

2.11 FARLEIGH SCHOOL – PRIVACY NOTICE FOR GOVERNORS; SUPPLIERS, PROVIDERS AND CONTRACTORS; CONSULTANTS; CUSTOMERS AND WEBSITE USERS

Person(s) responsible:	Information Management Officer
Last updated:	September 2019
Review period:	12 months (or sooner if regulations change)
Next review:	September 2020

At Farleigh School, we are committed to protecting and respecting your privacy.

We ask that you read this Privacy Notice carefully as it contains important information on who we are, how and why we collect, store, use and share ("process") personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

By 'personal information', we mean information which relates to you as an individual and tells us something about you. It does not include information relating to organisations.

1 Who we are

Farleigh School Trust Limited (referred to as "Farleigh School") is an Independent School, company number 00905522, registered charity number 1157842, registered office: Farleigh School, Red Rice, Andover, Hampshire, SP11 7PW.

2 Responsibility for data protection at Farleigh School

Farleigh School collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the [General Data Protection Regulation](#) which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

3 The personal information we collect and use

The personal information we collect, and the use we make of it, varies depending on our relationship with you. For that reason, this privacy notice distinguishes between our Governors, Providers/Suppliers, contractors, consultants and website users.

Please be sure to read the sections of the privacy notice which relate to you.

4 Governors, Trustees and Members of Farleigh School

4.1 Personal information we collect about you includes:

- 4.1.1 Your name, contact details (phone, fax, telephone, email and address);
- 4.1.2 Characteristics information, such as gender, age, ethnic group, sex, religion and marital status (for the purpose of equal opportunities monitoring)
- 4.1.3 Personal information regarding your skills, qualifications and experience (where relevant, including any relevant employment history and/or training courses attended);
- 4.1.4 Details relating to your eligibility to be a Director/Governor, including that you are not disqualified or prevented from acting in this capacity/role;

- 4.1.5 Details relating to any conflicts of interest, including: any relevant material business or pecuniary interests; any governance roles in other educational institutions; and/or material interests arising from close family relationships or with senior employees of Farleigh School;
- 4.1.6 Criminal records information, including the results of an enhanced Disclosure and Barring Service (DBS) check and section 128 checks (as required)
- 4.1.7 Bank details for the purposes of processing any expenses claims made by you in the course of your duties;
- 4.1.8 Information on grievances raised by or involving you;
- 4.1.9 Your image, in photographic and video form, for example in security camera images;
- 4.1.10 Details of your use of business-related social media, such as LinkedIn;
- 4.1.11 Other personal information provided by you.
- 4.2 Farleigh School also puts a photograph and biography information about each Governor on the School website.
- 4.3 How we collect your personal information
 - 4.3.1 We collect personal information about you when you apply to us to be Director/Governor/Trustee or Member of Farleigh School and during any ongoing relationship with the organisation in your role.
 - 4.3.2 Occasionally we may receive information about you from other sources, such as Disclosure and Barring Service (DBS) or the DfE.
- 4.4 How we use your personal information
 - 4.4.1 We use your personal information to assess your suitability for the position of Director/Governor, to communicate with you in relation to that job and to record the administration and governance of Farleigh School. We cannot do this without your personal information.
 - 4.4.2 We may monitor and record communications with you (such as emails) for the purposes of good governance.
- 4.5 Who we share your personal information with
 - 4.5.1 Generally, we will not share your information with anyone outside Farleigh School unless we are legally obliged to do so, for example with the DfE, Companies House, Charity Commission (as may be required).
 - 4.5.2 We will not transfer your personal information outside the UK.
 - 4.5.3 However, we will share personal information with law enforcement or other authorities if required by applicable law.
- 4.6 How long we keep your personal information for

We will keep your personal information in line with any statutory requirements and for a minimum of seven years after you cease to be a Director/Governor/Trustee or Member.
- 4.7 The legal basis on which we collect and use your personal information
 - 4.7.1 We process your personal information on the following legal bases:

- (a) our and your legitimate interests in the administration of Farleigh School as you would reasonably expect and without materially impacting your rights, freedom or interests;
- (b) to comply with a legal obligation; and/or
- (c) performance of a task carried out in the public interest as an education provider.

5 Suppliers, providers and contractors¹

5.1 Personal information we collect about you

- 5.1.1 Your name, contact details (phone, fax, telephone, email and address), employer organisation and job title. Some of this information may be obtained directly from your employer or via its website.
- 5.1.2 Your bank details, tax or VAT number (including information on VAT status) and credit report.

5.2 How we use your personal information

- 5.2.1 We use this information to communicate with you or your employer organisation regarding the provision of goods and services to us.
- 5.2.2 We use your financial information to manage and administer our accounts with you regarding the provision of goods and services to us.
- 5.2.3 We cannot do this without your personal information.
- 5.2.4 Supplier information is used to pay invoices, check the company's VAT status (using VIES http://ec.europa.eu/taxation_customs/vies/) and to check registration at Companies House.

