



HAMPTON SCHOOL TRUST

Privacy Notice

1. This Policy

- 1.1 This policy is intended to provide information about how Hampton School Trust (the “School”) will process personal data about individuals including current, past and prospective pupils and their parents (“parents” means parents, carers and guardians in this policy).
- 1.2 The School is a Data Controller for the purposes of data protection law.
- 1.3 It applies in addition to the School's Terms and Conditions, Contracts, Privacy Notices and any other information the School may provide about a particular use of personal data (e.g. the School's CCTV Policy).
- 1.4 Anyone who works for, or acts on behalf of, the School (including Governors, staff and volunteers and service providers) should also be aware of and comply with this Policy. This Policy also provides further information about how personal data about those individuals will be used. This Policy covers all forms of data processed by the School, including both paper and electronic data.

2. Responsibility for Data Protection

- 2.1 The School Bursar is the senior person with responsibility for data protection matters within the School and is the point of contact for the Information Commissioner’s Office (ICO).
- 2.2 The School’s data protection responsibilities will be delegated to staff members within the School who have the best knowledge to handle or respond to a given matter.

3. How the School collects data

- 3.1 Generally, the School receives personal data from the individual directly or 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, telephone, in person or written assessments). This will include personal data provided in the course of applications to the School by prospective staff or parents.
- 3.2 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 publicly available resources (such as LinkedIn); or simply generated in the course of ordinary school business by teachers or colleagues of the person in question.

4. Types of Personal Data Processed by the School

- 4.1 Generally speaking, the School receives personal data directly from the individual or, in the case of pupils, from parents. On some occasions personal data may be supplied by third parties (for example, another school, other professionals or authorities working with that individual), or be collected from publicly available resources.
- 4.2 The School may, from time to time, need to process special category (sensitive) personal data regarding individuals. Special category personal data includes information about an

Date updated	September 2019	Date ratified by Governors	October 2019
Date of next review	As required	Reason for review	As required

individual's health, race or ethnic origin, religious beliefs, sexual orientation, biometric data, and criminal records and proceedings. Special category personal data is given additional protection under the law, and will only be processed by the School with the consent of the appropriate individual, or as otherwise permitted by data protection law.

- 4.3 See further in Appendix 1 (parents and wider school community) and Appendix 2 (pupils) for further details on personal data used by the School.

5. Use of Personal Data by the School

- 5.1 The School will retain personal data securely and only as long as it is necessary to retain for a legitimate and lawful reason.
- 5.2 The School manages and retains records in accordance with its Records Management Policy. This can be found on the School's website under the 'About us' section.
- 5.3 Occasionally, the School will need to share the personal data it holds relating to its community with third parties, such as professional advisers (lawyers and accountants) or relevant authorities (HMRC, the Police or the local authority); or with affiliated organisations set up to help establish and maintain relationships with the School community, as set out further below.
- 5.4 The School will use (and where appropriate share with third parties) personal data about individuals for a number of purposes as part of its operations.
- 5.5 The School will inform individuals how their data is being used through either this Privacy Notice or other relevant notices that may be contained in a form, contract, policy or request for consent.
- 5.6 The School may not inform an individual about the use of their data when the School shares or processes the information of individuals under a legal obligation.
- 5.7 See further in Appendix 1 (parents and wider school community) and Appendix 2 (pupils) for further details on how and why we use your personal data.

6. Keeping in Touch and Supporting the School

- 6.1 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. This will include sending updates and newsletters by email and by post.
- 6.2 The School may also share personal data about parents, staff and/or alumni, as appropriate, with partner organisations set up to help establish and maintain relationships with the School community including (not exclusively) the Hampton School Parents' Association (HSPA), Hampton Holles Boat Club Association (HHBCA), Hampton School Music Society (HSMS), The Fitzwygram Foundation (FF) and the Old Hamptonians' Association (OHA).
- 6.3 The School also collects information from publicly available sources about parents' and former pupils' occupations and activities, for example, via LinkedIn.
- 6.4 Anyone wishing to limit or object to any such use, or seeking further information, should contact data@hamptonschool.org.uk (the "data email address").

