



PRIVACY NOTICE

Owner:	MB
Reviewed:	June 2024
Governor Approval:	June 2024
Next Review:	June 2025

1 INTRODUCTION

- 1.1 Lady Eleanor Holles School (referred to in this document as LEH or the School) is a company limited by guarantee and registered in England and Wales (Company Number: 6871042) and charity (Registered Charity Number: 1130254). Full contact details are provided on the School's website: www.lehs.org.uk.
- 1.2 In carrying out its day-to-day activities the School uses personal information about individuals including those referred to in 2.1. This makes the School a data controller and it is therefore required to adhere to all the terms of the General Data Protection Regulation as retained and applied in the UK ("UK GDPR") and Data Protection Act 2018 and all other data protection law and regulations ("Data Protection Law").
- 1.3 The School is committed to meeting its responsibilities to ensure compliance with Data Protection Law in accordance with this Privacy Notice.

2 THE PURPOSE OF THIS PRIVACY NOTICE

- 2.1 This Privacy Notice is intended to provide information about how the School will use (or "process") personal data about individuals including: its former, current, and prospective pupils and their parents, carers or guardians (referred to in this Privacy Notice as "parents").

The School also has:

- *a Summary Privacy Notice for Pupils to inform pupils how the School uses their data which they are made aware of and is available on the School's intranet;*
- *a separate Staff Privacy Notice providing information about how the School will process personal data about staff (including Governors);*
- *a separate Recruitment Privacy Notice providing information about how the School will process personal data of prospective applicants for roles; and*
- *a Privacy Notice (Development Office) providing information about how the School's Development Office will process personal data (this forms Schedule 3 to this Privacy Notice).*

- 2.2 This information is provided because Data Protection Law gives individuals rights to

understand how their data is used. Parents, pupils and staff are all encouraged to read this Privacy Notice and understand the School's obligations to its entire community.

- 2.3 This Privacy Notice applies alongside any other information the School may provide about a particular use of personal data, for example when collecting data via an online system or in paper form prior to a School trip or undertaking some counselling.
- 2.4 This Privacy Notice also applies in addition to the School's other relevant terms and conditions and policies, including the contract between the School and parents, the School's Data Retention Policy, the School's safeguarding, pastoral or health and safety policies and the School's IT policies.
- 2.5 Anyone who works for, or acts on behalf of, the School (including staff, volunteers, Governors and service providers) should also be aware of and comply with this Privacy Notice and the School's Data Protection Policy, which provides further information about how personal data about those individuals should be used and protected.

3 RESPONSIBILITY FOR DATA PROTECTION

- 3.1 The School has appointed the Director of Finance and Operations as the member of the School's senior management team who will deal with all your requests and enquiries concerning the School's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this Privacy Notice and Data Protection Law. The Director of Finance and Operations can be contacted at mberkowitz@lehs.org.uk.
- 3.2 The Director of Finance and Operations will work closely with other members of staff who have data protection responsibilities including the Head of IT Services, Data and Business Systems Manager, HR Director and Compliance Officer.

4 TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

This will include, by way of example:

- 4.1 Parents (former, current and prospective)
 - names, addresses, telephone numbers, e-mail addresses and other contact details;
 - employment details and bank details and other financial information, e.g. about parents (or others) who pay fees to the School and/or in relation to a bursary application;
 - information regarding a donation, records of payments made via the website (but the School does not store card details as these are processed securely externally by a third-party payment provider) and, and any source of funds and/or anti-money laundering information the School is required to collect by law;

- information on participation in School events, emails, surveys and general correspondence with and concerning parents; and
- in relation to former parents: consent options and other communication preferences.

4.2 Pupils (former, current and prospective)

- names and contact details;
- where appropriate, information about individuals' health and welfare;
- pupils' academic, disciplinary, admissions, safeguarding and attendance records (including information about any special needs), and examination scripts and marks;
- references given or received by the School about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- correspondence with and concerning pupils;
- images of pupils (and occasionally other individuals) engaging in School activities, and images captured by the School's CCTV system (in accordance with the Schedules to this Notice);
- biometric information, which will be collected and used by the School in accordance with the information provided to parents when the pupils start at the School;
- travel documentation for overseas visits;
- car details (about those who use the School's car parking facilities);
- donation details and a record of payments made via the website (but the School does not store card details as these are processed securely externally by a third-party payment provider), and
- information on participation at School events, emails, surveys and general correspondence.

