

PRIVACY NOTICE

1 Introduction

This is the School's Privacy Notice, with particular relevance to parents of children at the School and other members of the public who may provide us with personal information on occasions. Please note that we also have the following specific Privacy Notices:

- *Privacy Notice for Students*
- *Privacy Notice for Staff*
- *Privacy Notice for Alumni*

This notice is to tell you how we use the personal information or personal data we collect about you (and your child/ren if you are a parent of the School) and what we do with that information.

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 the parents of students
- the School's policy on taking, storing and using images of children
- the School's *Surveillance Camera System Procedure*
- the School's *Data & Records Retention Policy*
- the School's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded
- the School's policies relating to the use of technology

Students may operate their own personal data rights although their capacity to do so should be assessed individually, considering the child's maturity, understanding, the information involved and consequences. Parents may therefore also wish to view our Privacy Notice for Students.

2 Who we are

For the purposes of UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025, the School is the Data Controller. The School does not have a statutory requirement to appoint a Data Protection Officer. Responsibility for overseeing compliance with data protection legislation has been delegated to the School's Data Protection Lead.

The postal address of the School is:

New Hall School, The Avenue, Boreham, Chelmsford, Essex CM3 3HS

In this Privacy Notice, 'we' and 'us' means the School.

If you would like to contact us about your personal information you can contact our Data Protection Lead:

Mr Vincent Holden, Vice Principal

New Hall School, The Avenue, Boreham, Chelmsford, Essex CM3 3HS

Email: v.holden@newhallschool.co.uk

3 What information we collect and hold

The categories of student information that we process include:

- personal identifiers and contacts (such as name, contact details and address)
- identity documents e.g. passport
- characteristics (such as ethnicity, language and country of birth)
- safeguarding information (such as court orders and professional involvement)
- special educational needs
- medical and administration (such as doctors' information, child health, dental health, allergies, medication and dietary requirements and medical treatment records) held and accessed by the Health & Wellbeing Centre staff and by any teaching and pastoral or resident staff that need to be aware
- admissions and attendance (such as sessions attended, number of absences, absence reasons, any previous schools attended and where they go when they leave New Hall);
- assessment and attainment (including academic records and examination scripts and marks)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- images of students engaging in school activities (including for the purpose of their education and/or sport performance)
- images captured by the School's Surveillance Camera system that are used in accordance with the Information Commissioner's Office (ICO) guidance relating to video surveillance and surveillance systems and the School's policy on *Taking, Storing and Using Images of Children*
- information required for authentication as part of the School's security (including the fob operated access system)
- information required for students attending school organised trips

The categories of parent information that we process include:

- personal identifiers and contacts (such as name, contact details and address)
- employment details (such as profession, job title and employment contact details)
- characteristics (such as ethnicity, language and country of birth)
- safeguarding information (such as court orders and professional involvement)
- bank account information for direct debit agreements for payment of school fees
- payment card details, for example if you pay for tickets to a School event e.g. a drama production

The categories of personal information that we process for other visitors may include:

- name and contact details
- accessibility information, for example if you are attending an event and we may need to make reasonable adjustments/provisions

The categories of personal information that we process about educational guardians appointed for overseas students include:

- personal identifiers and contacts (such as name, contact details and address)

4 How we collect personal information

For the majority of personal information, we ask for this directly when students join the School and for students and parents to let us know of any changes while students are with us. We may also ask for additional information during a student's time at New Hall, for example in email communication, written assessments or trip permission. We may also receive information about students from a previous school, local authority and/or the Department for Education (DfE), health professionals, social care, police, examination bodies, public sources and online systems. Information required as part of the School's admissions process for overseas students may be provided by international agents. Pupil data is essential for the Schools' operational use. Provision of some categories of information may be a statutory requirement, contractual requirement, necessary to enter a contract, or voluntary. In order to comply with the UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025, we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this. Visitors may provide personal information when signing in as a visitor to the School or via a booking system, which may be via a third party such as Eventbrite, for event tickets.

