

Privacy Notice

Notice Area	Data Protection
Author	Head of School
Relevant Statutory Regulations	General Data Protection Regulation (GDPR) (EU) 2016/679
Senior Team Lead	Head of School
Version	2018.01
Last Updated	24 May 2018
Review Date	As required

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1 WHO ARE WE?

Roedean Moira House is an independent girls' day and boarding school. Roedean Moira House is a registered charity (Charity Commission reference number: 307072) and is also a Royal Charter corporation.

Our postal address is: Roedean Moira House Upper Carlisle Road Eastbourne East Sussex BN20 7TE. You can contact us: +44 (0)1323 644144 or by email: schooloffice@moirahouse.co.uk

This Privacy Notice sets out how Roedean Moira House uses and protects any information that you give us when you use this website or by any other means.

Roedean Moira House is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, or by any other means, then you can be assured that it will only be used in accordance with this Privacy Notice.

Roedean Moira House may change this notice from time to time by updating it on the website. You should check the website from time to time to ensure that you are happy with any changes. Where there are substantial changes that will affect your rights, they will be provided to you as far as is reasonably practicable. This notice is effective from May 2018.

2 WHAT IS THIS PRIVACY NOTICE FOR?

- 2.1 This notice is intended to provide information about how the school will use (or "process") personal data about individuals including: its current and prospective staff; its current and prospective pupils; and their parents, carers or guardians (referred to in this notice as "parents") and alumnae.
- 2.2 This information is provided in accordance with the rights of individuals under General Data Protection Regulation (GDPR), and all applicable data protection legislation, to understand how their data is used. Staff, parents, pupils and alumnae 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 or paper form.
- 2.4 This Privacy Notice also applies in addition to the school's other relevant terms and conditions and policies, including:
 - (a) any contract between the school and its staff or the parents of pupils;
 - (b) the school's policy on taking, storing and using images of children, entitled Camera Use Policy;
 - (c) the school's Security Policy;
 - (d) the school's Record Keeping Policy;
 - (e) the school's Safeguarding, or Health and Safety policies, including as to how concerns or incidents are recorded;
 - (f) the school's IT policies, including its ICT Acceptable Use policy and Data Protection.
 - (g) Anyone who works for, or acts on behalf of, the school (including staff, volunteers, Council members and service providers) should also be aware of and comply with this Privacy Notice, which also provides further information about how personal data about those individuals will be used.

3 RESPONSIBILITY FOR DATA PROTECTION

- 3.1 Roedean Moira House has appointed a Privacy Officer who will deal with all your requests and enquiries concerning the school's use of your personal data (see section on Your Rights below) and endeavours to ensure that all personal data is processed in compliance with this notice and all applicable Data Protection legislation.
- 3.2 The Privacy Officer is Jane Mole (Database Administrator) who can be contacted by email at: dataprotection@moirahouse.co.uk or by telephone: 01323 644144.

4 WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

- 4.1 In order to carry out its ordinary duties to staff, pupils and parents, the school may process a wide range of personal data about individuals (including current, past and prospective staff, pupils, parents or alumnae) as part of its daily operation.
- 4.2 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 its staff, or parents of its pupils, or where you have given permission for the school to use your personal data as outlined in the contract.
- 4.3 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.
- 4.4 The school expects that the following uses may fall within that category of its (or its community's) "legitimate interests":
- a) For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents);
 - b) To provide education services, including musical education, physical training or spiritual development, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
 - c) Maintaining relationships with alumnae and the school community, including marketing or fundraising activity;
 - d) For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests (please note that the school may carry out credit checks where appropriate);
 - e) For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as diversity or gender pay gap analysis and taxation records);
 - f) To enable relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate;
 - g) To give and receive information and references about alumnae, current and prospective 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;
 - h) 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;
 - i) To safeguard pupils' welfare and provide appropriate pastoral care;

- j) To monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's ICT Acceptable Use Policy;
- k) To make use of photographic images of pupils in school publications, on the school website and (where appropriate) on the school's social media channels in accordance with the school's Camera Use Policy;
- l) For security purposes, including CCTV in accordance with the school's Security Policy;
- m) To carry out or cooperate with any school or external complaints, disciplinary or investigation process; and
- n) Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

4.5 If you are a member of the Roedean Moira House Community Network, we will only use your information to provide you with details of news, products and services, which we identify as being relevant to you from your association with Roedean Moira House. We will communicate this information to you via postal mail, and electronic means (email and/or SMS), provided that you have not opted out of any of these forms of communication. Should you later wish to opt out of receiving these communications, then you may do so by following the "unsubscribe" function where available, or otherwise emailing or writing to us using our contact information provided later in this Privacy Policy.

