

STUDENT PRIVACY NOTICE

INTRODUCTION

This policy is to help you understand how the school¹ will use (or "process") personal data about you and what we do with that information. Personal information identifies you as an individual and relates to you and includes your contact details, financial and medical information as well as images, recordings and CCTV.

We are giving you this notice because you are mature enough to make decisions about your personal information. If you have any questions, please speak to the Compliance & Privacy Officer who you may contact at gdprcompliance@lyceeinternational.london.

Data Protection Law gives you the right to understand how your data is used. LIL is a **Data Processor** for the purposes of Data Protection Law which means it **determines how an individual's personal data is processed and for what purposes**.

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.

WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to provide you with education, we require certain pieces of personal information as outlined below. The school expects that the following uses will fall within the category of its (or its community's) "**legitimate interests**":

- Information from the Admissions department including details from your previous school and other professionals such as local authorities and doctors;
- Information about your family circumstances to safeguard your welfare and provide appropriate pastoral care;
- Any criminal proceedings or convictions which relate to you, to ensure that we safeguard you and the school community;
- CCTV for security purposes in public areas;
- Photographs or recordings of you at school functions and performances to use on the school website or social media;
- We may send you information such as newsletters to keep you up to date with school life and fundraising events;

¹ The school, Lycee International de Londres is a company registered in England (number 09033139), 54 Forty Lane, Wembley HA9 9LY. It is a registered charity (number 1160719).

- We will retain your contact information when you leave the school to pass on to our alumni association and to maintain the relationship with our school community, including direct marketing and/or fundraising activity;
- To give and receive information and references about you, including relating to outstanding fees or payment history, to/from any educational institution that you attended or where it is proposed you attend; and to provide references to your potential employers;
- To enable you 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 carry out or cooperate with any school or external complaints, disciplinary or investigation process; and
- 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). These reasons will include:
 - To safeguard your 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 medical conditions or other relevant information where it is in your 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 that you have;
 - To provide moral education respectful of all beliefs;
 - As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are SEN, health or safeguarding elements; or
 - 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 may include by way of example:

- Names, addresses, date of birth, telephone numbers, email addresses and other contact details;
- CCTV recordings and images

- Bank details and other financial information, e.g. about parents who pay fees to the school;
- past, present and prospective students' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- where appropriate, information about your health and welfare, and contact details for your next of kin;
- References given or received by the school about you, and relevant information provided by previous educational establishments and/or other professionals or organisations working with you;
- Correspondence with and concerning staff, students and parents past and present; and
- Images of you (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);

HOW THE SCHOOL COLLECTS DATA

Generally, the school receives personal data from your parents or you directly. This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments). In some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities working with you; 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 (e.g. lawyers, insurers, PR advisers and accountants);
- Government authorities (e.g. HMRC, DfE, police or the local authority); and
- Appropriate regulatory bodies

For the most part, personal data collected by the school will remain within the school, and will be processed by appropriate members of staff in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- Medical records are held in locked files accessed only by Health Centre staff. Information is shared on the Special Needs register when it is about allergies and Personal Medical Plans (PAI) to ensure all faculty staff are aware of their students' needs;
- Pastoral or learning support including professional supporting documents are kept in locked filing systems. These may only be consulted in the presence of the Head of Wellbeing or the Dean of Students and only in the academic interest of the relevant child; and

- Safeguarding files are in a locked filing system and only accessible by the Designated Safeguarding Leads.

However, a certain amount of any student's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education required. The School uses Pronote, a secure software application which is used to record behavioural issues, sanctions, and special educational needs.

In accordance with UK Data Protection Act 2018, some of the school's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the school's specific directions.

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 it for a legitimate and lawful reason. Typically, the legal recommendation for ordinary student files is until the student is 25 years old. 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 which you no longer believe to be relevant is considered for erasure, please contact gdprcompliance@lyceeinternational.london. However, please bear in mind that the school will often have lawful and necessary reasons to hold on to some personal data even following such a request.

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 that fact in order to fulfil your wishes (called a "suppression record").

YOUR RIGHTS

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the school, and in some cases ask for it to be erased or amended or 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 gdprcompliance@lyceeinternational.london.

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 30 days 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.

- Requests that cannot be fulfilled

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals, or information which is subject to legal professional privilege.

The school is not required to disclose any student examination scripts, other information consisting solely of student test answers, provide examination or other test marks ahead of any ordinary publication.

We will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

- Student requests

You can make subject access requests for your own personal data, provided that, in the reasonable opinion of the school, you have sufficient maturity to understand the request you are making. A student 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 students, the law still considers the information in question to be the child's: for older students, the parent making the request may need to evidence your authority for the specific request.

All subject access requests will therefore be considered on a case by case basis.

- Parental requests.

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 students without their consent. The school may consider there are lawful grounds for sharing with or without reference to that student.

Your parents will in general receive educational and pastoral updates about you, 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 your express wishes.

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

- Consent

Where the school is relying on consent as a means to process personal data, you may withdraw this consent at any time (subject to similar age considerations as above). Examples where we do rely on consent are: certain types of uses of images and certain types of fundraising activity. 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 which 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. a parent contract, or because services or membership of an organisation such as an alumni 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 students - for example, under the parent contract, or via a form. Parents and students should be aware that this is not necessarily the same as the school relying on strict consent (see section on Consent above).

Where consent is required, it may in some cases be necessary or appropriate - given the nature of the processing in question, and the student's age and understanding - to seek 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, the school will assume that your consent is not required for ordinary disclosure of your personal data to your parents, e.g. for the purposes of keeping your parents informed about your activities, progress and behaviour, and in the interests of your welfare. That is unless, in the school's opinion, there is a good reason to do otherwise.

However, where you seek to raise concerns confidentially with a member of staff and expressly withhold your agreement to your personal data being disclosed to your 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 you or other students, or if required by law.

You are required to respect the personal data and privacy of others, and to comply with the school's **Students' Use of ICT and Electronic Devices Policy** and the school rules.

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 as accurate as possible. Individuals must please notify gdprcompliance@lyceeinternational.london of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate 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 of 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 they will receive relevant training.

THIS NOTICE

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 on this notice should be directed to the Privacy & Compliance Officer gdprcompliance@lyceeinternational.london

For further detail about data protection, please refer to the Data Protection Policy

If an individual believes that the school has not complied with this policy or acted otherwise than in accordance with UK Data Protection Act 2018, they should utilise the school complaints procedure and should also notify gdprcompliance@lyceeinternational.london. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the school before involving the regulator.

Policy created in May 2018

Reviewed in:

- May 2023
- April 2022
- December 2021
- December 2020