5 Why we collect and use this information

We collect and use your information so that we can provide students with their education and to enable us to care for them, including:

- as part of the admissions process to admit students to the School
- to deliver and support students' education and learning, including musical education, physical training, spiritual development, career services, co-curricular activities and to support any additional educational needs
- to monitor and report on student progress
- to provide appropriate pastoral care, to safeguard student welfare and to keep students safe
- to assess the quality of our services
- to enable all our students to take part in national or other assessments, and to publish the results of public examinations or other achievements of students of the School
- to make use of photo and video images in School publications, on the School website and (where appropriate) on the School's social media channels
- to monitor use of our IT and communications systems in accordance with our policies
- for your safety and security purposes, including Surveillance Cameras
- to comply with the statutory duties placed upon us

We also collect and use information for us to operate as a school, including:

- 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, current and prospective students, including relating to outstanding fees or payment history, to/from any educational institution that the student attended or where it is proposed they attend; and to provide references to potential employers of past students
- to secure funding for the School or on behalf of individual students
- for maintenance of historic archive; and
- to comply with the law regarding data sharing

6 The lawful basis on which we use this information

The use of your information for these purposes is lawful for the following reasons:

- we have a legitimate interest in holding and using information because it is necessary in order to provide students with education and pastoral care and connected purposes
- the School's legitimate interests include:
 - operating and administering the School
 - safeguarding pupils
 - maintaining security
 - communicating with parents and former pupils
 - supporting educational outcomes
- where processing is necessary for admissions steps requested by a prospective parent/pupil or for performance of the parent contract.
- the School is under a legal obligation to collect the information or the information is necessary for us to meet legal requirements imposed upon us such as our duty to safeguard students
- it is necessary for us to hold and use your information for the purposes of our functions in providing schooling and so we can look after our students. This is a function which is in the public interest because everybody needs to have an education
- we do not usually need consent to use personal information. Where we do require consent we will contact you, or your child if your child is deemed to be of the age appropriate to provide their own consent

Where the School on occasion needs to process special category personal data including information concerning health, racial or ethnic origin, religious or philosophical beliefs, biometric data used for identification, sex life or sexual orientation, the reasons will include:

- to safeguard students' 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 medical advice, 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 provide educational services in the context of any special educational needs of a student
- 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 and health and safety) and to comply with its legal obligations and duties of care

The School does not make decisions about individuals solely by automated means where those decisions produce legal or similarly significant effects.

7 Storing your data

Different categories of information are retained for different periods depending on legal, safeguarding and operational requirements. The School's *Data & Records Retention Policy* provides lots of information on the records we store and how long for. For a copy of the policy, please contact the School's Data Protection Lead via the details found towards the end of this policy

document.

8 Who we may need to share your information with

For the most part, personal information collected by the School will remain within the School, and will be accessed by staff only on a 'need to know' basis.

Some of our activity is carried out on our behalf by third parties, such as student introduction agencies, IT software systems, web developers, cloud storage providers and mailing services. We will always make sure we have in place agreements with any third parties processing personal data on our behalf, that personal information will be kept securely and only in accordance with our instructions. This may not apply to independent/joint controllers such as DfE, UKVI, police, local authorities, examination boards and healthcare providers.

We may need to share your information with:

- schools that students move to if they leave New Hall and/or higher education institutions they apply to
- the New Hall Parents' Association, for example for leavers' gifts
- our local authority or the local authority a student lives in
- the Department for Education (DfE)
- UK Visas and Immigration
- other bodies for the purpose of a student's education, for example competitions, co-curricular activities (including trips), examination boards and disclosures connected with SEN support
- educational guardians appointed for overseas students
- other bodies that may require us to share information such as police and safeguarding bodies, children's social care, health professionals, emergency services, insurers, professional advisers, auditors, regulators/inspectors, examination bodies, payment providers, trip/transport/catering providers and IT/cloud processors

Information disclosed to some people/services may include sensitive personal information. Usually this means information about health and any special educational needs or disabilities students may have. We do this where it is in the student's or other person's vital interests for their personal information to be passed to other services.