7. Individuals' Rights

- 7.1 Under data protection law individuals have the following rights:
- ✓ to understand what personal data is used by the School;
 - ✓ to require that the School does not send marketing communications;
 - ✓ to request that the School erases personal data;
 - ✓ to require that the School restricts its data processing activities;

- ✓ to receive from the School, in a reasonable format which has been specified by an individual, the personal data which has been provided and which is held by the School (including for the purpose of transmitting that personal data to another data controller;
- ✓ to require that the School updates any personal data which it may hold and which is incorrect.

7.2 The above rights are not absolute, and the School may be entitled to refuse requests where exceptions apply. Please see the School's Data Subject Rights policy for further details of how the school manages such requests.

8. Whose Rights?

8.1 The rights under data protection law belong to the individual to whom the data relates. In a data protection context (as distinct from issues of care and education which may be linked to parental consent or agreement by contract), questions of consent are likely to be for the pupil to exercise from secondary school age – depending on the nature of the processing in question, and the pupil's maturity and understanding. Parents should be aware that in such situations they may not need to be consulted, and in some contexts the child's views may take precedence over the parents'.

8.2 However, both parents and pupils must be aware that – as a general rule – the School may not need to rely on their consent to process their personal data. Most ordinary activities of the School involving pupil and parent personal data will be necessary, either to fulfil the Parents' Contract or in connection with the School's legitimate interests. Other activities, including those relating to SEN and Safeguarding, may be necessary in connection with legal obligations placed on the School.

8.3 In many contexts, the School will not require a pupil's consent to disclose 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. However:

- ✓ where a subject access request as above is made on a pupil's behalf, the School is required to ensure it is made with the child's authority (if the child is old enough to give it) – please see our Data Subject Rights Policy; and
- ✓ 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 will seek to maintain confidentiality unless, in the School's opinion, there is a good reason to do otherwise (e.g. where the School believes disclosure will be in the best interests of the pupil or other pupils).

8.4 Pupils, like the School's staff, are required to respect the personal data and privacy of others and to comply with the School's policies.

9. Data Accuracy and Security

9.1 The School will endeavour to ensure that all personal data held in relation to an individual is as up-to-date and as accurate as possible. Individuals are responsible for notifying the School of any changes to personal information held about them.

9.2 An individual has the right to request that inaccurate personal information is erased or corrected (subject to certain exemptions and limitations under data protection law) and may do so by contacting the School in writing.

9.3 The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals. All members of staff will be made aware of this Privacy Notice, all policies applicable to data protection and IT use, and their duties under the law.

- 9.4 In line with the Records Management Policy and Schedule, the School will take appropriate steps to destroy or erase any data which is no longer required.
- 9.5 All staff are required to use encrypted portable media when transporting School-controlled electronic data. Staff are able to request such media via the IT Services department.
- 9.6 Staff are required to comply with the School's Password Policy (minimum of eight characters, containing three of the following: uppercase character, lowercase character, at least one character that is not alphanumeric).
- 9.7 A process is in place to ensure that any suspected or actual loss of information is handled without undue delay and in line with ICO guidance and data protection law. Anybody who suspects that personal information has been misplaced, must report this immediately following the School's Data Incident and Breach Process.

10. Queries and Complaints

- 10.1 Any comments or queries on this policy should be directed to the School using the following contact details:
 - The Bursar
 - Hampton School
 - Hanworth Road
 - Hampton
 - Middlesex
 - TW12 3HDOr data@hamptonschool.org.uk
- 10.2 If an individual believes that the School has not complied with this Policy or has acted otherwise than in accordance with data protection law, they should utilise the School Complaints Procedure (which can be found the School's website).
- 10.3 If an individual is not satisfied with a response to a complaint under 9.2 above, they may contact the ICO. Information can be found at <https://ico.org.uk/> or by calling 0303 123 1113.

