



BROOKE HOUSE COLLEGE ENGLAND

Data Privacy Notice

1. INTRODUCTION

Brooke House College takes our responsibilities as a data controller seriously and are committed to using the personal data we hold in accordance with the law. Individuals must opt-in whenever data is collected and the opt-in must be active and not assumed. Please therefore complete the relevant Consent Form(s) that match the description of your association with the College and that of your child, if they are aged 12 years, once you have read this information. Students aged 13+ will complete their own consent form. This privacy notice provides detailed information about how we process personal data. It emphasises the need for transparency over how we use your personal data and your right to be informed. Individuals have the right to confirmation that their data is being processed and access to the personal data being processed. Individuals also have a right to object and withdraw from data being processed. Please read this notice carefully and if you have questions regarding your personal data or its use, or if you have any queries before you opt-in, or wish to withdraw your consent, please contact the College directly by emailing m.black@brookehouse.com or telephone 01858 462452; or, by post GDPR Controller, Brooke House College, 12 Leicester Road, Market Harborough, LE16 7AU.

2. TYPES OF PERSONAL DATA WE PROCESS

We process personal data about prospective, current and past students and their parents, agents and student representatives; staff, suppliers and contractors; sponsors, friends and supporters; and other individuals connected to or visiting the College.

The personal data we process takes different forms – it may be factual information, expressions of opinion, images or other recorded information which identifies or relates to a living individual.

Examples include:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- family details;
- admissions, academic, disciplinary and other education related records, information about special educational needs, references, examination scripts and marks;
- education, recruitment and employment data;
- images, audio and video recordings;
- financial information
- CPD courses, meetings or training events attended.

As a College, we need to process special category personal data, eg: concerning health, ethnicity, religion and criminal records information about some individuals. We do so in accordance with applicable law, including with respect to safeguarding or employment or by explicit consent.

3. COLLECTING, HANDLING AND SHARING PERSONAL DATA

We collect most of the personal data we process directly from either the individual concerned, or from students' parents, guardians or representatives. In some cases, we collect data from third

parties, including referees for employment, previous schools attended by students, the Disclosure and Barring Service, or professionals or authorities working with the individual, or from publicly available resources.

Personal data held by us is processed by appropriate members of staff for the purposes for which the data was provided. We 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 college systems. Where we transfer personal data outside of the European Economic Area, we have confirmed GDPR compliance, with adequate protection for the rights of data subjects. In the course of college business, we share personal data where appropriate with third parties such as the local doctors, dentist, opticians, the college's professional advisors and relevant authorities (eg; Leicestershire County Council, DBS, NCTL, UK Visas and Immigration, HMRC, Now Pensions, Department for Education and Department for Work and Pensions). Some of our systems are provided by third parties, eg hosted MIS database (Engage), school website, school portal, or cloud storage providers (Dropbox). This is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions and the GDPR.

We do not share or sell personal data to other organisations for their own purposes. We do not use any automated decision making tools for individual profiling to process any data.

4. PURPOSES FOR WHICH WE PROCESS PERSONAL DATA

We process personal data to support the College's operation as an independent boarding school for boys and girls aged 12 upwards, and in particular for:

- The admission of students;
- The provision of education to students including the administration of the school curriculum and timetable; monitoring student progress and educational needs; reporting on the same internally and to parents; administration of students' entries to public examinations, reporting upon and publishing the results; providing references for students (including after a student has left);
- The provision of educational support and related services to students (and parents) including the maintenance of discipline; provision of careers services; administration of sports fixtures and teams, school trips; provision of the school's IT and communications system, all in accordance with our IT policies;
- The safeguarding of students' welfare and provision of pastoral care, welfare, health care and in boarding houses;
- The research into and development of effective teaching and learning methods
- Compliance with legislation and regulation set by the Home Office for Tier 4 Visa issuance, including the preparation of information for inspection by the Independent Schools Inspectorate, submission of annual census information to the Independent Schools Council and Department for Education;
- Operational management including the compilation of student records; the administration of invoices, fees and accounts; the management of the College's property; the management of security and safety arrangements, including the monitoring of the school's IT and communications systems in accordance with our Acceptable Use Policy; management planning and forecasting; research and statistical analysis; the administration and implementation of the College's rules and policies for students and staff; the maintenance of historic archives and other operational purposes;
- Staff administration including the recruitment of staff/ engagement of contractors (including compliance with DBS procedures); administration of payroll, pensions and sick leave; review and appraisal of staff performance; conduct of any grievance, capability or disciplinary procedures; and the maintenance of appropriate human resources records for current and former staff; and providing references;