Our disclosure of any sensitive personal data is lawful for the following reasons:

- the School is under a legal obligation to disclose the information or disclosing the information is necessary for us to meet legal requirements imposed upon us such as our duty to look after our students and protect them from harm
- it is necessary for us to disclose information for the purposes of our functions in providing schooling. This is a function which is in the public interest
- we have a legitimate interest in disclosing information because it is necessary in order to provide our students with education and pastoral care and connected purposes as outlined above
- we may not need consent to disclose your information. However, if at any time it appears to us that we would need consent then we will ask before a disclosure is made

We do not normally transfer information to a different country which is outside the United Kingdom. Where this is the case, we will comply with the UK GDPR, Data Protection Act 2018

and Data (Use and Access) Act 2025 by ensuring that appropriate safeguards listed in the UK GDPR have been implemented or one of the exemptions applies. Examples may include cloud-hosted educational and administrative systems used by the School. Where personal information is transferred outside the UK, the School will ensure that an appropriate transfer mechanism has been implemented.

9 Your rights

You have the following rights:

- to obtain access to, and copies of, the personal information that we hold about you
- to require us to correct the personal information we hold about you if it is incorrect
- to require us (in certain circumstances) to erase your personal information
- to request that we restrict our data processing activities
- to withdraw consent at any time without affecting processing lawfully carried out before withdrawal
- to request that we provide you or any third party that you identify with a copy of your personal information in a commonly used, machine readable format
- 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
- right to object to direct marketing, including related profiling

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, currently set at one month. However, we may extend this time limit by up to an additional two months where this is justified because your request is complex or you have submitted multiple requests at one time.

Should you wish to exercise any of your rights in relation to your personal information as set out above, it would be helpful if such requests were made in writing to the School's Data Protection Lead. However, any such requests may be made verbally to any member of School staff.

If a parent wishes to submit a request for access to their child's personal information, we request that the form found at Appendix 1 be completed and sent to the School's Data Protection Lead (contact details below).

Mr Vincent Holden, Vice Principal
New Hall School, The Avenue, Boreham, Chelmsford, Essex CM3 3HS
Email: v.holden@newhallschool.co.uk

10 Data Protection complaints

Individuals have the right to raise a data protection complaint directly with the School. If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance.

Complaints may be made verbally, in writing, by email, or through the School's complaints process. Data Protection complaints can be submitted directly to the Data Protection Lead, or by completing the Data Protection Complaints form.

The School will acknowledge data protection complaints and investigate them in accordance with its Data Protection Complaints Procedure.

If you remain dissatisfied following the School's response, you may contact the Information Commissioner's Office.

<https://ico.org.uk/make-a-complaint>

You can contact the Information Commissioner's Office at or the contact details below:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Tel: 0303 123 1113 (local rate) or 01625 545 745.

11 Contact

If you would like to discuss anything in this *Privacy Notice*, please contact:

Mr Vincent Holden, Vice Principal
New Hall School, The Avenue, Boreham, Chelmsford, Essex CM3 3HS
Email: v.holden@newhallschool.co.uk

PARENT/GUARDIAN ACCESS REQUEST FORM

PARENT/GUARDIAN DATA ACCESS REQUEST FORM

Request for access to a child's personal data

This form is provided to help the School process a request for access to personal data held about a child.

You do not have to use this form. A subject access request can be made verbally or in writing and does not need to use particular wording.

The School will assess each request in accordance with applicable data protection legislation and ICO guidance.

A. CHILD'S DETAILS

Name of child:
Date of birth:
Year group:

B. REQUESTER'S DETAILS

Name of parent/guardian/representative: _____
Relationship to child:
Address:
Telephone number:
Email address:

C. INFORMATION REQUESTED

Please describe the personal data you are requesting. You may request all personal data held about the child or specify particular information, records, dates or subject areas.
If you are seeking particular records or information, please provide any details that may help the School locate them. Relevant dates or period, if known:

D. AUTHORITY TO ACT ON BEHALF OF THE CHILD

Please tick the statement that best describes the basis on which you are making this request: ☐ I have parental responsibility for the child. ☐ I have been authorised by the child to make this request on their behalf. ☐ I am acting on behalf of the child in another capacity and can provide evidence of my authority. Details/evidence of authority, where applicable:
The School may ask for reasonable evidence of identity, parental responsibility or other authority where necessary.

