



GREENFIELD SCHOOL

How We Use Your Information - Privacy Notice for All 2024-2025

Who we are

We, Greenfield School, Old Woking Road, GU22 8HY, registered company number 02035304 and registered charity number 295145, are the “data controller” for the purposes of Data Protection Law.¹

What this Privacy Notice is For

This Privacy Notice is intended to provide information about how the School will use and hold (or “process”) personal data about individuals including:

- Current, Past and Prospective Pupils
- Parents/Guardians (referred to in this policy as parents)
- Staff
- Volunteers (including Governors)
- Job Applicants
- Visitors to site

Collectively, we refer to these individuals in the Privacy Notice as the School’s community.

This makes the School a data controller of your personal information and this information is provided because data protection law gives individuals rights to understand how their data is processed. This Privacy Notice sets out how we will use that information and what your rights are in respect of the data we hold about you.

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 or paper form.

This Privacy Notice also applies in addition to the School’s other relevant terms and conditions and policies, including:

- Any contract between the school and its staff, or the parents of pupils
- Any policies or notices applicable to staff concerning the handling of personal data
- The school’s policy on taking, storing and using images/videos of children
- The School’s CCTV Policy
- The School’s Data Retention Policy

¹ The General Data Protection Regulation 2016/679 and the Data Protection Act 2018

- The School's disciplinary, safeguarding, pastoral, anti-bullying, or health and safety policies, including as to how concerns, low-level concerns or incidents are reported or recorded
- The School's Data Protection Policy
- The School's Staff Acceptable Use of Email, Internet and Communication Systems, Pupil's Acceptable Use of ICT, eSafety Policy, Staff Remote Working Policy

Anyone who works for, or acts on behalf of, the School (including Staff, Volunteers, Governors and Service providers) will be subject to suitable training and/or policies commensurate with their role.

Responsibility for Data Protection

The School has appointed the Bursar as the Data Protection Lead who will deal with all of 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 policy and Data Protection Law.

Please contact bursar@greenfield.surrey.sch.uk if you have any questions about this Policy.

Why the School needs to process Personal Data

In order to carry out its ordinary duties to the School Community, the school needs to process a wide range of personal data about our community as part of our daily operation.

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 its staff, or parents of its pupils.

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.

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, to confirm the identity of prospective pupils and their parents, and retain a record, if appropriate, for the purposes of future applications or openings;
- To provide education services, including musical education or physical education, career services and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs 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;
- Maintaining relationships with alumni and the School Community, including direct marketing or fundraising activity;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax and equality 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 Email, Internet and Communication Systems;
- To make use of photographic images of pupil in school publications, on the School website and (where appropriate) on the School's social media channels in accordance with the School's policy on taking, storing and using images/videos of children;
- For security purposes, including CCTV in accordance with the School's CCTV Policy;
- 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;
- For regulatory record keeping in respect of immigration requirements as an employer and a visa sponsor;
- To carry out or co-operate with any School or external complaints, disciplinary or investigation processes;
- To promote the School to prospective parents; and
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School.

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) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, 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 interest to do so: for example for medical advice, for social protection, safeguarding, and co-operation 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 public health requirements;
- To provide educational services in the context of making reasonable adjustments of a pupil's disability and/or special educational needs;
- In connection with employment of its staff, for example DBS checks, welfare, union membership or pension plans;
- 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);

- For legal and regulatory purposes (for example, child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care to the School Community.

Types of Personal Data processed by the School

This will include by way of example:

- Names, addresses, telephone numbers, e-mail addresses and other contact details;
- Car details (about those who use our car parking facilities);
- Bank details and other financial information (e.g. about parents (or others) who pay fees to the School, and any source of funds and/or anti-money laundering information we are required to collect by law)
- Past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- Nationality and immigration status information (e.g. right to enter, live and work in the UK), including copies of passport information;
- Information about health and medical conditions, SEN and family circumstances;
- Personnel files, including in connection with staff, employment or safeguarding requirements;
- Contact details for their next of kin;
- References given or received by the School about its pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- References given or received by the School about its staff;
- Correspondence with, and concerning, staff, pupils, parents and volunteers past and present;
- Images of pupils (and occasionally other individuals) engaging in school activities and images of the School's Community by the School's CCTV system (in accordance with the School's policy on taking, storing and using images)

How the School Collects Data

Generally, the School receives personal data from the individual directly (including, in the case of pupils, from their parents). This maybe via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

However, in some cases, personal data will be supplied by third parties (for example another school, or other professionals or authorities working with that individual); or collected from publicly available resources.