- The promotion of the College through its own websites, the prospectus and other publications and communications, including through our social media channels;
- Maintaining relationships with the wider school community by communicating with the body of current and former student and/or their parents or guardians and organising events. The processing set out above is carried out to fulfil our legal obligations, including those under our terms and conditions for parents and staff employment contracts.

5. HOW LONG WE KEEP PERSONAL DATA

We retain personal data only for a legitimate and lawful reason and only for so long as necessary or required by law. We have adopted Records Retention Guidelines from the Information & Records Management Society for Schools, which set out the time period for which different categories of data are kept. If you have any specific queries about our record retention periods, or wish to request that your personal data is considered for erasure, please contact m.black@brookehouse.com.

6. YOUR RIGHTS

You have various rights under Data Protection Law to access and understand the personal data we hold about you, and in some cases to ask for it to be erased or amended or for us to stop processing it, but subject to certain exemptions and limitations.

You always have the right to withdraw consent, where given, or otherwise object to receiving generic communications. Please be aware however that the school may have another lawful reason to process the personal data in question even without your consent. That reason will usually have been asserted under this Privacy Notice, or may exist under some form of contract or agreement with the individual, e.g. an employment contract or under the Terms and Conditions for Parents, or because of a purchase of goods or services. If you would like to access or amend your personal data, or would like it to be transferred to another person or organisation, or have some other objection to how your personal data is used, please make your request in writing to m.black@brookehouse.com. We will 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. We will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, we may ask you to reconsider or charge a proportionate fee but only where Data Protection Law allows it.

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 privilege. We are also not required to disclose any student examination scripts (though examiners' comments may fall to be disclosed), nor any confidential reference given by the school for the purposes of the education, training or employment of any individual.

7. STUDENT DATA

The rights under Data Protection legislation belong to the individual to whom the data relates. However, we will often rely on parental consent to process personal data relating to student (if consent is required) unless, given the nature of the processing in question, and the student's age and understanding, it is more appropriate to rely on the student'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. In general, we will assume that student's 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 student's activities, progress and behaviour, and in the interests of the student's welfare, unless, in the school's opinion, there is a good reason to do otherwise.

However, where a student seeks to raise concerns confidentially with a member of staff and expressly

withholds their agreement to their personal data being disclosed to their parents, we may be under an obligation to maintain confidentiality unless, in our opinion, there is a good reason to do otherwise; for example where the school believes disclosure will be in the best interests of the student or other students, or is required by law.

Students can make subject access requests for their own personal data, provided that they have sufficient maturity (age 13+) to understand the request they are making.

A person with parental responsibility will generally be entitled to make a subject access request. A student of any age may ask a parent or other representative to make a subject access request on their behalf. Moreover (if of sufficient maturity) their consent or authority may need to be sought by the parent making such a request.

8. CHANGE OF DETAILS

We try to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Please notify m.black@brookehouse.com of any significant changes to important information, such as contact details, held about you.

9. THIS POLICY

Our privacy notice should be read in conjunction with our other policies and terms and conditions which make reference to personal data, including our Safeguarding Policy, Health & Safety Policies and the Acceptable Use of IT Policy.

We will update this Privacy Notice from time to time. Any substantial changes that affect how we process your personal data will be notified on our website and to you directly, as far as practicable. If you believe that we have not complied with this policy or have acted otherwise than in accordance with Data Protection Law, you should notify m.black@brookehouse.com. 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 us before involving them. Their contact details are:-

Telephone. 0303 123 1113. Or <https://ico.org.uk/concerns/>

Authorised by resolution of the Board of Directors

Date 21-05-18

Effective date of the policy 25-05-18

Schedule of Updates

Date document updated	Document updated by	Summary update/comments	Location of saved file

Schedule of Review

Date of document review	Reviewed by	Scheduled date of next review
July 2018	MCO	July 2019