



# HEATH HOUSE PREPARATORY SCHOOL

## Privacy Policy

Heath House Preparatory School is committed to protecting the privacy and security of your personal information.

This privacy policy describes how we collect and use personal information about you and your child before, during and after their schooling with us, in accordance with the General Data Protection Regulation (GDPR). This policy also outlines what rights individuals have over data held by us and sets out how we comply with GDPR.

It applies to all prospective, current and former pupils and their families. It must also be complied with by the proprietors, all staff and visitors and others with access to your personal information whilst at Heath House.

### Who we are

We are Heath House Preparatory School located at 37 Wemyss Road, Blackheath, London SE3 0TG. In this policy Heath House Preparatory School is also referred to as "we", "us" or "Heath House".

### Our Contact Details

To discuss this policy or any matters relating to the data we hold and how we use it please contact Mrs Elena Laslett-Shaw the School Manager and Bursar. She can be contacted on 020 8297 1900 or at 37 Wemyss Road, Blackheath, London SE3 0TG or at [info@heathhouseprepschool.com](mailto:info@heathhouseprepschool.com).

### What is the Purpose of this Document?

Heath House is a "data controller". This means that we are responsible for deciding how we hold and use the personal information about you and your child that we collect. We are required under data protection legislation to notify you of the information contained in this privacy notice. Those acting on the 'data controllers' behalf are the proprietors of Heath House and the staff employed by Heath House.

We may update this notice at any time but if we do so, we will provide you with an updated copy of this policy as soon as reasonably practical.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you and/or your child, so that you are aware of how and why we are using such information and what your rights are under the data protection legislation.

### Data protection principles

We will comply with data protection law. This says that the personal information we hold must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.

4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

## Personal Information

Personal data, or personal information, means any information about an individual from which that person can be identified. This includes an individual's name, contact details, photographs and financial information. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection, such as information about a person's religion, ethnic group or health and medical information.

## What Personal Information Does Heath House Collect and Process

Set out below are examples of the personal information we collect and where we collect it from:

- We obtain core data relating to parents and their child from admissions forms. Where appropriate we may also obtain supplementary information from the child's previous school or nursery as well as professionals such as doctors. This core data will include names, addresses, telephone numbers, e-mail addresses and other contact details.
- Where relevant pupils academic, disciplinary, admissions and attendance records from previous care and educational suppliers.
- Parents' employment information from admissions forms.
- Information about individual's health and their next of kin from admission forms.
- Information relating to the child's family circumstances which will have an impact on their welfare. Heath House will also, where necessary, obtain information relating to court orders or criminal petitions to safeguard all children and staff at Heath House.
- Heath House operates CCTV outside of all 3 buildings.
- During off site educational visits, photographs will be taken of children on school cameras.
- Heath House will regularly send parents information via ParentMail. Parents are asked to fill in a registration form expressing their consent for their details to be shared with ParentMail. ParentMail are GDPR compliant and have their own set of privacy policies relating to individuals data. Information is also shared in the form of the termly school newsletter which is issued in both paper format and via ParentMail.
- SEN and Behavioural information.
- Heath House may, when conversing with a parent or a member of Heath House staff, use or discuss data relating to an individual via email. For example, notifying the Heath House office that a child is absent via email which may then be forwarded to the individual's class teacher.
- Clubs lists, school lists, timetables and house lists are displayed in each of the three school buildings. These show individual children's names and their year group.
- Parents' names and addresses will be used for the purpose of invoicing. Necessary information will also be shared with the school's accountants.
- In connection with your browsing of our website we may collect, store and use the following categories of personal information about you:
  - Technical Data including your internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions,

operating system and platform and other technology on the devices you use to access our website

- Usage data including how you use our website.

Please note, Heath House is compliant with the PECR or Privacy and Electronic Communications Regulation.

### **How Heath House Collects Data**

Generally, we receive personal data from an individual directly (including in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction and communication such as email or written assessments. However, in some cases personal data may be supplied by third parties (for example another school or other professionals or bodies working with that individual) or collected from publically available resources.

### **Why we use Personal Data**

The primary purpose for which we use personal information is to provide educational services to your child. We have set out below different examples of the ways in which we use personal information. These examples are not exhaustive.

- To support and monitor pupils as well as to report on their progress.
- To provide appropriate pastoral care to children and to safeguard them.
- To safeguard the welfare and wellbeing of your child and other pupils at the school.
- CCTV is used to make sure the school site is safe. It is not used inside of the school buildings (aside from covering the door area at the Old Library) and does not cover private areas such as toilets.
- To assess the quality of the education that we provide.
- To send you information to keep you up to date with what is happening at the school. For example, by sending you information about events and activities taking place and the termly newsletter.
- Photographs may be uploaded to the parent gallery area of the Heath House Prep School website or used in the school termly newsletters and displays. The photos will not be shared in any other way unless prior consent is given from the child's parents.
- The attendance register may be used for the purpose of contacting past pupils to invite them to alumni events.
- We process financial information about you in relation to the payment of fees.

