

Parents, Pupils, Alumni and Friends of Heritage Data Privacy Notice

Introduction

Heritage School is the main operating activity of Child Light Ltd (Company Number 2928829, Charity Number 1039099). The registered office of Child Light Ltd is 17-19 Brookside, Cambridge, CB2 1JE. For the purposes of Data Protection Law, Child Light Ltd (referred to in this policy as "the School") is the designated Data Controller.

This Privacy Notice is intended to provide information about how the School will collect, use and hold (or 'process') personal data about individuals including: current, past and prospective pupils; their parents, carers or guardians (referred to in this policy as 'parents') and alumni and Friends of Heritage who may wish to stay informed about the work of the school. The Privacy Notice also sets out some of the rights that you have, under Data Protection law, in respect to the data we hold about you. For younger pupils, please see Appendix 1 for a Data Protection Quick Reference Guide. The School also has the following privacy notices that may apply to some parents, alumni or Friends of Heritage: Privacy Notice for Staff and Recruitment Privacy Notice.

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:

- Terms and Conditions of the Parent Contract
- the School's procedures on the use of photographs and videos (see Use of Images Policy);
- the School's guidelines for data storage and retention
- the School's Safeguarding Policy and Health and Safety Policy, including how safeguarding concerns or first aid incidents are recorded;
- the School's IT policies, including its Acceptable Use of Screens Policy and Word Processor Use Policy

Anyone who works for, or acts on behalf of, the school (including staff, volunteers, trustees and contractors) should also be aware of and comply with this Privacy Notice. The Privacy Notice for Staff and the School's Data Protection Policy, also provide further information about how personal data about those individuals will be used.

Responsibility for Data Protection

The School has appointed the Compliance Officer, who will deal with requests and enquiries concerning the School's uses of your personal data (see section on Your Rights below) and will endeavour to ensure that all personal data is processed in compliance with this privacy notice and Data Protection law. The Compliance Officer can be contacted via the School Office on 01223 350615 or by post at Heritage School, 17-19 Brookside, Cambridge CB2 1JE.

Why the School needs to Process Personal Data

In order to carry out our ordinary duties to staff, pupils and parents, the School needs to process a wide range of personal data about our community as part of our daily operations.

Some of this activity the School will need to carry out in order to fulfil our **legal rights, duties or obligations** – including those under a contract with our staff, or parents of our 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 data processing activities will fall within that category of its legitimate interests:

- For pupil selection (and to confirm the identity of prospective pupils and their parents);
- To provide education services and to monitor pupils' progress and educational needs, including where such services are provided remotely (either temporarily or permanently);
- To report to and liaise with parents about their child's progress, welfare and development including by way of regular reports and parents' evenings;
- To organise and manage meetings, events and social engagements for pupils and parents;
- 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 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 (such as the Independent Schools Inspectorate or the Health and Safety Executive);
- To give and receive information and references about past and current 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 statistics about public examinations or other achievements of pupils of the School;
- To safeguard pupils' health and welfare and provide appropriate pastoral care (including following the requirements and recommendations of the government's guidance on Keeping Children Safe in Education (or "KCSIE");
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's Acceptable Use of Screens and Safeguarding 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 in accordance with the School's Use of Images Policy;
- 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;

- To carry out or cooperate with any School or external complaints, disciplinary or investigation process;
- To promote the School to prospective parents and pupils; 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 sometimes need to process **special category personal data** (such as 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 us by law, or by explicit consent where required. These reasons will 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 health / medical condition or other relevant information where it is in the individual's interests to do so: for example for emergency medical care, to arrange the assessment and diagnosis of a pupil's special educational needs, 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 comply with public health requirements;
- To provide educational services in the context of making reasonable adjustments for a pupil's disability and/or any special educational needs of a pupil;
- As part of any School or external complaints, disciplinary or investigation process that involves such data, for example if there are SEND, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection or health and safety compliance) and to comply with its legal obligations and duties of care.

Finally, the school will on occasion need to process data of persons, such as alumni and Friends of Heritage to make them aware of school activities or fundraising needs. In such cases, the school will seek the **consent** of these individuals to process their personal data. Consent will be via an active "opt in" basis. Those who wish to limit or object to any such use, or would like further information, should contact the Compliance Officer via the School Office. Individuals always have the right to withdraw consent where given, or otherwise object to specific data uses such as fundraising. However, the School is nonetheless likely to retain some personal details (not least to ensure that no more communications are sent to that particular individual).