5.3 Who we share your personal information with

- 5.3.1 Generally, we will not share your information with anyone except Farleigh School employees, your employer organisation, site or project managers.
- 5.3.2 We will not transfer your personal information outside the UK.
- 5.3.3 However, we will share personal information with law enforcement or other authorities if required by applicable law.

5.4 How long we keep your personal information for

We keep your personal information for seven years after you cease to be a supplier or contractor of ours.

5.5 The legal basis on which we collect and use your personal information

We process your personal information on the basis that it is necessary to comply with our contractual obligations with you and where it serves our and your legitimate interests to be able to communicate in a way that you would reasonably expect and which does not materially impact your rights, freedoms or interests.

¹ This includes potential suppliers, providers and contractors.

6 Consultants²

6.1 Personal information we collect about you

- 6.1.1 Personal information, such as your name, contact details (address, home and mobile phone numbers, email address) and emergency contacts (name, relationship and home and mobile phone numbers);
- 6.1.2 Characteristics information, such as gender, age, ethnic group, sex, religion and marital status;
- 6.1.3 Information collected during the appointment process and references;
- 6.1.4 Contract information, such as start date, hours worked, post and role;
- 6.1.5 Employment history details;
- 6.1.6 Details of salary and benefits (including expenses), bank/building society, National Insurance and tax information;
- 6.1.7 Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information, including right to work in the UK;
- 6.1.8 Information contained in health reports (including sensitive personal information regarding your physical and mental health);
- 6.1.9 Criminal records information, including the results of Disclosure and Barring Service (DBS) checks and section 128 checks (as required);
- 6.1.10 Information on grievances raised by or involving you;
- 6.1.11 Information on conduct and/or other disciplinary issues involving you;
- 6.1.12 Details of your training records, appraisals and performance reviews;
- 6.1.13 Details of your performance management/improvement plans (if any);
- 6.1.14 Details of your time and attendance records;
- 6.1.15 Details of annual leave or family friendly leave (including sensitive personal information regarding your sex and sexual orientation and physical health);
- 6.1.16 Information regarding your work output and/or performance;
- 6.1.17 Information about your use of our IT, communication and other systems, and other monitoring information;
- 6.1.18 Your image, in photographic and video form, for example in security camera images;
- 6.1.19 Details of your use of business-related social media, such as LinkedIn;
- 6.1.20 Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within our organisation; you will be notified separately if this is to occur); and
- 6.1.21 Details in references about you that we give to others.

6.2 How we use your personal information

² This includes potential consultants.

- 6.2.1 We use this information to communicate with you regarding the provision of services to us.
- 6.2.2 We use your financial information to process the payment of invoices submitted to us by you.
- 6.2.3 We check your VAT status and credit status.
- 6.2.4 We check your right to work in the UK.
- 6.2.5 We cannot do this without your personal information.
- 6.3 Who we share your personal information with
 - 6.3.1 Generally, we will not share your information with anyone except Farleigh School employees, site or project managers.
 - 6.3.2 We will not transfer your personal information outside the UK.
 - 6.3.3 However, we will share personal information with law enforcement or other authorities if required by applicable law.
- 6.4 How long we keep your personal information for

We keep your personal information for seven years after you cease to be a supplier of ours.
- 6.5 The legal basis on which we collect and use your personal information

We process your personal information on the basis that it is necessary to comply with our contractual obligations with you and where it serves our and your legitimate interests to be able to communicate in a way that you would reasonably expect and which does not materially impact your rights, freedoms or interests.
- 7 Customers³**
 - 7.1 We collect data about the customer/organisation that Farleigh School will work with and much of this will not constitute personal data.
 - 7.2 Personal information we collect in this context will relate to the contact person(s) appointed within the customer's organisation to deal with the relationship with Farleigh School, which includes the following:
 - 7.2.1 Personal information, such as your name, contact details (address, mobile phone numbers, email address);
 - 7.2.2 Your role at the organisation;
 - 7.2.3 Pupil name and class name (if relevant to our agreement with you);
 - 7.2.4 Pupil contextual data and attainment details (if relevant to our agreement with you);

All personal data will be processed in line with Farleigh School's duties under data protection legislation.
 - 7.3 How we use your personal information
 - 7.3.1 We will use the information gathered to fulfil the terms of our contract with your organisation.

³ This includes potential Farleigh School customers

7.4 Who we share your personal information with

7.4.1 Generally, we will not share your personal information outside of Farleigh School.

7.4.2 We will not transfer your personal information outside the UK.

7.4.3 However, we will share personal information with law enforcement or other authorities if required by applicable law.

7.5 How long we keep your personal information for

7.5.1 We retain contract and financial information for seven years after the end of the contract and in line with our data retention policy.

7.6 The legal basis on which we collect and use your personal information

7.6.1 We process your personal information on the basis that it is necessary to comply with our contractual obligations with you and where it serves our and your legitimate interests to be able to communicate in a way that you would reasonably expect and which does not materially impact your rights, freedoms or interests.