Who has access to Personal data and who the School shares it with

Processing by Third Parties

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). However, some functions are outsourced including accounting software, payroll, booking of wrap around care and parents' evening, Cloud storage, auditors, inspectors, the School's chosen management information system and the School's chosen Safeguarding, Pastoral and

wellbeing management software. In accordance with Data Protection Law, this type of external data processing is always subject to contractual assurances that personal data will be kept securely and used only in accordance with the School's specific directions.

Data Sharing

Occasionally, the School, including its Governing Body, will need to share personal information relating to the School Community with Third Parties, such as:

- Friends of Greenfield School;
- Appropriate contractors, such as visiting music teachers and club providers;
- Professional advisers (e.g. lawyers, insurers, payroll provider, Bursary administration provider and auditors);
- Examination boards;
- Stage 3 complaints panels, which will include independent panel members such as when a complaint is raised (and in accordance with the School Complaints Procedure, this requires the involvement of independent panel members);
- Third parties and their advisers in the event of a possible or actual sale, merge or other restructuring of the school; and
- Government authorities (e.g. HMRC, DfE, CAF/CASS, Police, Home Office, a relevant public health/NHS Body and/or Local Authority) and/or appropriate regulatory bodies e.g. the Teaching Regulation Agency, the Independent Schools Inspectorate, Companies House and the Charities Commission.

Access to, and sharing of, Sensitive Data

Particularly strict rules of access apply in the context of "Special Category" data, most notably:

- Health and Medical Records and SEN records; and
- Pastoral or safeguarding files

Medical Data

The School needs to process such information to comply with statutory duties and to keep the School Community safe, but the School will ensure only authorised Staff can access information on a need-to-know basis. This may include wider dissemination if needed for School trips or for Catering purposes. Express consent will be sought where appropriate. However, a certain amount of any relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that a pupil requires.

Safeguarding data

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 or seriousness in their nature or regulatory. This is likely to include file notes on personnel or safeguarding files, low-level concerns records kept about adults (which may include references to pupils or family members), and in some cases referrals to relevant authorities such as the LADO, Children's Services, CAMHS or the Police.

KCSIE also requires that, whenever a child leaves the School to join another School, their child protection file is promptly provided to the new organisation, along with any information which the School DSL considers material to the ongoing care needs of any pupils. 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 is a safeguarding question that must be reserved for the School. The School will retain a copy of the child protection file in accordance with its Data Retention Policy for material related to safeguarding matters.

For further information about this, please view the School's Safeguarding Policy.

How long we keep personal data for

The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary staff and pupil personnel files is up to 7 years following departure from the School. However, incident reports and safeguarding files will be kept much longer in accordance with specific legal requirements.

If you have any specific queries about how the 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 bursar@greenfield.surrey.sch.uk. However, please bear in mind that the School will often have lawful and necessary reasons to hold onto some personal data even following such a request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of that fact in order to fulfil your wishes (called a "suppression record").

Keeping in touch and supporting the School

The School will use the contact details of parents, alumni and other members of the School Community to keep them updated about the activities of the School, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the School will also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the School Community, such as the Friends of Greenfield School;
- Contact parents and/or alumni by post and email in order to promote and raise funds for the School;

Should you wish to limit or object to any such use, or would like further information about them, please contact bursar@greenfield.surrey.sch.uk. You always have the right to withdraw consent, where given, or otherwise object to marketing or fundraising material. However, the School is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular contact detail);

Your rights

You have the following rights:

- To obtain access to, and copies of, the personal data that we hold about you;
- To require us to correct the personal data we hold about you if it is incorrect;
- To requires us (in certain circumstances) to erase your personal data;
- To request that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- To object on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. The School will endeavour to respond to any such 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 1-2 months longer).

Data Accuracy and Security

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 schooloffice@greenfield.surrey.sch.uk of any significant changes to important information, such as contact details, held about them.

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): please see above for details of why the School may need to process your data, and who you may contact if you disagree.

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.

This Policy

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.

Queries and Complaints

Any comments or queries on this policy should be directed to bursar@greenfield.surrey.sch.uk.

If an individual believes that the School has not complied with this Policy or acted otherwise than in accordance with Data Protection Law, they should utilise the School's Complaints Procedure and should also notify bursar@greenfield.surrey.sch.uk. You 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.

September 2024



Chair

Janet Day

Chair of the Board of Governors

To be reviewed September 2025