4.6 In addition, the school may 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 may include:

- (a) 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 where it is in the individual's interests to do so: for example for medical advice, social services, insurance purposes or to organisers of school trips;
- (b) To provide educational services in the context of any special educational needs of a pupil;
- (c) To provide spiritual education in the context of any religious beliefs;
- (d) In connection with employment of its staff, for example DBS checks, welfare or pension plans;
- (e) To run any of its systems that operate on biometric data, such as for security, registration, access control and other forms of pupil identification (lockers, lunch etc.); or
- (f) As part of any school or external complaints, disciplinary or investigation process that involves such data, for example; if there are SEN, health or safeguarding elements; or
- (g) For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

5 TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

This will include by way of example:

- 5.1 Names, addresses, telephone numbers, email addresses and other contact details;
- 5.2 Car details (about those who use our car parking facilities);
- 5.3 Bank details and other financial information, e.g. about parents who pay fees to the school;
- 5.4 Past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- 5.5 Personnel files, including in connection with academics, employment or safeguarding;
- 5.6 Where appropriate, information about individuals' health, and contact details for their next of kin;
- 5.7 References given or received by the school about pupils, and information provided by previous educational establishments and/or other professionals or organisations working with pupils; and
- 5.8 Correspondence with and concerning staff, pupils and parents past and present; and
- 5.9 Images of pupils (and occasionally other individuals) engaging in school activities, and images captured by the school's CCTV system (in accordance with the school's Camera Use Policy).

6 HOW THE SCHOOL COLLECTS DATA

- 6.1 Generally, the school receives personal data from the 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 or communication (such as email or written assessments).
- 6.2 The school may also collect information about your usage of our website(s) to improve our services available to you. This may include technical information including the IP (Internet Protocol) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform and if you access our site by your mobile device, we may collect your unique phone identifier.
- 6.3 The school collects data through its Roedean Moira House Mail (Moho Mail). You may give us information about you by filling in forms or completing editable fields on our the Moho Mail website. The information you give us may include your name, address, e-mail address, phone number, photograph, and/or such other information as you may give us from time to time.
- 6.4 However, in some cases personal data may be supplied by third parties (for example another school, or other professionals or authorities working with that individual); or collected from a third party or publicly available resources (for example, if you post something on the Roedean Moira House School Facebook page, Twitter or if we find out about one of your achievements through a story in the local newspaper, or if someone else tells us). Please see further below (Keeping in Touch and Supporting the School) for the ways the school may do this.

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

- 7.1 Occasionally, the school will need to share personal information relating to its community with third parties, such as:
 - (a) professional advisers (lawyers and accountants) or relevant authorities (HMRC, police or the local authority).

- (b) government authorities (e.g. HMRC, DfE, police or the local authority); and
- (c) appropriate regulatory bodies (e.g. the [Independent Schools Inspectorate](#), the [Charity Commission](#) or the [Information Commissioner](#)).

7.2 The school works in close conjunction with the Old Girls' Association, which is independent from the School. If you are a member of the Old Girls' Association or a former pupil or member of staff, we may share your personal data with other selective Old Girls and selective Roedean Moira House employees and consultants in order to seek to achieve the aims of the Old Girls' Association - which include organising reunions and supporting Roedean Moira House. Please see the Old Girls' Association pages for more details.

7.3 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:

- (a) medical records (held and accessed only by the lead nurse and appropriate medical staff under his/her supervision, or otherwise in accordance with express consent); and
- (b) pastoral files;
- (c) safeguarding files held by the DSL.

7.4 However, a certain amount of any SEN 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.

7.5 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 may include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as Social Services, the LADO or police. For further information about this, please view the school's [Safeguarding Policy](#).

7.6 Finally, in accordance with Data Protection Law, some of the school's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the school's specific directions and we take all appropriate measures to prevent unauthorised or unlawful access to it. As many of these processors operate globally, it may be necessary to transfer your information internationally. Use of personal data by such third parties is safeguarded by both international procedures and legal agreements to comply with the requirements of the Act.

8 HOW LONG WE KEEP PERSONAL DATA

8.1 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; this will be in accordance with school's Record Keeping Policy. 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 need to be kept much longer, in accordance with specific legal requirements. If you have any specific queries about how this notice is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact Jane Mole, Privacy Officer (Database Administrator). However, please bear in mind that the school may have lawful and necessary reasons to hold on to some data even following such request.

- 8.2 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 the fact in order to fulfil your wishes (called a "suppression record").
- 8.3 Roedean Moira House has a Record Keeping Policy which specifies how long we will keep different types of data.

9 KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

- 9.1 The school and (in accordance with your preferences) any relevant other organisation named below, notably alumnae, will use the contact details of parents, alumnae and other members of the school community to keep them updated about the activities of the school, or alumnae and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the school may also:
- (a) Share personal data about parents and/or Alumnae, as appropriate, with organisations set up to help establish and maintain relationships with the school community, such as the Roedean Moira House Alumnae and Old Girls' Association and Roedean Moira House Association (RMHA);
 - (b) Contact parents and/or alumnae (including via the organisations above) by post and email in order to promote and raise funds for the school;
 - (c) Collect information from publicly available sources about parents' and alumnae occupations and activities, in order to maximise the school's fundraising potential: this includes social media (e.g. LinkedIn, Facebook), websites (including news media sites, [Companies House](#) etc.) and publications (e.g. national/local newspapers or magazines and trade press).
- 9.2 Should you wish to limit or object to any such use, or would like further information about them, please contact Jane Mole, Privacy Officer (Database Administrator) in writing. You always have the right to withdraw consent, where given, or otherwise object to marketing or fundraising. However, the school may need nonetheless to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

