask us to restrict processing of your information in certain circumstances.
- **Object to processing:** object to processing in some circumstances, for example where we rely on legitimate interests.
- **Object to direct marketing:** an absolute right, with no conditions attached tell us at any time and we will stop using your information for marketing.
- **Data portability:** ask us to transfer information you have given us to another organisation, or to you, where processing is based on consent or contract and is automated.

You will not usually have to pay a fee to exercise these rights, though we may charge a reasonable fee, or decline, if a request is clearly unfounded, repetitive or excessive. We aim to respond within one month and will keep you updated if a request is complex or takes longer.

9. Making a request or a complaint

Please email f.mcallister@londonparkschools.com or write to us at DPO - London Park Schools, 106 Piccadilly, London W1J 7NL, to exercise any of the rights above. If we need more information to locate your data or verify your identity, we will ask before proceeding; where a request is made on someone else's behalf, we may ask for evidence of authority to act for them.

You have the right to complain to the Information Commissioner's Office, the regulator responsible for upholding information rights in the public interest.

10. Data breaches and online safety

The School takes all reasonable steps to protect personal data and maintain appropriate standards of information security. All staff must report actual, suspected, or potential personal data breaches immediately to the Data Protection Officer (DPO).

Upon becoming aware of a potential breach, the DPO will:

- Take immediate steps to contain and mitigate the impact of the breach.
- Assess the nature and scope of the incident, including the personal data involved, the number of individuals affected, and the potential consequences.
- Investigate the cause of the breach and identify any remedial action required.
- Record all personal data breaches, including those that do not require notification to the Information Commissioner's Office (ICO).

The DPO is responsible for carrying out a risk assessment to determine whether a breach is likely to result in a risk to the rights and freedoms of individuals. Where the reporting threshold is met, the School will notify the ICO without undue delay and, where feasible, within 72 hours of becoming aware of the breach.

Where a breach is likely to result in a high risk to the rights and freedoms of affected individuals, the School will notify those individuals without undue delay, providing details of the breach, the likely consequences, and any steps that should be taken to protect themselves.

Following any breach, the DPO will review the incident, identify any lessons learned, and ensure that appropriate improvements are made to policies, procedures, training, systems, or security measures to reduce the likelihood of recurrence.

Online safety incidents involving personal data will be managed in accordance with this procedure, alongside the school's safeguarding, IT acceptable use, and information security arrangements.

For the avoidance of doubt, the Head of Operations acts as the School's Data Protection Officer (DPO) and is responsible for assessing and managing personal data breaches and determining whether notification to the ICO or affected individuals is required.

11. Monitoring and review

This policy will be reviewed annually and updated in line with legislative or regulatory changes.