



RHSEL Privacy Notice

Royal Hospital School

Independent Boarding and Day School for Boys and Girls

March 2021

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Related Policies	

INTRODUCTION

Royal Hospital School Enterprises Ltd. (RHSEL) is the trading arm of The Royal Hospital School (RHS)¹. RHS is an Independent Boarding/Day School operating as part of the part of the Greenwich Hospital Crown Charity².

This Privacy Notice is intended to cover all data processing in relation to RHSEL activities, which include:

- Commercial and community support lettings
- Sale of Merchandise from the Royal Hospital School Shop
- Online sale of merchandise via the Royal Hospital School and RHSEL websites

Under Data Protection Law³ RHSEL is designated a 'Data Controller', with a responsibility for procedures and privacy notices related to the control and processing of personal data. RHSEL is registered separately from the School with the UK data protection regulating authority – the Information Commissioner's Office (ICO) (Registration No. ZA426179). Notwithstanding its status as a data controller in its own right, RHSEL and its representatives will observe the overarching RHS policies and supervision related to data protection⁴.

WHAT THIS NOTICE IS FOR

This notice is intended to provide information about how the RHSEL will use and hold ("process") the personal data of its clients.

This information is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used.

RESPONSIBILITY FOR DATA PROTECTION

All individuals have a level of responsibility towards the protection of their own data and that of others.

Privacy and Compliance Officer. The Director of Finance and Strategic Development (Bursar) is the Privacy and Compliance Officer and is responsible for RHSEL Privacy and Compliance with overall responsibility for the execution of data control and the delivery and maintenance of data protection and GDPR compliance, including awareness/training, periodic data processing audits, access and retention checks, and the handling of subject access requests and personal data breaches. Privacy and Compliance enquiries should be made to the Head of Administration and Compliance at: compliance@royalhospitalschool.org

¹ An Independent Boarding/Day School located in Holbrook, Suffolk, IP9 2RX.

² Greenwich Hospital's head office is located at 1 Farringdon Street, London EC4M 7LG.

³ General Data Protection Regulation (GDPR) 25 May 2018.

⁴ School Data Protection Policy, Privacy Notice, Data Documentation, Information Security and Retention Policy etc.

In specific relation to RHSEL management of data protection, the processing of any personal and special category data is the responsibility of the Commercial Manager and the Deputy Bursar (Finance).

WHY RHSEL NEEDS TO PROCESS PERSONAL DATA

RHSEL has identified a 'legitimate interest'⁵ legal basis for the processing of personal data necessary for the administration and safety of its activities. Payment records including bank details and home addresses for items sold in the RHSEL shop. In addition, RHSEL may need to process special category personal data (e.g. concerning health information) or criminal records information (in relation to DBS checks) in accordance with the rights or duties imposed on it by statutory guidance⁶ or law, including as regards safeguarding and employment, or from time to time by explicit consent where required⁷.

RHSEL clients are asked to complete a 'Hire Agreement as part of the School's procedures prior to hire of the Schools premises/facilities. This states that all adults involved in the activity being held on school premises and in contact with children taking part in that activity, have been suitably checked as per statutory guidance.

GDPR places particular emphasis on protecting the personal data of children. Any required consent will be obtained in accordance with ICO GDPR guidance on age and data protection procedures.

WHO HAS ACCESS TO PERSONAL DATA AND WHO RHSEL SHARES IT WITH

Personal data collected by RHSEL will remain within RHSEL, and will only be processed by appropriate individuals in accordance with School access and security procedures⁸. No personal data will be forwarded/exported beyond those processors without the specific consent of the relevant individual.

HOW LONG WE KEEP PERSONAL DATA

RHSEL will retain client data on file for a minimum of 6 years beyond the duration of the business relationship.

YOUR RIGHTS

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 to the Head of Administration and Compliance in writing at compliance@royalhospitalschool.org

⁵ GDPR Article 6. Having conducted and recorded a GDPR Legitimate Interest Assessment (LIA).

⁶ Includes KCSIE Statutory Guidance 26 March 2015, as updated

⁷ GDPR Articles 9 and 10.

⁸ School Data Protection and Data Documentation, Information Security and Retention policies.

QUERIES AND COMPLAINTS

Any comments or queries in relation to this notice should be directed to the Head of Administration and Compliance at; compliance@royalhospitalschool.org If an individual believes that RHSEL has not complied with this notice or acted otherwise than in accordance with Data Protection legislation, they should notify the Head of Administration and Compliance in writing at; compliance@royalhospitalschool.org

RHSEL 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 before involving the regulator.