4.3 Other

- where appropriate, contact details for pupils' emergency contacts (next of kin or otherwise);
- contact details of suppliers, service providers and third parties providing support and services to the School; and
- images of individuals engaging in activities on the School site, and images captured by the School's CCTV system (in accordance with the School's Policy on CCTV as set out in Schedule 2 to this Notice).

5 HOW THE SCHOOL COLLECTS DATA

- 5.1 Generally, the School receives personal data from the individual directly (including, in the case of pupils, from their parents). In relation to parents and pupils, this may occur at various times before during and after a pupil attends the School and through various points of contact with the School (e.g., careers, development office, boat club etc.).
- 5.2 This may be via a form (e.g. through the website, Operoo or parent portal), when attending an event, or simply in the ordinary course of interaction or communication (such as email or written assessments).
- 5.3 However in some cases personal data will be supplied by third parties (for example: another School, doctors, or other professionals or authorities working with that individual).

6 WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

- 6.1 In order to carry out its ordinary duties to pupils and parents, the School needs to process a wide range of personal data about individuals (including current, past and prospective pupils or parents) as part of its daily operation.
- 6.2 Some of this activity the School will need to carry out in order to fulfil its legal rights, duties or obligations, including those under a contract with parents of its pupils.
- 6.3 Other uses of personal data will be made in accordance with the School's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data.
- 6.4 The School expects that the following uses will fall within that category of its (or its community's) "legitimate interests":
- For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents) and retain a record if appropriate for the purposes of future applications or place openings;
 - To carry out credit, identity and source of funds checks, including for the purposes of verifying that parents are not subject to (or within the purview of) sanctions;
 - To provide education services, including musical education and physical training, career services, and extra-curricular activities to pupils, School visits (including international travel), monitoring pupils' progress and educational needs and processing entries for public examinations, music and drama extra-curricular examinations and university admissions testing, including where such services are provided remotely (either temporarily or permanently);
 - To report to and liaise with parents about their child's progress, welfare and development including by way of regular reports and parents' evenings.

- To organise and manage meetings, events and social engagements for pupils and parents;
- To maintain relationships with the School community, by sending invites to events, newsletters, direct marketing and fundraising activity (e.g., processing donations);
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law;
- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past and current pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the School;
- To safeguard pupils' health and welfare and provide appropriate pastoral care (including following the requirements and recommendations of the government's guidance on Keeping Children Safe in Education);
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's Staff Acceptable Use of IT Policy and the Acceptable Use of IT Policies (Senior and Junior Schools);
- To make use of photos and videos of pupils in School publications, and on the School's website and social media channels for educational or marketing and promotional purposes in accordance with the School's Policy on Taking, Storing and Using Images of Children as set out in Schedule 1 to this Notice;
- For the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities;
- To carry out or cooperate with any School or external complaints, disciplinary or investigation process;
- To promote the School to prospective parents and pupils; and
- Where otherwise reasonably necessary for the School's purposes, including to: undertake market research, and obtain appropriate professional advice and insurance for the School.

6.5 In addition, the School will on occasion need to process special category personal data (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks on parents hosting exchange students) in accordance with rights or duties imposed on it by law, including as regards safeguarding, or from time to time by explicit consent where required. These reasons will include:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for emergency medical care, to arrange the assessment and diagnosis of a pupil's health and medical conditions, e.g. special educational needs, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of School trips who need to be made aware of dietary or medical needs;
- To comply with any public health testing requirements;
- To provide educational services (including those set out in 6.4 above) in the context of making reasonable adjustments for a pupil's disability and/or any special educational needs of a pupil;
- To run any of its systems that operate on biometric data, such as for entry security and other forms of pupil identification (payment for lunch etc.);
- As part of any School or external complaints, disciplinary or investigation process that involves such data, for example if there are SEND, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring, immigration compliance and health and safety) and to comply with its legal obligations and duties of care.