10 YOUR RIGHTS

- 10.1 Rights of access, etc.
- a) Individuals have various rights under Data Protection Law to access and understand personal data about them held by the school, and in some cases ask for it to be erased or amended or for the school to stop processing it, but subject to certain exemptions and limitations.
 - b) Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, should put their request in writing to Jane Mole, Privacy Officer (Database Administrator)
 - c) Subject to the satisfaction of suitable identity checks, 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 one month in the case of requests for access to information. The school will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, the school may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows it.
- 10.2 Requests that cannot be fulfilled

- (a) You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal professional privilege.
- (b) The school is also not required to disclose any pupil examination scripts (or other information consisting solely of pupil test answers), provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the school itself for the purposes of the education, training or employment of any individual.
- (c) You may have heard of the "right to be forgotten". However, we 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 legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

10.3 Pupil requests

- (a) 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.
- (b) Indeed, while a person with parental responsibility will generally be expected to make a subject access request on behalf of younger pupils, the information in question is always considered to be the child's at law. A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf, and moreover (if of sufficient age) their consent or authority may need to be sought by the parent. Pupils aged 13 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. Children younger than 13 may be sufficiently mature to have a say in this decision. All subject access requests from pupils will therefore be considered on a case by case basis.

10.4 Parental requests, etc.

- a) Parents will in general receive educational and pastoral updates about their children, (in accordance with the Parent Contract). 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.
- b) All information requests from, on behalf of, or concerning pupils – whether made under a subject access or simply as an incidental request – will therefore be considered on a case by case basis.

10.5 Consent

- (a) Where the school is relying on consent 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 have another lawful reason to process the personal data in question even without your consent.
- (b) 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. an employment or parent contract, or because a purchase of goods, services or membership of an organisation has been requested).

11 WHOSE RIGHTS?

- 11.1 The rights under Data Protection Law belong to the individual to whom the data relates. However, the school will often rely on parental consent to process personal data relating to pupils (if consent is required) unless, given the nature of the processing in question, and the pupil's age and understanding, it is more appropriate to rely on the pupil's consent.
- 11.2 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.
- 11.3 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, unless, in the school's opinion, there is a good reason to do otherwise.
- 11.4 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.
- 11.5 Pupils are required to respect the personal data and privacy of others, and to comply with the school's ICT Acceptable Use Policy and the school rules. Staff are under professional duties to do the same, as covered under the Data Protection and ICT Acceptable Use Policy.

12 DATA ACCURACY AND SECURITY

- 12.1 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 appropriate contact in school of any changes to information held about them (Alumnae via Sue Graham, Alumnae and Head of Communications, other school community members via School Office).
- 12.2 An individual has the right to request that any inaccurate or out-of-date information about them is erased or corrected (subject to certain exemptions and limitations under Act): please see above for details of why the school may need to process your data and who you may contact if you disagree.
- 12.3 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 members of Council are aware of this notice and their duties under Data Protection Law.

13 COOKIES

- 13.1 A cookie is a string of information that is sent by a website and stored on your hard drive or temporarily in your computer's memory. We may employ cookie technology to help you move faster through our Site and to assist with the online application process. We may employ cookie technology to estimate our total audience size and traffic and to help us improve our Site's experience by measuring which site areas are of greatest interest to users.
- 13.2 You can turn off the ability to receive any of these cookies by adjusting the browser in your computer, but you should note that if you do so, this may materially affect the functionality of the

Site and the information you can access through it. If you wish to find out more about cookies, or how to refuse cookies, please visit the Interactive Advertising Bureau's website at www.allaboutcookies.org.

13.3 Further information is also available on the Information Commissioners website:

13.4 <https://ico.org.uk/for-organisations/guide-to-pecr/cookies-and-similar-technologies/>

13.5 The following Cookies are used on our school website:

ASP.NETSessionId

A cookie for session control. This cookie is only used to establish connections between the client and the server, so no private data is held. This cookie is called "ASP.NETSessionId". The cookie is removed as soon as you close your browser.

Style

A cookie for remembering accessibility options (i.e. the Standard View and High Visibility links at the bottom of each page). The cookie is removed after 24 hours.

_atuvc"

A cookie to update the "share count" on the Add This function (see the Bookmark and Share icon at the top of the website). The cookie is removed after 48 hours.

14 THIS PRIVACY NOTICE

14.1 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.

15 QUERIES AND COMPLAINTS

15.1 Any comments or queries on this notice should be directed to Jane Mole, Privacy Officer (Database Administrator) by email at: dataprotection@moirahouse.co.uk or by telephone: +44 (0)1323 644144

15.2 If an individual believes that the school has not complied with this notice or acted otherwise than in accordance with Data Protection Law, they should utilise the school complaints procedure and should also notify the Privacy Officer. 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.