Appendix 1: Parents and wider 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);
- ✓ biometric information, which will be collected and used by the School in accordance with the School's Biometrics Policy;
- ✓ bank details and other financial information, e.g. about parents who pay fees to the School;
- ✓ past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- ✓ where appropriate, information about individuals' health, and contact details for their next of kin;
- ✓ 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;
- ✓ 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 CCTV Policy); and
- ✓ medical information recorded by the School's medical staff, by way of medical form for school trips or admission data.

Why the School needs to process personal data

The School expects that the following uses may fall within that category of its (or its community's, meaning pupils, parents and alumni) "**legitimate interests**":

- ✓ for the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents);
- ✓ 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;
- ✓ maintaining relationships with alumni and the School community, including direct marketing or fundraising activity;
- ✓ 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 (such as diversity or gender pay gap analysis and taxation records);
- ✓ where appropriate, information about individuals' health, and contact details for their next of kin;
- ✓ 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 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' welfare and provide appropriate pastoral care;
- ✓ to monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's IT policies;
- ✓ 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;
- ✓ for security purposes, including CCTV in accordance with the School's CCTV policy;
- ✓ where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School.

In addition, the School may need to process **Special Category Personal Data** (concerning health, ethnicity, religion, biometrics or sexual life) in accordance with rights or duties imposed on it by law, including, from time to time, by explicit consent where required. These reasons may include:

- ✓ to safeguard a pupil's 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;
- ✓ to provide educational services in the context of any special educational needs of a pupil;
- ✓ to run any of its systems that operate on biometric data, such as for security and other forms of pupil identification (lockers, lunch etc.); 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.

Pupil requests for their data

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). Indeed, while a person with parental responsibility will generally be entitled 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 their behalf. Moreover (if of sufficient age) their consent or authority may need to be sought by the parent making such a request. Pupils of secondary school age will be 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. Younger children may however be sufficiently mature to have a say in this decision.

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

Appendix 2: Pupils

The categories of your information that we collect, hold and share include:

- ✓ Personal information (such as name, unique pupil number and address);
- ✓ Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility);
- ✓ Attendance information (such as sessions attended, number of absences and absence reasons);
- ✓ Assessment information;
- ✓ Medical information;
- ✓ Special educational needs information;
- ✓ Exclusions / behavioural information.

Why we collect and use this information

We use your data to:

- ✓ support your learning;
- ✓ monitor and report on your progress;
- ✓ provide appropriate pastoral care;
- ✓ provide medical treatment and immunisations;
- ✓ assess the quality of our services;
- ✓ comply with the law regarding data sharing.

The lawful basis on which we use this information

We collect and use your information under data protection law for the “legitimate interests” of running the School, meaning it is a reasonable or obvious use of your data for a proper purpose.

The School may need to process what is called Special Category Personal Data (this is more sensitive personal data, for example concerning your health). In some cases, the School may ask for your consent to do so or in other cases your parents will be asked, depending on the legal position.

Collecting your information

Whilst the majority the information you provide to the School is mandatory, some of it is provided on a voluntary basis. In order to comply with data protection law, the School will inform you whether you are required to provide certain information to us or if you have a choice in this.

Storing your data

The School holds pupil data for different lengths of time, depending on the purpose of the data. The time that information is kept for can be found in Appendix 1 to the Records Management Policy which is on the School’s website.

Who we share your information with

The School routinely shares pupil information with:

- ✓ schools that the you attend after leaving Hampton or Hampton Pre-Prep & Prep;
- ✓ the local authority;
- ✓ the Department for Education (DfE);
- ✓ the School’s medical staff.

Why we share your information

The School will not share information about you with anyone without consent or unless the law and the School policies permit it to do so.

The School may share information about you with your parents unless there are legal reasons not to. You can ask that the School does not share some information with your parents. The School cannot promise this because it has a contract with your parents, are legally required to update them on some matters, and it may not be in your best interests.

