HEADINGTON RYE
OXFORD

Data Protection (Privacy) Notice

Reviewed by:	Bursar
Date of last Review	June 2026
Next Review Date:	June 2027
Reference:	• The UK General Data Protection Regulation • The Data Protection Act 2018 • The Data (Use and Access) Act 2025 • The Privacy and Electronic Communications Regulations 2003 (PECR)) • The Protection of Freedoms Act 2012 (biometrics and CCTV)

Headington Rye Oxford, Oxford OX3 7TD Tel No (01865) 759100 Fax No (01865) 760268

PRIVACY NOTICE

WHO WE ARE

Headington Rye Oxford Limited is a company limited by shares in accordance with the Memorandum and Articles of Association adopted on the 23rd July 1915. The School is both a charity (309678) and a registered company (00141076). Its registered address is Headington School, Headington Road, Oxford, OX3 0BL. Headington School merged with Rye St Antony on the 19th March 2024 and changed its name to Headington Rye Oxford Limited on the 30th August 2024 in order to reflect the new operating model.

The School's charitable object is to advance education for the benefit of the public in any way that the trustees see fit, including the provision, maintenance and support of a school or schools, wherein the core values and teaching shall reflect a broad Christian ethos, but also supporting pupils of all faiths and with none.

In accordance with the Data Protection Act 2018 and the General Data Protection Regulation (EU 2016/679), the School is a Data Controller which means it determines how an individual's personal data is processed and for what purposes. The School has a wholly owned trading subsidiary company, Headington School Services Limited, which is also covered by this Data Protection (Privacy) Notice.

WHAT THIS PRIVACY NOTICE IS FOR

This policy is intended to provide information about how the School will use (or "process") personal data about individuals including: its staff including volunteers and Governors, its current, past and prospective pupils and their parents, carers or guardians (referred to in this policy as "parents").

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff, parents and pupils are all encouraged to read this Privacy Notice and understand the School's obligations to its entire community.

This **Privacy Notice** applies alongside any other information the School may provide about a particular use of personal data, for example when collecting data via an online or paper form.

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

- any contract between the School and its staff or the parents of pupils
- the School's policy on taking, storing and using images of children
- the School's CCTV policy
- the School's retention of records policy
- the School's safeguarding and pastoral policies
- the School's health and safety policies, including how concerns or incidents are recorded
- the School's IT policies, including its Acceptable Use Policy

Anyone who works for, or acts on behalf of, the School (including staff, volunteers, Governors and service providers) should also be aware of and comply with this Privacy Notice and the School's Data Protection Policy, which also provides further information about how personal data about those individuals will be used.

RESPONSIBILITY FOR DATA PROTECTION

The School has appointed the Director of Operations as the Privacy and Compliance 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 endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law.

The Privacy and Compliance Officer can be contacted by email at compliance@headington.org or by writing to:

The Privacy and Compliance Officer
The Bursary
Headington School
Oxford
OX3 7TD

WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to staff, pupils and parents, the School needs to process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of its daily operation.

Some of this activity the School will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with its staff, or parents of its pupils.

Other uses of personal data will be made in accordance with the School's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data.

The School expects that the following uses will fall within that category of its (or its community's) "**legitimate interests**":

- For the purposes of pupil selection (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 alumnae of both Headington School and Rye St Antony, as well as the wider 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 and relevant interests;
- For the purposes of general research and wealth screening in order to improve our understanding of our alumnae and supporters to help inform our fundraising strategy and target our communications more effectively;

- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
- 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 Acceptable Use Policy;
- To make use of photographic images of pupils in School publications, on the School website, in advertising and (where appropriate) on the School's social media channels in accordance with the School's policy on taking, storing and using images of children;
- For security purposes, including CCTV in accordance with the School's CCTV policy;
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process;
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School;

In addition, the School will on occasion need to process **special category personal data** (concerning health, ethnicity, religion, 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:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's 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 pupil;
- To provide spiritual education in the context of any religious beliefs;
- In connection with employment of its staff, for example DBS checks, welfare, union membership or pension plans;
- 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.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);
- bank details and other financial information, eg 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;
- Nationality and other immigration status information (eg right to enter, live and work o] study in the United Kingdom), including copies of passport information;
- past, present and prospective parents' employment information;
- where appropriate, information about individuals' health and welfare and contact details for their next of kin;
- references given or received by the School about pupils and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- correspondence with and concerning staff, pupils and parents past and present;
- 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 policy on taking, storing and using images of children);
- past, present and prospective staff personnel files, including in connection with academics, employment or safeguarding;

HOW THE SCHOOL COLLECTS DATA

Generally, the School receives personal data from the individual directly (including, in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of routine interaction or communication (such as email, written assessments or conversations with staff and volunteers).

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

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

Occasionally, the School will need to share personal information relating to its community with third parties, such as:

- professional advisers (eg lawyers, insurers and accountants);
- Government authorities (eg HMRC, DfE, police or the local authority) and
- appropriate regulatory bodies eg National College for Teaching and Leadership, the Independent Schools Inspectorate**,** the Charity Commission or the Information Commissioner;
- Mailing houses or data-cleansing providers working with the Development Office.

