

PARENT AND PUPIL PRIVACY NOTICE

May 2020



INTRODUCTION

This notice is to help you understand how and why we collect personal data about you and what we do with that information. It also explains the decisions that you can make about your own information. This statement complies with the UK Data Protection Act 2018 and with the requirements of the European General Data Protection Regulation.

If you have any questions about this notice please contact the School's Privacy Officer at harrow@harrowschool.org.uk or on 020 8872 8000.

WHAT IS PERSONAL DATA?

Personal data is information that identifies you as an individual. This includes your contact details, next of kin and financial information. We may also hold information such as your religion or ethnic group. CCTV, photos and video recordings of you are also personal data.

HOW AND WHY DOES THE SCHOOL COLLECT PERSONAL DATA?

We obtain information about you from admissions forms and from your child's previous school. We may also get information from professionals such as doctors, local authorities, UK Visas and Immigration.

Information is also received by the School directly from you. For example you might email us with information about your marital status or provide us with documents such as court orders.

We collect this information to safeguard and promote the welfare of your child, promote the objects and interests of the School, facilitate the efficient operation of the School and ensure that all relevant legal obligations of the School are complied with.

For example:

- We may have information about any family circumstances that might affect your child's welfare or happiness.
- We ask if any of your child's immediate family members have special educational needs because in some cases these can be hereditary. The School can then use this information to assist your child.
- We may need information about any court orders or criminal petitions that relate to you.
- We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as toilets. Only the School's Security Department has access to all recorded footage. CCTV footage is normally stored for 30 days but might be retained for longer if necessary for legal and safeguarding purposes.
- We may take photographs or videos of you at School events.
- The school may share pupil images for marketing and to promote the school. Images will be anonymised unless consent has been requested to include names.
- Parents will be provided with a link and password to a pupil sports website where they will have access to information about sports fixtures. For safeguarding, parents are asked not to share access to this portal.
- Parents receive a copy of the bill book and are asked to keep this safe as it contains personal staff and pupil data.

- We may keep details of your address when your child leaves the School so we can send you our alumni magazines *Follow Up!* and a digital copy of the *Harrow Record* and find out how your child is progressing. We will also pass your details onto the alumni organisation, which is called the Harrow Association. Further information can be found at harrowschool.org.uk/Old-Harroviaans.
- Your details will be passed onto the HDT who may contact you whilst your son is at the school to inform you of upcoming events and fundraising projects. Further information can be found at harrowschool.org.uk/Old-Harroviaans at the support us page.
- Information may need to be shared between the HA and HDT in order for them to fulfill the above operations.
- To comply with our obligations under the Proceeds of Crime Act 2002, Terrorism Acts 2000-2006, and the Charity Commission's due diligence provisions, we collect and store parent information such as names and addresses, dates of birth, and copies of passport main pages.

We may send your information to, or store your information in other countries where:

- we store information on computer servers based overseas; or
- we communicate with you or your child when you are overseas (for example during the summer holidays if you live in a different country). The European Commission has produced a list of countries that have adequate data protection rules. The country we are sending your information to might not be on the list, which means that it might not have adequate rules.

FINANCIAL INFORMATION

- We will process financial information about you in relation to the payment of fees. In some cases, we get information about you from third parties such as credit reference agencies and solicitors or from your child's previous school(s).
- We may hold information about bankruptcy petitions and statutory demands.
- We may search the files of any licensed credit reference agency in order to verify your identity. This also allows us to assess your application for the award of a bursary or for credit in contemplation of an agreement for the deferment of fees. The credit reference agency will keep a record of that search and details about your application. This record will be seen by other organisations that make searches about you.
- Failure to supply information may result in a refusal of an award, credit or offer of place at the school.

SHARING PERSONAL DATA WITH THIRD PARTIES

In accordance with our legal obligations, we may share information with local authorities, the Independent Schools Inspectorate, Ofsted and the Department for Education, for example where we have any safeguarding concerns. We may also share information with the NHS including local GP surgeries and local hospitals, third party physiotherapy providers and child psychologists. We may seek separate consent where appropriate.

- On occasion, we may need to share information with the police or our legal advisers.
- If your child is not of British nationality we have to make sure that your child has the right to study in the UK. We might have to provide information about you to UK Visas and Immigration to comply with our duties as a Tier 4 sponsor.
- We may share some information with our insurance company, for example where there is a serious incident at the School.
- If you have unpaid fees while your child is at the School we may share information about this with other schools or educational establishments to which you intend to send your child.
- If your child leaves us to attend another school we may need to provide that school with information about you, for example details of family circumstances for safeguarding reasons.