The School shares pupils' data with the Department for Education (DfE) because it is required to by law. When you leave the School, you will be given information as to how this data is shared with other organisations affiliated to the School.

Data collection requirements

Further information regarding DfE requirements regarding data collection, please go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

Requesting access to or correction of your personal data

If you would like to request access to your personal data, or wish to ask for it to be changed or removed (which the School cannot promise), please go to the School's website and look at the Data Subject Rights Policy.

If you have a concern about the way the School is collecting or using your personal data, we request that you raise your concern with the School in the first instance (data@hamptonschool.org.uk). Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Contact

If you would like to discuss anything in this privacy notice, please contact:

The Bursar
Hampton School
Hanworth Road
Hampton
Middlesex
TW12 3HD

Or email data@hamptonschool.org.uk

Appendix 3: Staff and Job Applicants

This Appendix applies to all staff, contractors, casual workers, temporary staff and volunteers who may be employed or engaged by the School to work for it in any capacity, as well as prospective applicants for roles. It also applies to Governors and trustees. However, no reference to "staff" or "employment" in this notice should be taken to imply or confer any relationship of employment where it does not exist.

This Appendix applies in addition to the School's other relevant terms and conditions and policies, including:

- ✓ any contract between the School and its staff, such as the Terms and Conditions of employment, and the Staff Handbook;
- ✓ the School's CCTV and Biometrics policy;
- ✓ the School's Records Management Policy and Retention Schedule;
- ✓ the School's Safeguarding, Anti-Bullying, and Health and Safety policies, including as to how concerns or incidents are reported or recorded (both by and about staff); and
- ✓ the School's IT policies, including its Acceptable Use Policy.

The Staff Contract, including any document or policy that relates to contractual obligations, may in particular be relevant to and supplement the information in this Appendix in that it will contain details of obligations or rights of the School which may require the use of your personal data. However, this Appendix and the Privacy Notice is the primary document applicable to the use of your personal data by the School.

This Appendix also applies alongside any other information the School may provide about particular uses of personal data, for example when collecting data via an online or paper form.

How we collect your information

There are a number of ways in which the School may collect personal data including, but not exclusively:

- ✓ when you submit a formal application to work for us, and provide your personal data in application forms and covering letters, etc.;
- ✓ information provided during a job assessment process, for example when you come for an interview;
- ✓ information from third parties, for example the Disclosure and Barring Service (DBS) and referees (including your previous or current employers or school), in order to verify details about you and/or your application to work for us.

More generally, during the course of your employment with the School, as a member of staff, the School will collect data from or about you, including:

- ✓ when you provide or update your contact details;
- ✓ when you or another member of staff completes paperwork regarding your performance appraisals;
- ✓ in the course of fulfilling your employment (or equivalent) duties more generally, including by filling reports, note taking, or sending emails on school systems;
- ✓ in various other ways as you interact with us during your time as a member of staff, and afterwards, where relevant, for the various purposes set out below.

The types of information we collect

The School collects various types of personal data including, but not exclusively:

- ✓ contact and communications information, including:
 - contact details (including email address(es), telephone numbers and postal address(es);
 - contact details (through various means, as above) of family members and 'next of kin', (information should be given with the authority of those concerned and in accordance with the School's Privacy Notice);
 - records of communications and interactions;
- ✓ biographical, educational and social information, including:
 - name, title, gender, nationality and date of birth;
 - image and likeness, including as captured in photographs taken for work purposes;
 - educational history and references from institutions of study;
 - lifestyle information and social circumstances;
 - interests and extra-curricular activities;
- ✓ financial information, including:
 - bank account number(s), name(s) and sort code(s) (used for paying your salary and processing other payments);
 - tax status (including residence status);
 - information related to pensions, national insurance, or employee benefit schemes;
- ✓ work related information, including:
 - details of work history and references from previous employer(s);
 - personal data captured in the work product(s), notes and correspondence you create while employed by or otherwise engaged to work for the school;
 - details of professional activities and interests;
 - your involvement with and membership of sector bodies and professional associations;
 - information about your employment and professional life after leaving the school, where relevant (for example, where you have asked us to keep in touch with you);
- ✓ any other information relevant to your employment or other engagement to work for the School.