7 WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL SHARES IT WITH

7.1 For the most part, personal data collected by the School will remain within the School and will be processed by appropriate individuals only in accordance with access protocols (i.e., on a 'need to know' basis). Particularly strict rules of access apply in the context of "special category" data, most notably:

- Medical records: The School needs to process such information to comply with statutory duties and keep pupils and other safe, and the School will ensure only authorised staff can access this information (e.g. School Nurses or School Counsellors) but this may include wider dissemination if needed, e.g. for School trips or for catering purposes.
- Pastoral or safeguarding files: Staff, pupils and parents are reminded that the School is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, low level concern records, and in some cases referrals to relevant authorities such as the LADO or police. For further information about this, please view the Safeguarding (Child Protection) Policy. KCSIE requires that, whenever a child leaves the School to join another school or college, his or her child protection

file is promptly provided to the new organisation, along with any other information which the School's Designated Safeguarding Lead considers material to the ongoing care needs of any pupil. Where appropriate, the School will consult with parents as to how these needs are best served, but ultimately the decision as to what information is necessary to share with the new school or college is a safeguarding question that must be reserved to the School. The School will retain a copy in accordance with its Data Retention Policy for material related to safeguarding matters.

- SEND records: A certain amount of any SEND pupil's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

7.2 Occasionally, the School will need to share personal information with third parties, such as:

- professional advisers (e.g., lawyers, insurers, PR advisers and accountants);
- appropriate contractors such as visiting music teachers;
- third parties to facilitate your purchase of optional insurances, iPads and School uniform;
- government authorities (e.g., HMRC, DfE, CAFCASS, police, Home Office, a relevant public health/NHS body and/or local authority) and appropriate regulatory bodies (e.g., Teacher Regulation Authority, the Independent Schools Inspectorate, the Charity Commission or the Information Commissioner);
- a third-party organisation to assist with the School's bursary application assessment process;
- another school when a pupil leaves to attend another school;
- various specialists and advisors who assist the School in fulfilling its obligations and may need a pupil's information if this is relevant to the support they provide;
- organisations such as examinations boards, extra-curricular music and drama examination boards and university admissions testing providers, school visit providers, other schools including Hampton School and/or competition organisers in connection with learning and extra-curricular activities of pupils;
- Stage 3 complaints panels that will include Governors and independent panel members (in accordance with the School's Complaints Policy); and
- trading subsidiaries, suppliers or service providers who provide services to LEH (coach service, caterers etc.).

7.3 The School may send your personal data to other countries, including countries outside the EEA, for example when sending references or organising overseas visits.

7.4 In addition, in accordance with Data Protection Law, some of the School's processing activity is outsourced and carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. Wherever possible, this is always subject to contractual assurances that personal data will be kept securely and only in

accordance with the School's specific directions.

8 HOW LONG THE SCHOOL KEEPS PERSONAL DATA

- 8.1 The School will retain personal data securely and only in line with how long it is necessary to keep for the relevant activity. Typically, the legal recommendation for how long to keep ordinary pupil personnel files is up to 7 years following departure from the School. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements. Furthermore, the Independent Inquiry into Child Sexual Abuse (IICSA) has recommended that records relating to allegations of child sexual abuse should be kept for 75 years.
- 8.2 If you have any specific queries about how the School's Data Retention Policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Director of Finance and Operations on mberkowitch@lehs.org.uk. However, please bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data even following such request.
- 8.3 A limited and reasonable amount of information will be kept for archiving purposes, for example, and even where you have requested the School no longer keeps in touch with you, the School will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").