- We also share personal data with the following: (Please note that these are examples to give you an impression of the types of organisations we share data with. Where appropriate we will provide further information prior to sharing.)
- Harrow Association and Harrow Development Trust. The Harrow Association and the Harrow Development Trust collect personal data from pupils and parents of the School. The Harrow Association does so in order to send alumni-related communications and information on work experience placements. The Harrow Development Trust does so to advance the opportunities and facilities provided for current boys. The Harrow Development Trust may also use the data for research in order to contact you with information on how you can support the School. You can find more information about both organisations and their activities on our website.
 - University of Durham Centre for Educational Management (CEM) for the purposes of academic baseline testing. Data collected includes name, date of birth, gender, previous school and baseline test results.
 - EVOLVE for the administration of school trips and excursions. Data includes parent names and email addresses, pupil name, pupil email, date of birth and gender.
 - SOCS (School Sports.com) for the administration of home and away sports fixtures and results. Data includes pupil names and team information.
 - Unifrog collects pupil data for university and careers guidance and to support further education and apprenticeship applications.
 - UCAS collects pupil data for university and careers guidance and to support further education and apprenticeship applications.
 - The exam boards including OCR, Edexcel, AQA, CIE and WJEC collect personal data from pupils sitting GCSE and A-level exams. Data includes pupil name, date of birth, candidate number and signature.
 - Steer for Affective Social Tracking. Testing takes place twice a year, collecting data for the purposes of monitoring pupils' mental wellbeing.
 - Pupil fee inclusive personal effects and personal accident insurance through Marsh Insurance. Marsh Insurance also offers pupils two opt-in services and AXA PPP Healthcare.
 - The Outfitters, Billings & Edmunds' and Shaws' will collect basic personal data in order to open and close pupil accounts.
 - The PhysioLink may request contact details from the school to procure payment following a pupil's treatment.
 - Online learning resources for educational purposes.
 - Boys may choose to share information via a School group on Strava which uses GPS tracking for registering sporting achievements and progress.
 - For our School management information databases, we hold maintenance and support contracts with the relevant providers. From time to time, we share data with our providers for the purposes of technical support and database testing. This data is encrypted in transit and at rest, and is anonymised where possible.
 - We may share personal data with third parties for the purposes of assessing bursary and scholarship applications or for money-laundering checks; including, Bursary Administration Limited (BAL), "Refinitiv", John Lyon's Charity and The Rank Foundation.
 - All boys in the Fifth Form partake in the My Future Choice's online psychometric testing. This tool focuses on a boy's individual interests and skills and will greatly assist our Careers Department in providing bespoke careers advice to every Fifth Form boy, and help him in choosing his A level subjects. Each boy will receive a report on his tests, which he will then discuss with Harrow's Careers Advisor, Michael Wright. The report and the notes from the follow-up interview will be sent to you well in advance of the Careers Convention in January, as well as the deadline for submitting your son's A level subject choices.

Where necessary, staff will complete a DPIA (Data Protection Impact Assessment) before entering into an agreement to share personal data.

All file transfers are secure and contractual terms with these companies include full data protection compliance.

WHAT DO WE DO WITH YOUR PERSONAL DATA?

Every member of staff who handles personal data is responsible for that information. The Privacy Officer and Senior Risk Owner (of that information) at our School oversee how we look after that personal data and decide how it is shared.

Like other organisations, we need to keep your information safe and up to date, only use it for what we said we would, destroy it when we no longer need it and, most importantly, treat the information we get fairly.

FOR HOW LONG DO WE KEEP YOUR INFORMATION?

We keep your information for as long as we need to in order to educate and look after your child. We will keep some information after your child has left the School, for example so that we can find out what happened if you make a complaint.

In exceptional circumstances, we may keep your information for a longer time than usual but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

We can keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes, for example if we consider the information might be useful if someone wanted to write a book about the School.

The School's Records Retention Schedule is available on request.

OUR LEGAL GROUNDS FOR USING YOUR INFORMATION

As a School we have to comply with various laws and this entitles us to use your information where necessary. For example, we have to make sure that we take care of your child.

- Unless this would be unfair to you, we have a legitimate interest in using your information to:
 - educate your child and others;
 - look after your child's welfare and the welfare of others; and
 - promote and develop the School so that it continues to be successful.
- We also use your information in order to provide education to your child, which is in the public interest.
- If something goes wrong we may need to use your information in connection with legal disputes.
- We have a contract with you to educate and look after your child. We are allowed to use information about you where this is necessary under that agreement.
- We may ask for your consent to use your information in certain ways. If we ask for your consent to use your personal information you can take back this consent at any time, in which case please speak to the Privacy Officer.
- We are allowed to use your information in an emergency, for example if your child requires urgent medical attention.
- We may use information about you if we need this for historical, research or statistical purposes.

WHAT DECISIONS CAN YOU MAKE ABOUT YOUR INFORMATION?

- Once a pupil is enrolled at the School, we will only share information about them with parents that have parental responsibility for that pupil, and not guardians or parents without parental responsibility. It is the responsibility of parents with parental responsibility to share information about

their child with their child's guardian and/or other parents without parental responsibility, and the guardian/parents without parental responsibility should seek that information directly from them.

- If information is incorrect you can ask us to correct it.
- If you would like us to change or update the information we hold about you please speak to the School's Pupil Database Manager, Mrs Manju Varsani, at pupildatabasemanager@harrowschool.org.uk.
- If you would prefer that certain information is kept confidential then please speak to your son's House Master.
- You can also ask what information we hold about you and be provided with a copy. We will also give you extra information such as why we use this information about you, where it came from and what types of people we have sent it to.

Since May 2018 you have been able to make even more decisions about your information, for example:

- if we ask for your consent to use your personal information you can take back this consent at any time. Please speak to the School's Privacy Officer;
- you can object to the use of your personal information by the School;
- you can ask us to delete or restrict the use of your information in certain circumstances; and
- you can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer.

You have the right to object to us using your information in the following circumstances:

- where we are relying on our legitimate interests to use your information as explained above under 'Our legal grounds for using your information'; or
- where we send you marketing information, for example about School events.

If you wish to exercise your right to object, please speak to the School's Privacy Officer. The Privacy Officer can give you more information about your data protection rights.

FURTHER INFORMATION AND GUIDANCE

This notice is to explain how we use your personal data. If you have any questions please contact the School's Privacy Officer at harrow@harrowschool.org.uk or on 020 8872 8000.

If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office at ico.org.uk.

**The Keepers and Governors of the Possessions Revenues and Goods
of the Free Grammar School of John Lyon
Incorporated by Royal Charter and under the Public Schools Act 1868 (as amended)
Registered Charity No: 310033**