Where necessary the School may in regards to employment or other engagement to work for the School, we may also collect special categories of data, and information about criminal convictions and offences, including:

- ✓ information revealing racial or ethnic origin;
- ✓ trade union membership, where applicable;
- ✓ information concerning health and medical conditions; (for example, where required to monitor and record sickness absences, dietary needs, or to make reasonable adjustments to your working conditions or environment);
- ✓ biometric information, for example where necessary for school security systems;
- ✓ information concerning sexual life or orientation (for example, in the course of investigating complaints made by you or others, for example concerning discrimination);

- information about certain criminal convictions (for example, where this is necessary for due diligence purposes, or compliance with our legal and regulatory obligations).

However, this will only be undertaken where and to the extent it is necessary for a lawful purpose in connection with your employment or other engagement to work for the school.

The bases for processing your personal data, how that data is used and whom it is shared with:

(i) *Entering into, or fulfilling, our contract with you*

We process your personal data because it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract, such as a contract of employment or other engagement with us. In this respect, we use your personal data for the following:

- administering job applications and, where relevant, the offer of a position at the School;
- carrying out due diligence checks, whether during the application process or during your employment at the School, including checking references in relation to your education and your employment history;
- once you are employed or engaged by the School in any capacity, for the performance of the contract of employment (or other agreement) between you and the School;
- for salary purposes and to administer benefits (including pensions) in connection with your employment or other engagement with us;
- to monitor attendance and performance, including appraisals;
- promoting the School to prospective parents and others, including by publishing the work product(s) created by staff whilst employed by, or otherwise engaged by, the School;
- for disciplinary purposes, including conducting investigations where required;
- for other administrative purposes, for example to update you about changes to your terms and conditions of employment or engagement, or changes to your pension arrangements;
- for internal record-keeping, including the management of any staff feedback or complaints and incident reporting;
- for any other reason or purpose set out in your contract of employment (or other agreement) with the School.

(ii) *Legitimate Interests*

The School processes personal data because it is necessary for our (or sometimes a third party's) legitimate interests. Our "legitimate interests" include our interests in running the school in a professional, sustainable manner, in accordance with all relevant ethical, educational, charitable, legal and regulatory duties and requirements (whether or not connected directly to data protection law). In this respect, we use your personal data for the following:

- providing prospective staff with information about the School and what it is like to work for us (where you have asked for this, most obviously before you have made a formal application to work for us);
- for security purposes, including by operating security cameras in various locations on the School's premises;
- to enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;
- to provide education services to pupils;

- to safeguard pupils' welfare and provide appropriate pastoral care;
- to carry out or cooperate with any School or external complaints, disciplinary or investigatory process;
- for the purposes of management planning and forecasting, research and statistical analysis;
- in connection with organising events and social engagements for staff;
- making travel arrangements on behalf of staff, where required;
- contacting members of staff, their family members and 'next of kin' for business continuity purposes, to confirm your absence from work, etc.;
- publishing images and likenesses in connection with employment or engagement with the School;
- to monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's IT Acceptable Use policy.

(iii) Legal Obligations

The School also processes personal data to comply with its legal obligations, notably those in connection with employment, charity and company law, tax law and accounting, and child welfare. In this respect, personal data is used for the following:

- to meet the School's legal obligations (for example, relating to child welfare, social protection, diversity, equality, and gender pay gap monitoring, employment, and health and safety);
- for tax and accounting purposes, including transferring personal data to HMRC to ensure that you have paid appropriate amounts of tax, and in respect of any Gift Aid claims, where relevant;
- 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.