### **Who Has Access to Personal Data and Who We Share Personal Data With**

- Essential personal information is confidentially shared with the ISI, ISC, ISA, Lewisham Council and the Department for Education for official purposes for example census information.
- Personal data will also be shared with the schools accountant or debt collection agencies for the purposes of collecting fees.
- Children's exam results will be kept on their file in line with the schools retention period and may be shared with other outside agencies such as the ISI.
- Information will be shared, on the proviso that consent is received, to the following outside agencies who have all provided evidence of their GDPR compliance:
  - The NHS
  - Trinity College London (for musical theatre and performing arts examinations)
  - ACE for performing arts lessons.

- Where appropriate, extra-curricular teachers and club teachers including Miss Zheng and Mr Mulvey. (in most cases this will be the child's name only)
- The Woolwich Waterfront Centre, for the purposes of swimming and gym lessons.
- The Reach Climbing Wall Charlton, for the purposes of climbing lessons.
- The Herne Hill Velodrome, for the purposes of cycling lessons.
- Childs new school in the capacity of a reference.
- In some cases, Heath House does not need to seek permission to share an individual's data for example, reporting concerns to child services, the police, the school's insurers or the school's legal advisors.
- Heath House uses the Data Storage System 'Synology' to store all documents which are produced, Synology is a cloud based system which is fully GDPR Compliant.
- Occasionally we might need to use consultants, experts and other advisers to assist us in fulfilling our obligations and to run the school properly. We might need to share personal information with them if this is relevant to their work.
- Heath House outsources its accountancy to Cunningham Hill Associates Ltd and the accountants act as Data Processors for the school.
- We may share information about you with others in your family, such as another parent or step-parent, for example where this is part of our obligation to take care of your child, as part of our wider legal and regulatory obligations or in connection with school fees.
- We will share your details with other parents in your child's class by way of distributing a class contact list where you have consented to us doing so. Once you have given your consent and these details have been shared with other parents it is then for the parents to determine between themselves how and when they will use contact details to contact other parents and by consenting to Heath House sharing your data in this way, you agree that after it is passed to other parents we are not responsible for how this data is used.
- We may need to share information if there is an emergency, for example, if you are hurt while on our premises.
- We will share a limited amount of data (usually just an individual's name and their class) with Microsoft Teams in order to create a login for each pupil to use in times of remote learning.

### **Legal grounds for Heath House using an Individual's Data**

This section contains information regarding the legal basis that Heath House relies upon when handling individual's personal data.

#### Legitimate Interest

A legitimate interest means that it is necessary for Heath House to process an individual's data. We rely on legitimate interests for most of the ways in which we collect, use, store and handle personal data. Specifically, Heath House has a legitimate interest in:

- Providing educational services to children
- Safeguarding and promoting the welfare of all staff and children
- Promoting the ethos and interests of Heath House, this also includes ensuring the school's rights can be enforced for example being able to contact parents if fees are not paid
- Facilitating the effective operation of the school
- Ensuring that all relevant legal obligations of the school are complied with.

If an individual wishes to object to Heath House using their information where legitimate interest has been relied upon, they should contact the School Manager and Bursar, Mrs Elena Laslett-Shaw immediately.

### Necessary for a Contract

In certain situations, Heath House will need to use an individual's data in order to perform contractual obligations with parents or where appropriate, contractual obligations with staff. For example, Heath House must have a parent's name and contact details to ensure parents can be notified of a child's progress or so that the school is able to make contact should a concern or issue arise.

### Legal Obligation

Heath House may need to use an individual's personal data in order to comply with a legal obligation such as to report a concern to Children's Services. It is also necessary for Heath House to have data to comply with the Education Regulation (2013) and the Education Act (1996). As a school, we may also be asked to provide data to the courts, the local authority or the police where the law dictates.

### Vital Interest

This basis is relied upon to ensure the prevention of harm coming to an individual by way of collecting data such as allergy information or information on any other condition or illness.

### Public Interest

Heath House Preparatory School considers that it is acting in the public interest by providing education to children.

## **Special Category Data**

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data. The special categories are: Personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information and information about sexual orientation. Heath House **does not** hold data on individuals which falls into each category but has a duty to inform individuals the categories which are classified as 'special'. We may process special categories of personal information in the following circumstances under the following legal basis:

### Substantial Public Interest

The processing of special category data is necessary for reasons of substantial public interest. For example, to not have such data that could endanger an individual or a group of individuals.

### Vital Interest

To protect the vital interest of the individual where that individual is not able to give their consent, for example if they are seriously hurt.

### Legal Claims

This allows the school to share personal data with legal advisors and insurers should there be a need to establish or defend a legal claim.

### Medical Purposes

This includes emergency medical treatment or first aid should the need arise.

## **Data Retention**

- Core Data, in the form of the pupil's record, will be kept for the period which we are mandatorily required to keep it which is a period of 25 years from child's date of birth. This is kept in the form of physical records and will also be kept on the schools admissions register. This retention period is in line with the Independent Schools Association guidance.

- The admissions register will be kept indefinitely to comply with regulation.
- Supplementary information will be kept for 6 years after the child leaves Heath House at which point the data will be securely disposed of. This is information such as attendance records.