9 KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

Some departments in the School (primarily the development and careers offices) will use the contact details of parents (current/former), alumnae and other members of the School community to keep them updated about the activities of the School, or alumnae/parent events of interest e.g., careers, including by sending updates (magazines and newsletters etc.) by email and by post. The School may also contact parents and/or alumnae by post and email in order to promote and raise funds for the School and collect information from publicly available sources about parents' and former pupils' occupation and activities, in order to maximise the School's fundraising potential. In addition, the School may use publicly available information (e.g. LinkedIn), and/or use additional information such as geographical information and measures of affluence to ensure communications, invites and requests for support are appropriate and may interest the recipient (see also the Privacy Notice (Development Office) for more information).

10 YOUR RIGHTS

- 10.1 Individuals (both parents and pupils) have various rights under Data Protection Law to access and understand their own personal data held and processed by the School, and in some cases ask for it to be erased or amended or to have it transferred elsewhere, or for the School to stop processing it - but subject to certain exemptions and limitations.

10.2 The School will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is generally one month but actually fulfilling more complex or multiple requests e.g., those involving third party information may take up to two months longer).

10.3 Rights of access, etc.

10.3.1 The School will be better able to respond quickly to smaller, targeted requests for information made during term time. If the request for information is manifestly excessive or similar to previous requests, the School may ask you to reconsider, or require a reasonable fee for the administrative costs of complying with the request, or in certain cases refuse the request (but only where Data Protection Law allows it, and in accordance with relevant regulatory guidance).

10.3.2 If you consider that the personal data the School holds on you is inaccurate, please let the School know. However, the School will not necessarily delete or amend views, opinions, notes or records purely on the request on an individual who disputes the account, although the School may keep a record of all parties' viewpoints.

10.4 Requests that cannot be fulfilled

10.4.1 You should be aware that UK GDPR rights (including the right of access) are limited to your own personal data, and certain data is exempt. This will include information which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations - please see further below), or information which is subject to legal privilege (for example legal advice given to or sought by the School, or documents prepared in connection with a legal action, or where a duty of confidence is owed by a legal adviser).

10.4.2 The School is also not required to disclose any pupil examination scripts (or other information consisting solely of pupil test answers), potentially including mock exam scripts or other types of exams/tests used to assess performance. The School is also not required to provide examination or other test marks ahead of any ordinary public exams publication date, nor share any confidential reference held by the School that was (or will be) given for the purposes of the education of any individual.

10.4.3 You may have heard of the "right to be forgotten". However, the School will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a proportionate legitimate interest identified in this Privacy Notice. Generally, if the School still considers the processing of the personal data to be reasonably necessary, it is entitled to continue. All such requests will be considered on their own merits.

10.5 Requests by and on behalf of Pupils

10.5.1 Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the School, they have sufficient maturity to understand the request they are making (see section Whose Rights? below). A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

10.5.2 Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger pupils, the law still considers the information in question to be the child's. For older pupils, the parent making the request may need to evidence their child's authority for the specific request. Requests not considered by the School in the child's best interests may sometimes be refused.

10.5.3 Pupils at Senior School are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home. Slightly younger children may however be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

10.6 Parental requests, etc.

10.6.1 It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about pupils without their consent. The School may consider there are lawful grounds for sharing with or without reference to that pupil.

10.6.2 Parents will in general receive educational and pastoral updates about their children, in accordance with their contract with the School. Where parents are separated, the School will in most cases aim to provide the same information to each person with parental responsibility, but may need to factor in all the circumstances including the express wishes of the child, court orders, or pastoral issues.

10.6.3 All information requests from, on behalf of, or concerning pupils - whether made under subject access or simply as an incidental request - will therefore be considered on a case-by-case basis.

10.7 Consent

10.7.1 Where the School is relying on consent (e.g., for biometrics) as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Please be aware however that the School may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

10.7.2 That reason will usually have been asserted under this Privacy Notice or may otherwise exist under some form of contract or agreement with the individual (e.g., a contract with the School).

10.8 Whose rights?

10.8.1 The rights under Data Protection Law belong to the individual to whom the data relates. However, the School will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils - for example, under a contract with parents, or via a form. Parents and pupils should be aware that this is not necessarily the same as the School relying on strict consent (see section on Consent above).