8 Job applicants

8.1 Personal information we collect about you

8.1.1 Your name, contact details (mobile phone, fax, telephone, email and address);

8.1.2 Details contained in your curriculum vitae, qualifications and references;

8.1.3 Other personal information provided by you;

8.1.4 Disclosure and Barring Service information.

8.2 How we use your personal information

8.2.1 We use your personal information to assess your suitability for a job and contact you in relation to that job.

8.3 Who we share your personal information with

8.3.1 When necessary, we will share your personal information with your employment agency.

8.3.2 Generally, we will not share your information with anyone outside Farleigh School or outside the UK.

8.3.3 However, we will share personal information with law enforcement or other authorities if required by applicable law.

8.4 Whether information has to be provided by you, and if so why

8.4.1 The provision of your name, contact details, CV, qualifications and references are necessary for us to assess your suitability for the particular job. We cannot do this without this personal information. We will inform you if the provision of any additional information is mandatory.

8.5 How long we keep your personal information for

8.5.1 We will keep your personal information for 6 months from the date of rejection for a job role or, if you are accepted for a job role, in accordance with our Privacy Notice for Staff. We may keep your personal information for longer

than 6 months if asked to do so by you so that we can contact you in relation to other suitable job roles that may arise from time to time.

8.6 The legal basis on which we collect and use your personal information

8.6.1 We process your personal information on the basis of our and your legitimate interests as well as entering into a contract of employment to consider your job application as you would reasonably expect and without materially impacting your rights, freedom or interests.

9 Website users

9.1 Personal information we collect about you

9.1.1 Your name, email, address and other details you may choose to provide when you register or make an enquiry via our website. We also collect personal information when you post material to our website.

9.2 How we use your personal information

9.2.1 We use this information to identify and communicate with you; to

9.2.2 Process your enquiry or request; and to

9.2.3 Notify you of any changes to our website that may affect you.

We cannot do this without your personal information.

9.3 Who we share your personal information with

9.3.1 Generally, we will not share your information with anyone outside of Farleigh School.

9.3.2 We will not transfer your personal information outside the UK.

9.3.3 However, we will share personal information with law enforcement or other authorities if required by applicable law.

9.4 How long we keep your personal information for

9.4.1 We keep your personal information in line with the Farleigh School retention of records policy. A copy can be provided on request.

9.5 The legal basis on which we collect and use your personal information

9.5.1 We process your personal information on the following legal bases:

(a) our and your legitimate interests in the administration of Farleigh School as you would reasonably expect and without materially impacting your rights, freedom or interests;

(b) to comply with a legal obligation; and/or

(c) performance of a task carried out in the public interest as an education provider.

10 Consequences of our use of your personal information

Our processing of your personal information allows us to decide whether or not to enter into a contract with you, to perform that contract and manage it in the interests of our business.

11 Transfer of your information out of the EEA

We do not intend to transfer your information out of the UK or outside of the EEA during the course of our general operations. The data we hold is stored in the UK. In the event that we do need to transfer your data overseas, we will inform you accordingly.

12 Your rights

12.1 Under data protection laws you have a number of important rights free of charge. In summary, those include the right to:

12.1.1 access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address;

12.1.2 require us to correct any mistakes in your information which we hold;

12.1.3 require the erasure of personal information concerning you in certain situations;

12.1.4 receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit that information to a third party in certain situations;

12.1.5 object at any time to processing of personal information concerning you for direct marketing;

12.1.6 object in certain other situations to our continued processing of your personal information; and

12.1.7 otherwise restrict our processing of your personal information in certain circumstances.

12.2 For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

12.3 If you would like to exercise any of those rights, please:

12.3.1 email us at: office@farleighschool.com;

12.3.2 let us have enough information to identify you;

12.3.3 let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and

12.3.4 let us know the information to which your request relates.

13 Keeping your personal information secure

13.1 We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

13.2 We also have procedures in place to deal with any suspected information security breach. We will notify you and any applicable regulator of a suspected information security breach where we are legally required to do so.

14 Changes to this privacy notice

14.1 This Privacy Notice was first published on 1 September 2018.

14.2 We may change this Privacy Notice from time to time and when we do, a copy of the amended version will be available on the Farleigh School website.

15 **How to complain**

15.1 We hope that we can resolve any query or concern you raise about our use of your information. If you have a concern about the way we are collecting or using your information, we ask that you raise your concern with us in the first instance.

15.2 You also have the right to complain to the UK Information Commissioner, who may be contacted at <https://ico.org.uk/concerns/> or by telephone on 0303 123 1113. If you live or work elsewhere in the EU or EEA, you can also complain to your local supervisory authority.

16 **How to contact us**

16.1 Please contact us if you have any questions about this privacy notice or the information we hold about you.

16.2 If you wish to contact us please:

16.2.1 send an email to office@farleighschool.com; or

16.2.2 write to Farleigh School, Red Rice, Andover, SP11 7PW; or

16.2.3 call 01264 710766.

17 **Do you need extra help?**

17.1 If you would like this notice in another format (for example: audio, large print, braille) please contact us (see 'How to contact us' above).