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. Particularly strict rules of access apply in the context of:

- medical records held and accessed only by the School Doctor, School Nurses and appropriate medical staff under their supervision, or otherwise in accordance with express consent;
- safeguarding files.

However, a certain amount of any medical, pastoral and SEN 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.

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

For the purposes of maintaining a safe and secure environment, the School reserves the right to monitor all internet traffic and all domain joined devices through the use of appliance based and application level filtering and monitoring services.

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 assurances that personal data will be kept securely and only in accordance with the School's specific directions.

HOW LONG WE KEEP PERSONAL DATA

The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary staff and pupil personnel files is up to seven 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 our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, you should contact the Privacy and Compliance Officer by emailing compliance@headington.org. However, you should also bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data even following such request. Please refer to the School's Record Retention Policy for further details.

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").

KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

The School 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 post, email and telephone. Unless the relevant individual objects, the School will also:

- 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 Headingtonians' Committee, Rye St Antony Alumnae and the Headington Rye Oxford Staff Association.

- contact parents and/or alumnae, including via the organisations above, by post and email in order to promote and raise funds for the School and, where appropriate, other worthy causes.
- collect information from publicly available sources about parents' and former pupils' occupation and activities, in order to maximise the school's fundraising potential.

Should you wish to limit or object to any such use, or would like further information about them, please contact the Privacy and Compliance Officer in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the School is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

YOUR RIGHTS

Individuals, pupils, parents and alumnae 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 have it transferred to others, or for the School to stop processing it but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the Privacy and Compliance Officer at compliance@headington.org.

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 for information is manifestly excessive or similar to previous requests, the School may ask you to reconsider, or require a proportionate fee, but only where Data Protection Law allows it and in accordance with relevant guidance.

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 or professional privilege such as legal advice given to or sought by the School, or documents prepared in connection with a legal action.

You should be aware that UK GDPR rights (including the right of access) are limited to your own personal data, and certain data is exempt. This will include information which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations – please see further below – or information which is subject to legal privilege (for example legal advice given to or sought by the school, or documents prepared in connection with a legal action, or where a duty of confidence is owed by a legal adviser).

The School is also not required to:

- disclose any pupil examination scripts (or other information consisting solely of pupil test answers, potentially including in mock exam scripts or other types of exams / tests

used to assess performance – although markers' comments may still be disclosable if they constitute pupil personal data); or

- provide examination or other test marks ahead of their ordinary publication date, nor share any confidential reference held by the school that was (or will be) given for the purposes of the education, training, appointment or employment of any individual.

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 proportionate legitimate interest identified in this Privacy Notice. Generally, if the School still considers the processing of the personal data to be reasonably necessary, it is entitled to continue. All such requests will be considered on their own merits.

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. A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger pupils, the law still considers the information in question to be the child's. For older pupils, the parent making the request may need to evidence their child's authority for the specific request. Requests not considered in the child's best interests may sometimes be refused.

Pupils in the Senior School 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. Prep School children may however be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about pupils without their consent. The School may consider there are lawful grounds for sharing with or without reference to that pupil.

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, court orders, or pastoral issues.

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

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 not be relying on consent but 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 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 such as an alumnae or parents' association has been requested).

WHOSE RIGHTS

The rights under data protection law belong to the individual to whom the data relates. However, the School will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils – for example, under the Parent Contract, or via a form. Parents and pupils should be aware that this is not necessarily the same as the school relying on strict consent.

Where consent is required, it may in some cases be necessary or appropriate – given the nature of the processing in question, and the pupil's age and understanding – to seek the pupil's consent, either alongside or in place of parental 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, 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. That is unless, in the School's opinion, there is a good reason to do otherwise.

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.

Pupils are required to respect the personal data and privacy of others and to comply with the School's relevant policies including the IT Acceptable Use Policy and School Rules. Staff are under professional duties to do the same, covered under the relevant staff policy.

DATA ACCURACY AND SECURITY

The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the School of any significant changes to important information, such as contact details, held about them. Responsibility for changes in information relating to pupils rests with the parent.

An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law). Please see above for details of why the School may need to process your data and who you may contact if you disagree.

The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices and access to School systems. All staff and Governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

THIS POLICY

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

QUERIES AND COMPLAINTS

Any comments or queries regarding this policy should be directed to the Privacy and Compliance Officer using the following email address compliance@headington.org.

If you believe that the School has not complied with this Privacy Notice or acted otherwise than in accordance with data protection law, you should email compliance@headington.org with details of your complaint. The School will acknowledge your complaint within 30 days of receipt and will investigate and inform you of the outcome of your complaint without undue delay (keeping you informed of progress as necessary).

If you are not satisfied with the outcome of your complaint, or if you feel the School has not handled it appropriately, you have the right to complain to the Information Commissioner's Office (ICO).