10.8.2 Where consent is required, it may in some cases be necessary or appropriate - given the nature of the processing in question, and the pupil's age and understanding - to seek the pupil's consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

10.8.3 In general, the School will assume that pupils' consent is not required for ordinary disclosure of their personal data to their parents, e.g., for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare. That is unless, in the School's opinion, there is a good reason to do otherwise.

10.8.4 However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the School may be under an obligation to maintain confidentiality unless, in the School's opinion, there is a good reason to do otherwise; for example, where the School believes disclosure will be in the best interests of the pupil or other pupils, or if required by law.

10.8.5 Pupils are required to respect the personal data and privacy of others, and to comply with the Acceptable Use of IT Policies (Senior and Junior Schools) and the School Rules. Staff are under professional duties to do the same under the School's Data Protection Policy.

11 **DATA ACCURACY AND SECURITY**

11.1 The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify the Director of Finance and Operations of any significant changes to important information, such as contact details, held about them.

11.2 An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and

limitations under Data Protection Law).

- 11.3 The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to School systems. All staff and Governors will be made aware of this Privacy Notice and their duties under Data Protection Law and receive relevant training.

12 UPDATES

The School will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

13 QUERIES AND COMPLAINTS

- 13.1 Any comments or queries on this Privacy Notice should be directed to the Director of Finance and Operations at mberkowitz@lehs.org.uk or at LEH, Hanworth Road, Hampton, TW12 3HF.
- 13.2 If an individual believes that the School has not complied with this Privacy Notice or acted otherwise than in accordance with Data Protection Law, they should notify the Director of Finance and Operations (details above). Such an individual 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 with the School before involving the regulator.

SCHEDULE 1

POLICY ON TAKING, STORING AND USING IMAGES OF CHILDREN

1 INTRODUCTION

- 1.1 This Schedule provides information about how images (which shall include videos and audio) of pupils (and other individuals) are normally used by the School.
- 1.2 It applies in addition to the School's Parent Contract, Schedule 2 to this Notice and any other information the School may provide about a particular use of images, including for example signage about the use of CCTV; and more general information about use of pupils' personal data, e.g., the School's Privacy Notice (to which this is a Schedule).
- 1.3 Certain uses of images are necessary for the ordinary running of the School; other uses are in the legitimate interests of the School and its community and unlikely to cause any negative impact on children. Examples include videos taken of lessons for professional review of staff. teaching and learning purposes, sharing best practice etc.; and taking images of School concerts and performances. The School is entitled lawfully to process such images and take decisions about how to use them, subject to any reasonable objections raised. In some circumstances, according to the reasons for videoing the lessons, the School may seek consent.

2 USE OF PUPIL IMAGES IN SCHOOL PUBLICATIONS, ONLINE AND THE MEDIA

- 2.1 The School will use images of its pupils to keep the School community updated on the activities of the School, and for marketing and promotional purposes, including:
 - 2.1.1 on internal displays (digital and conventional notice boards) within the School premises;
 - 2.1.2 in communications (such as the School newsletter) with the School community (parents, pupils, staff, Governors and alumnae) including by email, on the School intranet and by post;
 - 2.1.3 on the School's website and, where appropriate, via the School's social media channels which may include X (formerly known as Twitter), Instagram, YouTube and Facebook and any social media sites used by the School's wider community including other schools (e.g., Hampton School) and school associations, to share updates about academic competitions and sports' results for example;
 - 2.1.4 in the School's prospectus, magazines and newsletters etc. and in online, press and other external advertisements for the School; and
 - 2.1.5 with the School's permission, use by Hampton School in promotional material and marketing of joint activities between the School and Hampton School.

and the School may continue to use any photos and videos after the pupil has left the School.

