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Heath Mount School

Website Privacy Notice

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Introduction

At Heath Mount School we value the rights and freedoms of all people. This includes respecting your privacy and protecting your personal data. This privacy notice describes how we collect and use (or "process ") your information. It also tells you how to contact us as well as outlining what rights you have with regard to your personal data.

Who are we?

Heath Mount School ("we", "our", "us") is a school located in Woodhall Park, Watton-at-Stone, Hertfordshire, SG14 3NG. We are an independent day and boarding school for boys and girls between the ages of 2 and 13.

What is the purpose of this website privacy notice?

The purpose of this privacy notice is to provide detailed information about how we process personal data.

Our privacy notice should be read in conjunction with our other policies and terms and conditions which make reference to personal data, including our Data Protection Policy.

Please read this notice carefully and, if you have questions regarding your personal data or its use, please contact the Data Protection Lead (DP L) by emailing privacy@heathmount.org

If you consider your personal data is not being used appropriately in accordance with this policy, you may contact us at privacy@heathmount.org
Additionally, you are entitled to lodge a complaint with the Information Commissioner's Office (ICO) by contacting them at https://ico.org.uk/global/contact- us/

We will update this Privacy Notice from time to time. Any substantial changes that affect how we process your personal data will be notified on our website and to you directly, as far as practicable.

What is personal data?

The term 'personal data' refers to any information which identifies you or can be used to identify a data subject when used in conjunction with other information.

The term 'data subject' describes the person about whom the personal data is about.

What personal data do we collect about you?

We process personal data about visitors to our website; prospective, current and past: students and their parents; staff and contractors; donors and supporters; and other individuals connected with or visiting our school.

The personal data we process takes different forms. Examples include:

- names, addresses, telephone numbers, e-mail addresses, emergency contact information;
- IP addresses, location data, and website statistics and analytics;
- website cookies (see Cookie Policy);
- students' date of birth, nationality, family details;
- admissions, academic, disciplinary and other education related records, references, examination scripts and marks;
- parents' employment data;
- images, audio and video recordings;
- financial information and identification documents (e.g. for bursary assessment or for fundraising);
- employee and former employee data including recruitment, training, performance management, payroll, and other HR information.

As a school, from time to time we also need to process personal data which is designated as "sensitive" or "special category personal data" in order to facilitate our school operations and activities. Such data includes personal data regarding a data subject concerning:

- health;
- special education needs;
- biometric data (e.g. fingerprints)
- information relating to safeguarding and child protection/welfare
- race ethnicity;
- criminal records or convictions; or
- religion.

How do we obtain your information?

We collect most of the personal data we process directly from the data subject concerned (or often in the case of students, from their parents. In some cases, we collect data from third parties (for example, referees/references, and previous schools) or from publicly available resources.

We also collect data about you when:

- you have expressed an interest in having a student attend our school;
- you have registered to attend (or have attended) one of our events;
- you visit our website;
- you sign up to receive email our newsletter and/or prospectus;
- you have expressed an interest in working for, or with, us; or
- you are employed by us or an organisation with whom we have a business relationship.

How do we use your personal data?

Whenever we use (or "process") any personal data (sensitive/special category or otherwise), we do so in accordance with applicable laws and regulations (including

with respect to safeguarding or employment). Personal data held by us is processed by appropriate members of staff for the purposes for which the data was provided.

We take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems.

In the course of school business, we share personal data (including special category personal data where appropriate) with third parties such as examination boards, the school's Nurse/Doctor, the school's professional advisors and relevant authorities. We may also be required to share your personal data with other organisations for legal or statutory purposes, or where we have your consent to do so.

We may also share data with the parent –teacher association in order to facilitate parental participation. Moreover, some of our systems are managed or operated by third parties (e. g. hosted databases, school website, school calendar, school post and my school portal or cloud storage providers).

Where third parties process personal data on our behalf, we put appropriate contractual arrangements in place requiring them to protect personal data and process it only in accordance with our instructions. Other organisations may process personal data as independent controllers in accordance with their own legal obligations. We do not transfer personal data you have provided unless we are satisfied that the personal data will be afforded an equivalent level of protection.

Additionally, the School will provide information to each pupil/parent (which can include relevant personal data of the respective child) as necessary to facilitate school operations. Moreover, we may transfer data to other countries but in doing so will rely either on the existence of adequacy agreements, the UK Addendum to the EU Standard Contractual Clauses or International Data Transfer Agreements as part of agreements with data processors. For more information on how we transfer data to other countries is available upon request by contacting our Data Protection Officer at privacy@heathmount.org

Purposes for which we process personal data

We process personal data to support our operation as an independent school. In particular, we use the data for:

- the selection and admission of students
- the provision of education and enrichment to our students, including the administration of our curriculum; monitoring student academic progress and educational needs; reporting on the same internally and to parents; administration of students' entries to public examinations, and providing references for students (including after a student has left);
- the provision of educational support and related services to students;
- the safeguarding of students' welfare and provision of pastoral care, welfare, health care services and support.
- the provision of a safe and secure environment for students, staff, and visitors to the school.