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) or who transport pupils on behalf of the school in their own car;
- bank details and other financial information, e.g. about parents (or others) who pay fees to the School, and any source of funds and/or anti-money laundering information we are required to collect by law;

- past, present and prospective pupils' academic, disciplinary, admissions, safeguarding and attendance records, and examination scripts and marks;
- nationality and other immigration status information, including copies of passport information;
- information about pupils' health and medical conditions, allergies, special educational needs and family circumstances / living arrangements;
- emergency contact details;
- 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 pupils and parents (past and present);
- images of pupils (and occasionally other individuals) engaging in School activities (in accordance with the School's Use of Images Policy).
- screenshots of pupils' work, communications (eg. emails sent or received) or internet searches carried out on school computers (provided by third party software installed on all student Chromebooks) where the content gives rise to any safeguarding concerns (see the School's Safeguarding and Acceptable Use of Screens Policies).

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 interaction or communication (such as email or written assessments).

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 sources.

We use internet monitoring software for pupils to monitor their use of computers at school. We do not routinely monitor staff email or internet use but may do so as part of an investigation. Please see the School's Acceptable Use of Screens Policy and Safeguarding Policy.

Who has access to Personal Data and who the School shares it with

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 (i.e. on a 'need to know' basis). However, some functions are outsourced to third parties including accounting, cloud storage, and remote monitoring of pupils' use of computers. In accordance with Data Protection law, this type of external data processing is always subject to contractual assurances that personal data will be kept securely and used only in accordance with the School's specific directions.

Occasionally, the School will need to share personal information relating to pupils and parents with third parties, such as:

- correspondence with and concerning pupils and parents (past and present); and
- appropriate contractors, such as visiting music teachers;

- professional advisers (e.g. lawyers, insurers, and accountants);
- examination boards;
- Stage 3 complaints panels, which may include independent panel members such as when a complaint is raised (and in accordance with the School Complaints Procedure, this requires the involvement of independent panel members);
- third parties and their advisers in the event of a possible or actual sale, merger or other restructuring of the school; and
- government authorities (e.g. HMRC, DfE, CAFCASS, Police, Home Office, a relevant public health / NHS body and / or local authority) and/or appropriate regulatory bodies e.g. the Teaching Regulation Agency, the Independent Schools Inspectorate, the Charity Commission etc.
- travel agents, hotels and other accommodation providers, airlines or providers of international transport where we share lists of passengers with passport details (DOB, number, nationality) when taking part on School trips abroad

Access to, and sharing of, Sensitive Data

Particularly strict rules of access apply in the context of ‘special category’ data, most notably:

- health and medical / special needs records; and
- pastoral or safeguarding files

Regarding health and medical/special needs data, the School needs to process such information to comply with statutory duties and to keep pupils and others safe, but the School will ensure only authorised staff can access the information on a need-to-know basis. However, a certain amount of any relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that a pupil requires.

Regarding safeguarding data, the School is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education or ‘KCSIE’) 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. This is likely to include notes on personnel or safeguarding files, low-level concerns records kept about adults (which may include references to pupils or family members), and in some cases referrals to relevant authorities such as the LADO, Children’s Services, CAMHS or the police.

KCSIE also requires that, whenever a child leaves the School to join another school or college, his or her child protection file is promptly provided to the new organisation, along with any other information which the School’s Designated Safeguarding Lead considers material to the ongoing care needs of any pupil. Sometimes, the School will consult with parents as to how these needs are best served, but ultimately the decision as to what information is necessary to share with the new school or college is a safeguarding question that must be reserved to the School. The School will retain a copy of the child protection file in accordance with its retention policy for material related to safeguarding matters. For further information about this, please view the School’s Safeguarding Policy.

Special category data regarding health and medical/special needs records will also need to be shared with some third party providers (eg. caterers or other service providers) on school trips when they need to be made aware of pupils’ dietary or medical/special needs.

How long we keep Personal Data

The School will retain personal data securely and 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 parent and pupil files is up to 7 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, please contact the Compliance Officer via the School Office. 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 the fact in order to fulfil your wishes (called a "suppression record").