- 2.2 Photos may capture children or other individuals who are not pupils in a wider shot, but these will only be used where the images of individuals are not clearly identifiable.
- 2.3 The source of these images will predominantly be the School's staff (who are subject to policies and rules on how and when to take such images as set out in Appendix 4 of the Safeguarding (Child Protection) Policy), or a professional photographer or videographer for marketing and promotional purposes, or occasionally pupils. The School will only use images of pupils in suitable dress.
- 2.4 Any parent who wishes to limit the use of images of a pupil for whom they are responsible should contact the Director of Development & Communications (lday@lehs.org.uk) in writing. The School will respect the wishes of parents/carers (and indeed pupils themselves) whenever reasonably possible, and in accordance with this Privacy Notice and Schedule).
- 2.5 The media may attend events or school activities in which the School pupils are participating (both on and off site) in which case pupils may be included in media photos/videos from such an event, but the School will not directly provide pupil names for use by the media with such images without the consent of the parents or pupils (as applicable).

3 USE OF PUPIL IMAGES FOR IDENTIFICATION AND SECURITY

All pupils are photographed on entering the School and, thereafter, at approximately three-yearly intervals, for the purposes of internal identification. These photographs identify the pupil by name and are contained within the School's management information system.

4 SECURITY OF IMAGES

- 4.1 Professional photographers, videographers and the media are accompanied at all times by a member of staff when on School premises. The School uses only reputable professional photographers, videographers and makes every effort to ensure that any images of pupils are held by them securely, responsibly and in accordance with the School's instructions.
- 4.2 The School takes appropriate technical and organisational security measures to ensure that images are kept securely, and protected from loss or misuse, and in particular will take reasonable steps to ensure that members of staff only have access to images where it is necessary for them to do so.
- 4.3 All staff are given guidance on the School's Policy on Taking, Storing and Using Images of Children, and on the importance of ensuring that images of pupils are made and used responsibly, only for School purposes, and in accordance with the School's policies and the law.

5 USE OF CAMERAS AND FILMING EQUIPMENT (INCLUDING MOBILE PHONES) BY PARENTS

5.1 Parents, guardians or close family members (hereafter, parents) are welcome to take photographs of (and where appropriate, film) their own children taking part in School events, subject to the following guidelines, which the School expects all parents to follow:

- When an event is held indoors, such as a play or a concert, parents should be mindful of the need to use their cameras and filming devices with consideration and courtesy for cast members or performers on stage and the comfort of others. Flash photography can disturb others in the audience, or even cause distress for those with medical conditions; the School therefore asks that it is not used at indoor events.
- Parents are asked not to take photographs of other pupils, except incidentally as part of a group shot, without the prior agreement of that pupil's parents.
- Parents are reminded that such images are for personal use only. Images which may, expressly or not, identify other pupils should not be made accessible to others via the internet (for example on Facebook), or published in any other way.
- Parents are reminded that copyright issues may prevent the School from permitting the filming or recording of some plays and concerts. The School will always print a reminder in the programme of events where issues of copyright apply.
- Parents may not film or take photographs in changing rooms or backstage during School productions, nor in any other circumstances in which photography or filming may embarrass or upset pupils.

5.2 The School reserves the right to refuse or withdraw permission to film or take photographs (at a specific event or more generally), from any parent who does not follow these guidelines, or is otherwise reasonably felt to be making inappropriate images.

5.3 The School sometimes records plays and concerts professionally (or engages a professional photographer or film company to do so), in which case CD, DVD or digital copies may be made available to parents for purchase. Parents of pupils taking part in such plays and concerts will be consulted if it is intended to make such recordings available more widely.

SCHEDULE 2

CCTV POLICY

1 INTRODUCTION

- 1.1 Images of individuals recorded by the CCTV cameras on School premises are personal data which must be processed in accordance with data protection laws.
- 1.2 The CCTV system is administered and managed by the School, which is the controller in respect of personal data collected by its CCTV cameras. The School will review the ongoing use of existing CCTV cameras regularly to ensure that their use remains necessary and appropriate, and that the system is continuing to address the needs that justified its introduction.