Detailed information on all retention periods is available on request, free of charge, from the School Office. Please contact the School Manager and Bursar, Mrs Elena Laslett- Shaw to obtain a copy.

No personal data is retained indefinitely with the exception of the admissions register which is required to be must be kept to comply with regulation.

### **Data Storage**

The physical data which Heath House has is stored in secure filing cabinets which are locked, in a locked office to ensure their security when not in use. During working hours, the office is not left unattended. If a situation arises where no appropriate staff member is available to be in the office, the cabinets are locked and so is the office until their return.

Heath House uses SIMS, a School Information Management Software to store data in addition to the physical data that is held in paper form. The data held on SIMS is a replica of the personal data held in physical copy and is designed to be a secure way for staff to access information such as names and dates of birth, to take daily registers, access allergy information and other data that relates to the teaching and care of children in attendance at Heath House. SIMS is a GDPR compliant company.

Some data is stored electronically on laptops and computers owned by Heath House as well as on the cloud storage system 'Synology'. All laptops and computers are password protected and the passwords are not generic and changed regularly. The Synology cloud storage system is GDPR compliant.

All teachers back up all documents saved on their laptops or computers to the Synology and the main computer in the school office is backed up to both the Synology and an external hard drive regularly.

In the event of exceptional circumstances leading to a school wide closure, teachers may need to work from home and will use Microsoft Teams to teach remotely. Each child will be issued with a username and password to access Microsoft Teams. The only information that is required to create the Office user account is the child's name. Following this, each child is assigned to a year group Team. No other data will be shared with Microsoft Office. The school will never share any data beyond the child's name and year group.

### **Individual Rights**

In line with the General Data Protection Regulation (or GDPR), individuals have the following rights, some rights are new and some rights have been enhanced from the previous Data Protection Act (1998). The rights an individual has are as follows:

- If any information relating to an individual is incorrect, that individual has the right to ask Heath House to correct the data.
- In some cases, Heath House may have restricted use of an individual's data, for example if checks are being made to ensure the data accuracy.
- Individuals have the right to ask what information the school holds about them and may ask for a copy of it. The school is also able to inform individuals on things such as why the school has the data, where it has come from and what the data is used for.
- Individuals can request for data to be erased in certain circumstances, for example where we no longer need the information. It should be noted that in line with the retention periods Heath House has, no data is kept for longer than is necessary.

- Individuals can request the transfer of their personal information to another party.
- Individuals have the right to be informed on what data Heath House holds about them.
- Individuals now have enhanced rights in relation to automated decision making and profiling. Whilst automated decision making and profiling are not in use at Heath House, it is our duty to inform you of your rights.
- Individuals can object to processing of their personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

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

### **Withdrawing Consent or Requesting Erasure**

If an individual wishes to withdraw their consent for the recording, processing and managing of the data that they have provided Heath House, they must do so in writing to the Data Controller or those acting on its behalf. Individuals may request data to be erased in some circumstances however due to the schools legal obligation, erasure requests may be refused in order for Heath House to remain compliant with UK Law. Requesting erasure of an individual's data should be carried out in writing to the Data Controller or those acting on its behalf. The correspondence, once received, will be acted upon in a timely manner (and within one month to remain GDPR compliant) and a reply will be sent to the individual confirming the date that the erasable data will be deleted.

Further information regarding data protection rights can be obtained from the School Manager and Bursar, Mrs Elena Laslett-Shaw, or from the Information Commissioners Office whose contact details can be found at the end of this policy.

### **Cookies**

Where you are accessing our website you can disable or refuse cookies, but please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookies policy which can be found on our website.

### **Data Breaches**

If a data breach were to happen the Data Controller will report this, where required to do so, to the Information Commissioners office within 72 hours. Contact would be made via the following means:

Phone: 0303 123 1113

Website: <https://ico.org.uk/concerns/>

The data which is stored electronically at Heath House is protected by various firewalls, anti-virus software and is only accessible to the appropriate staff for example those acting on behalf of the data controller and the named data processors. All staff employed by Heath House and ancillary staff providing their services to us, are asked to sign a confidentiality agreement to ensure that any data they are permitted to access is done so in a secure and compliant manner. No access is permitted to unauthorised persons under any circumstance. Cyber-attacks are likely to cause minimal impact on the school due to the small amount of data that is held electronically; should the school change the way it stores its data, this policy will be updated accordingly.

Individuals are able to contact the Information Commissioners Office if they feel that Heath House Preparatory School is not treating their data appropriately. Their contact details are:

Phone: 0303 123 1113

Website: <https://ico.org.uk/concerns/>

Where possible, individuals should approach the school in the first instance to see if a solution can be found however individuals may always contact the Information Commissioners Office if they wish.

#### **Further information and Guidance on GDPR**

Mrs Elena Laslett-Shaw, the School Manager and Bursar should be contacted with any GDPR related questions. She is contactable on 020 8297 1900 or at 37 Wemyss Road, Blackheath, London, SE3 0TG or [info@heathhouseprepschool.com](mailto:info@heathhouseprepschool.com). Individuals may request a copy of this policy in hard copy along with any other policy or information document mentioned in this policy from the School Manager and Bursar.

Internal use only

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