- management of student boarding at the boarding house;
- the planning and delivery of events, school trips, and extra-curricular programmes, including sports and activities.
- compliance with legal and regulatory requirements;
- operational management including the compilation of student records; the administration of invoices, fees and accounts; the management of school property; the management of security and safety arrangements (including the use of CCTV in accordance with our CCTV Policy and monitoring of the school's IT and communications systems in accordance with our Acceptable Use Policy; the administration and implementation of our school's rules and policies for students and staff; and the maintenance of historic archives;
- staff administration including the recruitment of staff/engagement of contractors; administration of payroll, pensions and sick leave; review and appraisal of staff performance; conduct of any grievance, capability or disciplinary procedures; and the maintenance of appropriate human resources records for current and former staff; and providing references;
- advancement including fundraising;
- analysing website traffic, demographics and behaviour through the use of analytical tools and cookies;
- the promotion of our school through our website, prospectus, social media accounts and other publications and communications. Where photographs, video or other digital media are shared with external organisations or marketing partners for promotional purposes, we will do so where appropriate consent has been obtained.
- maintaining relationships with our alumni and former employees.
- for keeping a record of historical and memorable events relevant to the maintenance of a historical record.

What is our legal basis for processing your personal data?

We may process your personal data for the above purposes based one or more of the following legal bases:

- we have an individual's consent to do so (or their parent's, if appropriate). You can withdraw your consent at any time by completing the permissions form or emailing owenso@heathmount.org
- it is necessary for the performance of a contract (e.g. an employment contract with a member of staff or for provision of services under the enrolment contract);
- it is necessary for our compliance with our legal obligations. In this respect, we may use personal data to exercise or perform any right or obligation conferred or imposed by law in connection with employment; and/or 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;
- it is necessary for our or a third party's legitimate interest. These "legitimate interests" include our interests in providing high quality education, fostering relationships with those in the school community, and our interests in managing and operating the school to the best of our abilities.

Where we process special category data, we will also rely upon further Article 9 condition for processing, such as:

- it is necessary to protect an individual's vital interests (in certain limited circumstances, for example where a student has a life-threatening accident or illness while at school and we have to process that student's personal data in order to ensure the student receives prompt and appropriate medical attention);
- it is necessary for the establishment, exercise or defense of legal claims;
- it is necessary for reasons of substantial public interest, including safeguarding purposes;
- it is necessary for medical purposes, including medical diagnosis and the provision of health care or treatment for students, managing related health care systems, and/or for assessing the working capacity of staff;
- it is necessary for archiving, research or statistical purposes;

Consent

Under data protection laws, the rights belong to the individual to whom the data relates (i.e. the data subject). However, where consent is required as the lawful basis for processing personal data relating to students we will often rely on parental consent unless it is more appropriate to rely on the student' s consent.

In general, we will assume that students' consent is not required (and that other lawful bases are more appropriate, as described above) for ordinary disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the student's activities, progress and behaviour, and in the interests of the student's welfare, unless, in the school's opinion, there is a good reason to do otherwise.

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

What are our responsibilities for looking after your personal data ?

In every case, when we are collecting or using personal data, we will comply with the requirements of data protection legislation, including GDPR and UK DPA (2018).

What rights do you have over your personal data?

Under data protection laws, you have the right to:

- obtain access to, and copies of, the personal data that we hold about you (subject to legal exceptions);
- correct the personal data we hold about you if it is incorrect;
- require us to erase your personal data in certain circumstances;
- require us to restrict our data processing activities in certain circumstances;
- receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of your transmitting that personal data to another data controller;
- 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 (including a right to object to receiving fundraising or communications, and to object to our profiling you for the purposes of fundraising or keeping in touch);

- not be subject to decisions based solely on automated processing (including profiling) which produce legal or similarly significant effects, and to request human involvement in such decision-making.
- where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal.
- Make a complaint about how we have processed your personal data, or how we have responded to a data protection rights request.

If you would like to exercise any of your rights under data protection law for which we are the data controller, please make your request by emailing us at privacy@heathmount.org
Please note that these rights are not absolute, and we may be entitled or required to refuse requests where exceptions or exemptions apply.

We will respond to any such written requests as soon as is reasonably practicable and in any event within statutory time limits.

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

If you have any questions or concerns about how we are using your personal data or if you would like to exercise any of your information rights, please contact us at privacy@heathmount.org

How do we retain and store your personal data?

All personal data is securely stored in accordance with legal requirements. We retain personal data only for legitimate purposes, relying on one or more of the lawful bases as set out above, and only for so long as necessary for those purposes, or as required by law.

Further information about our retention periods is contained in our Records Retention Schedule which can be made available on request.

Contact us

If you have questions, requests or issues, please let us know how we can help. Our Data Protection Lead can be reached at privacy@heathmount.org

Monitoring and Review

Governors Committee Reviewing	Buildings and Infrastructure Committee
Period of review	September 2026

Person responsible for implementation and monitoring	Bursar / Network Manager
Related policies	Cookie Policy CCTV Policy IT acceptable Use Policy Data Protection Policy Staff Privacy Policy Records Retention Schedule