2 USE OF CCTV

- 2.1 Having fully considered the privacy rights of individuals, the School believes the following purposes for using CCTV are all in its legitimate interests. Data captured for these purposes will not be used for any commercial purpose.
- To protect the personal safety of the School community and to act as a deterrent against crime.
 - To protect personal property, School buildings and equipment from damage, disruption, vandalism and other crime.
 - To prevent and detect crime, and support law enforcement bodies in the prevention, detection and prosecution of crime as well as the identification and apprehension of offenders.
 - To monitor the security and integrity of the School site and deliveries and arrivals, including car parking and number plate recognition.
 - To investigate, where appropriate, staff and contractors when carrying out work duties.
 - To uphold discipline among pupils in line with the School Rules.
 - To assist in day-to-day management, including ensuring the health, welfare, wellbeing and safety of the School community.

This list is not exhaustive; other purposes may become relevant from time to time.

- 2.2 Locations for the CCTV cameras have been selected, both inside and outside School premises, that the School reasonably believes require monitoring to address the above objectives.
- 2.3 Signage has been placed in prominent positions around the premises to inform pupils, parents, staff and visitors that they are entering a monitored area, identifying the School as the controller operating the CCTV system and including contact details for further information regarding the CCTV system.

- 2.4 These locations have been chosen to minimise viewing of spaces not relevant to the legitimate purposes of the School's monitoring. Surveillance systems will not be used to record sound and no images will be captured from areas in which individuals would have a heightened expectation of privacy.
- 2.5 The CCTV system will be operational 24 hours a day, every day of the year. Authorised personnel will check and confirm that the CCTV system is properly recording and that cameras are functioning correctly, on a regular basis. The CCTV system will be checked and serviced regularly.
- 2.6 Recorded images are only viewed by approved members of staff whose roles require them to have access to such data. This may include security, compliance and safeguarding / pastoral staff. Staff using the CCTV system will be given appropriate training to ensure that they understand and observe the legal requirements related to the processing of relevant data. Images will only be viewed and/or monitored in a suitably secure and private area.

3 SECURITY AND STORAGE

- 3.1 In order to ensure that the rights of individuals recorded by the CCTV system are protected, the School takes appropriate technical and organisational security measures to ensure that data gathered by CCTV cameras is stored in a way that maintains its integrity and security.
- 3.2 Images will be stored for 4 weeks, and **automatically over-written** unless the School considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required to retain such data (for example, by an appropriate third party such as the police or local authority). Where personal data collected by the CCTV system is retained, it will be held in accordance with data protection law and the School's Data Protection Policy.
- 3.3 No images from CCTV cameras will be disclosed to a third party without express permission being given by the School. The School will keep records of any such disclosures. The following are examples of circumstances in which the School may authorise disclosure of CCTV images to third parties:
- Where required to do so by the police or any relevant local or statutory authority;
 - To make a report regarding suspected criminal behaviour or a safeguarding incident;
 - To enable the Designated Safeguarding Lead or their appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
 - To assist the School in establishing facts in cases of unacceptable pupil behaviour,
 - To the School's insurance company or a third party's insurance company where required in order to pursue a claim (for example for damage to insured property).

SCHEDULE 3

PRIVACY NOTICE (Development Office including Holles Connect)

1 INTRODUCTION

- 1.1 The School's Development Office supports the School in the creation and maintenance of good relationships between the School community, alumnae and former parents and staff primarily through Holles Connect. It also co-ordinates fundraising for bursary programmes and School projects. As such, the Development Office holds data about former pupils, current and former parents and current and former members of staff/Governors together with other individuals connected with the School.
- 1.2 The purpose of this Schedule is to explain in more detail how the Development Office stores, manages and protects your personal data. This information should be read in conjunction with the School's Privacy Notice to which this forms a Schedule.

2 TYPES OF PERSONAL DATA PROCESSED BY THE DEVELOPMENT OFFICE AND HOW IT IS COLLECTED

- 2.1 Examples of the personal data which the Development Office might hold include:
- Name, gender and date of birth and contact details such as addresses, telephone numbers, e-mail addresses;
 - Consent options and communication preferences;
 - Education history, professional activities, employment details, interests;
 - Support activity for the School e.g., mentoring, careers advice;
 - Information you have shared publicly on social media;
 - Information on participation in School events, response to surveys and general correspondence with the Development Office;
 - images of individuals engaging in School events, and images captured by the School's CCTV system (in accordance with the School's Policy on CCTV as set out in Schedule 2 above); and
 - information regarding donation(s), records of payments made via the website and, and any anti money laundering information the School is required to collect by law.
- 2.2 The Development Office may acquire this personal data in a number of ways. For example:
- Some information you provide to the School generally, such as contact details, will also be held by the Development Office. In relation to parents and pupils, this may occur at various times before, during and after a pupil attends the School.