(iv) Special categories of data

The School processes special categories of personal data (for example, but not exclusively, data concerning health, religious beliefs, racial or ethnic origin, sexual orientation or union membership) or criminal convictions and allegations for the reasons set out below.

The School will process this data on the basis that such processing is necessary to carry out obligations and exercise rights both the employees and the School's) in relation to employment.

In particular, the School processes the following types of special category personal data for the following reasons:

- employees physical or mental health or condition(s) in order to record sick leave and take decisions about their fitness for work, or (in emergencies) act on any medical needs an employee may have;
- recording racial or ethnic origin in order to monitor the School's compliance with equal opportunities legislation;
- trade union membership, in connection with rights as an employee and the School's obligations as an employer;
- categories of personal data which are relevant to investigating complaints made by an employee or others, for example concerning discrimination, bullying or harassment;

- data about any criminal convictions or offences committed by an employee or prospective employee, for example when conducting criminal background checks with the DBS, or where it is necessary to record or report an allegation (including to Police or other authorities, with or without reference to you);

The School will process special categories of personal data for lawful reasons only, including but not exclusively:

- when explicit consent has been given and when consent is appropriate;
- it is necessary to protect a person's vital interests, for example, where an individual has a life-threatening accident or illness in the workplace and the School has to process their personal data in order to ensure they receive appropriate medical attention;
- it is necessary for some function in the substantial public interest, including the safeguarding of children or vulnerable people, or as part of a process designed to protect others from malpractice, incompetence or unfitness in a role (or to establish the truth of any such allegations); or
- it is necessary for the establishment, exercise or defence of legal claims, such as where any person has brought a claim or serious complaint against the School or an employee.

Sharing your information with others

For the purposes referred to in this Appendix and relying on the bases for processing as set out above, we may share employees personal data with certain third parties. We may disclose limited personal data (including in limited cases special category or criminal data) to a variety of recipients including:

- other employees, agents and contractors (e.g. third parties processing data on our behalf as part of administering payroll services, the provision of benefits including pensions, IT etc. – although this is not sharing personal data in a legal sense, as these are considered data processors on our behalf);
- DBS and other relevant authorities and agencies such as the Department for Education, NCTL, the ICO, Charity Commission and the local authority;
- other schools in the Trust;
- external auditors or inspectors;
- external advisers or consultants to the School where it is necessary for the School to obtain their advice or assistance;
- third parties and their advisers in the unlikely event that those third parties are acquiring or considering acquiring all or part of our School, or we are reconstituting or setting up some;
- when the School is legally required to do so by a court order, government body, law enforcement agency or other authority of competent jurisdiction, for example HMRC or the Police.
- prospective employers in the form of a reference where the School is required to do so in compliance with our legal obligations.

How long your information is kept

Personal data relating to unsuccessful job applicants is deleted within 6 months of the end of the application process, except where we have notified you we intend to keep it for longer (and you have not objected).

For employees, subject to any other notices that we may provide to you, we may retain your personal data indefinitely after your contract of employment (or equivalent agreement) has expired

or been terminated. This is because staff files are not weeded prior to archive to avoid subjectivity and some of the information is required for safeguarding purposes. Staff files are scanned and archived electronically in their entirety.

Individuals Rights

The body of this Privacy Notice and Appendix 1 of this document detail the rights of a 'data subject' which, for School staff, are the same as any other member of the public. Further information can be found on the Information Commissioner's website www.ico.org.uk.

This notice

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

Contact and complaints

Any queries about this Privacy Notice or how the School processes your data, can be addressed to a Line Manager or via email to data@hamptonschool.org.uk.

Alternatively, the matter can be addressed via the relevant staff grievance procedure –

[A12 Grievance Procedure Support Staff ver 2017-11 Ratified.pdf](#);

[A13 Grievance Procedure Teachers ver 2017-11 Ratified.pdf](#)

If internal procedures do not satisfactorily resolve any issues, a complaint can be made to the Information Commissioner's Office at: www.ico.org.uk. The ICO does recommend that resolution is sought before any referral.