Your Rights

Individuals have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require us to correct the personal data we hold about you if it is incorrect;
- to require us (in certain circumstances) to erase your personal data;
- to request that we restrict our data processing activities (and, 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);
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format agreed with you, including for the purpose of you transmitting that personal data to another data controller;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. The School will endeavour to respond to any such requests as soon as is reasonably practicable and in any event within statutory time-limits.

Rights of Access

The School will be better able to respond quickly to smaller, targeted requests for information made during term time. If the request for information is manifestly excessive or similar to previous requests, the school may ask you to reconsider, or require a reasonable fee for the administrative costs of complying with the request, or in certain cases refuse the request (but only where Data Protection law allows it, and in accordance with relevant regulatory guidance).

If you consider that the personal data we hold on you is inaccurate, please let us know. However, the School will not necessarily delete or amend views, opinions, notes or records purely on the request of an individual who disputes the account, although we may keep a record of all parties' viewpoints.

Requests that cannot be fulfilled

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.

Requests by or on behalf of pupils

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?" below). 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 aged 12 and above 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. Slightly younger children, may however be sufficiently mature, to have a say in this decision, depending on the child and the circumstances.

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 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 School's Terms & Conditions. 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.

Consent

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). Examples where we do rely on consent include certain types of uses of images (parental consent given on behalf of child) and certain types of fundraising activity (consent provided by alumni and friends) . 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 alumni or Friends of Heritage 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, the School's Terms and Conditions, or via a form. Parents and pupils 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 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, e.g. Acceptable Use of Screens, Anti-bullying and Behaviour Policies.

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 please notify the School Office of any 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, or 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.

Queries and Complaints

Any comments or queries on this Privacy Notice should be directed to the Compliance Officer via the School Office.

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 follow the School's Complaints Procedure and should also notify the Bursar or the Head. We will acknowledge receipt of your complaint as soon as practicable and within 30 days of receiving it.

The School will aim to provide outcomes to complaints without undue delay (keeping you informed of progress as necessary) and within three months, unless exceptional circumstances apply. You have the right to escalate a complaint to the Information Commissioner's Office ("ICO") if dissatisfied with the outcome. A complaint cannot be referred to the ICO until the School's Complaints Procedure has been concluded.

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.

Authorised by	Jason Fletcher
Date	May 2026

Review date	May 2027
Circulation	Staff, parents, pupils, alumni and Friends of Heritage via email (April 2025) and via website

APPENDIX 1 - Pupil Data Protection Quick Reference Guide

Data Protection for Pupils	
Understand how we collect your data and what we do with it	
1	Personal Data Is information that the School holds about you and which identifies you, such as your address, medical details and exam results.
2	Why we need your data The primary reason for using your data is to provide you with an education and look after you while you are at school.
3	How we get your data Admission forms give us lots of personal information. Your old school may share information about you. Sometimes other professionals such as doctors, will share information with us to help look after you.
4	Examples of types of data processed by the school Names, addresses, telephone numbers, medical data, references, behaviour reports, homework you've submitted, images of you engaging in school activities.
5	Examples of how we use your data To tell teaching staff if you have any additional learning needs or to monitor your email/computer use in order to provide a safe environment for learning. Or to tell appropriate staff if you are allergic to something or if you need extra help with some tasks.
6	Sharing data with others The school may share your data with other organisations eg. exam boards; report some of your information to the government eg. the Department for Education. Also, if your parents consent us to do so, your photographs or videos may be used on websites or social media.
7	Who has access to your data For the most part, your data will remain within the school and will be processed by appropriate individuals in accordance with our policies. Particularly strict rules of access apply to medical records and safeguarding files.
8	How long we keep personal data For as long as we need it to educate and look after you. We will keep some information after you have left school. In exceptional circumstances, we may keep your information for a longer time than usual, but we would only do so if we had a good reason and we are allowed to do so under data protection law.
9	Your rights, requests and security If the information we hold about you is incorrect, you can ask us to correct it. You can ask us to send you or another organisation certain types of information. You can ask what information we hold about you and get a copy. We take appropriate steps to ensure the security of personal data.
Need more information? Speak to your form tutor, or ask your parents to speak to the school on your behalf.	
If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office ico.org.uk	