- Staff and pupils (on leaving) can register on the School’s alumnae database (Holles Connect) where they can post content and/or update their online profile.
- Data may also be collected when you attend an event, make a donation, engage with the School’s social media channels or simply in the ordinary course of interaction or communication (such as email).
- The Development Office may carry out research, including by using publicly available, credible and verifiable sources of information in the preparation of internal documents, taking care and with due diligence.
- In addition, the Development Office may collect publicly available information (e.g. LinkedIn), and/or use additional information such as geographical information and measures of affluence to ensure communications, invitations and requests for support are appropriate and may interest the recipient.

3 HOW THE DEVELOPMENT OFFICE PROCESSES THE PERSONAL DATA

3.1 Together with the uses outlined at 6.4 of the School’s Privacy Notice, the School expects that the following uses will fall within the category of its “legitimate interests”:

- To keep parents (current/former), alumnae and other members of the School community updated about the activities of the School, including fundraising activities, by sending updates including magazines and newsletters etc. by email and by post.
- Event management;
- Processing of donations;
- Acting as an intermediary to connect alumnae with each other, with each party’s agreement;
- The provision of careers and mentoring services, with a subject’s agreement;
- Undertaking donor due diligence, including carrying out identity and source of funds checks regarding donations or gifts.

3.2 The Development Office may also share personal data with other departments within the School (e.g., careers department). In addition, in accordance with Data Protection Law, some of the School’s processing activity is outsourced and carried out on its behalf by third parties, such as IT systems, or cloud storage providers. Wherever possible, this is always subject to contractual assurances that personal data will be kept securely and only in accordance with the School’s specific directions.

3.3 From time to time the Development Office may ask for your consent to processing your personal data. Should you wish to limit or object to any such use, or would like further information, please contact the Director of Development and Communications at fundraising@lehs.org.uk (see below).

- 3.2 As part of keeping in touch, some individuals may choose to join the School’s online community by registering on the Holles Connect website and creating an online profile. If you have an online profile with Holles Connect you can update your consent options by logging-in and clicking on “My Settings” in your profile. Via “My Settings” you can also choose to hide your profile from Google, limit access to your profile so that it is only viewable to your Holles Connect connections and adjust some of the automatic notifications that you receive from this website. Please note that your name (but not your full profile) may appear in various places around the website, for example in “search” results, irrespective of the privacy setting you have selected.

4 HOW THE DEVELOPMENT OFFICE KEEPS PERSONAL DATA

- 4.1 The Development Office will retain personal data securely; the Development Office uses a separate database from other departments at the School. The Development Office will only retain the data to the extent necessary for the relevant activity.
- 4.2 Data will not be disclosed to external organisations other than those with which the School is required to share information (such as HMRC) or suppliers or service providers who provide services for the School/Development Office and with whom the School has data sharing agreements.
- 4.3 Please note that the School does not store any credit/debit card details after processing payments.

5 YOUR RIGHTS

- 5.1 Should you wish to limit or object to any such use of your data, or would like further information, please contact the Director of Development and Communications at fundraising@lehs.org.uk. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising and you can update your communication preferences on Holles Connect (see paragraph 3.3). However, as above, the School is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number). The School will also need to retain some information to comply with statutory requirements e.g., Gift Aid declarations.
- 5.2 Please refer to the School’s Privacy Notice above for information on individuals’ rights under Data Protection Law. If you have any comments or queries on this Schedule, or should you wish to exercise any of your rights, please contact either the Director of Development and Communications (fundraising@lehs.org.uk) or the Director of Finance and Operations (mberkowitz@lehs.org.uk).