E. CHILD'S INVOLVEMENT

The School will consider whether the child is competent to exercise the right of access themselves. There is no automatic age threshold for competence in England. Where appropriate, the School may discuss the request with the child and/or seek the child's views before deciding whether and to whom information should be disclosed. If the child is competent and has authorised the requester to act on their behalf, the School may ask the child to complete the following section. Child's name:
I understand that my parent/guardian/representative: Name:
has requested access to my personal data held by New Hall School.

I understand that the School may provide my personal data to the person named above in accordance with applicable data protection law.

I authorise the person named above to make this request on my behalf.

Child's signature:

Date:

Where appropriate, the School may independently check that the child's decision has been freely made, is informed and reflects the child's wishes and understanding.

F. DECLARATION BY REQUESTER

I confirm that the information I have provided is accurate to the best of my knowledge.

I understand that the School will assess this request under applicable data protection legislation and may need to verify my identity and/or authority to act on behalf of the child.

I understand that the School may need to withhold or redact information where required or permitted by law, including information concerning other people or information subject to an applicable exemption.

Signature:

Date:

FOR OFFICE USE ONLY
Date request received:
Received by:
Date request referred to Data Protection Lead:
1. IDENTITY CHECK Identity verification should only be requested where reasonably necessary and should be proportionate to the circumstances. ☐ Identity already established / no further check required ☐ Identity check required Method/evidence used to verify identity:
Identity verified by:
Date:
2. AUTHORITY CHECK ☐ Parental responsibility/authority established ☐ Child's authorisation established ☐ Other authority established ☐ Further evidence required Evidence/details:
Checked by:
Date:
3. CHILD COMPETENCE / BEST INTERESTS Where relevant, record the School's assessment of whether the child is competent to exercise the right of access and/or whether disclosure to the requester is in the child's best interests. Competence assessment required: ☐ Yes ☐ No

Outcome:
Relevant considerations may include the child's maturity and understanding, the nature and sensitivity of the information, the child's wishes and feelings, the consequences of disclosure, any concerns about pressure or coercion, and any relevant court orders or duties of confidence.
Best-interests assessment required: ☐ Yes ☐ No
Outcome/reasons:
Assessment completed by:
Date:
4. REQUEST PROCESSING
Scope of request:
Clarification required: ☐ Yes ☐ No
Date clarification requested:
Date clarification received:
Response deadline:
Extension required: ☐ Yes ☐ No If yes, date requester informed:
5. SEARCH AND REVIEW
Reasonable and proportionate searches completed: ☐ Yes ☐ No

Relevant systems/records searched:

Third-party information identified: ☐ Yes ☐ No

Third-party information reviewed/redacted where necessary: ☐ Yes ☐ No ☐ N/A

Exemption/restriction considered: ☐ Yes ☐ No

Details, where applicable:

6. RESPONSE

Date response provided:

Method of disclosure:

- ☐ Secure email
- ☐ Secure electronic portal
- ☐ Hard copy
- ☐ Other: _____

Information provided in an accessible and intelligible form:

☐ Yes ☐ No

Secure disclosure arrangements confirmed:

☐ Yes ☐ No

7. REFUSAL / PARTIAL REFUSAL

- ☐ Full disclosure
- ☐ Partial disclosure
- ☐ Refusal

If information has been withheld, record the applicable exemption/restriction and the reasons for the decision.

Where applicable, the response has informed the requester of:

- ☐ the reasons for the decision;
- ☐ their right to complain to the School;
- ☐ their right to complain to the ICO; and
- ☐ their ability to seek to enforce their rights through the courts.

8. FINAL SIGN-OFF

Data Protection Lead / authorised reviewer:

Signature:

Date:

Any further action required: