PRIVACY NOTICE

SCOPE

This policy applies to John Lyon School, which comprises the 'Senior School' and the 'Prep School'. All references to 'the School' refer to John Lyon School except where otherwise specified.

INTRODUCTION

This Privacy Notice is intended to provide information about how Senior and Prep School will use (or "process") personal data about individuals including: its staff; 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 Policy defines how the School will meet its obligations with regards to personal data, as required by the **UK General Data Protection Regulation** (the 'UK GDPR') **Data Protection Act 2018** (the 'Act'), and the **Data (Use and Access) Act** 2025 (DUAA) (together "Data Protection Law"). This Privacy Notice applies alongside any other information the School may provide about a particular use of personal data, for example when collecting data online or in paper form.

This Privacy Notice applies to:

- Prospective Pupils and their Parents who have applied for entry to the School;
- Current Pupils;
- Former Pupils;
- Parents of Current and Former Pupils;
- Prospective, Current and Former members of Staff;
- Service providers, working for or on behalf of the School, and suppliers.

Anyone who works for, or acts on behalf of, the School (including staff, volunteers, governors and service providers and suppliers) should also be aware of and comply with this Privacy Notice and other policies regarding Data Protection, which also provide further information about how personal data about those individuals will be used.

1. OUR CONTACT INFORMATION

This Privacy Notice is provided under theData Protection Law on behalf of The John Lyon School, Middle Road, Harrow on the Hill, HA2 0HN (Registered Charity Number 310033), and serves to inform all those on whom we hold or process data.

The School is a Data Controller and is responsible for determining how personal data is processed and for what purpose.

The School has appointed the Bursar as the person responsible for managing how we look after personal data and deciding how it is shared. The Bursar will respond to all your requests and

enquiries concerning the School's use of your personal data and endeavour to ensure that all personal data is processed in compliance with this Privacy Notice, the School's Data Protection Policy and data protection law.

2. PERSONAL DATA

We currently collect and process personal data. 'Personal data' means information which relates to a living person who can be identified from that data (a 'data subject') on its own, or when taken together with other information which is likely to come into our possession. It includes any expression of opinion about the person and an indication of the intentions of us or others, in respect of that person.

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.

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). Nevertheless, 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.

Personal data that we collect directly from you or from third parties

Examples of personal data that we process include, but are not limited to:

- names, addresses, telephone numbers, email addresses and other contact details;
- car details (about those who use our car parking facilities or who park in the local area);
- bank details and other financial information, e.g. about Parents who pay fees to the School including any anti-money laundering information we may collect in the course of verifying fee payments.
- In some cases, we obtain information about you from third parties such as credit reference agencies and solicitors or from your child's previous school(s).;
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- personnel files, including in connection with academic records, employment or safeguarding;
- 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; and
- 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 Photographic Images and Videos Policy and CCTV Policy on taking, storing and using images of children);

In addition, the School will on occasion need to process **special category personal data** (concerning health, gender, ethnicity, religion, biometrics or sexual orientation) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including those relating to safeguarding and employment, or from time to time 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 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 the 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 (SEN) of a pupil;
- To provide the appropriate community support in the context of any religious beliefs;
- In connection with employment of its staff, for example DBS checks, welfare, union membership or pension plans;
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are special educational needs, health or safeguarding elements;
- 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; or
- Court orders or criminal petitions.

3. THE LAWFUL BASIS FOR PERSONAL AND SENSITIVE INFORMATION

3.1 For Personal Information

Some of the School's activities will need to be carried out 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.

Note: the DUAA 2025 introduces a new "recognised legitimate interests" lawful basis (Art. 6(1)(ea) UK GDPR) for specific purposes including crime prevention, safeguarding and emergency response, where no balancing test is required.

Under Data Protection Law, the lawful bases we rely on for processing this information are:

Your consent
By accessing or using the School Site and the services, you agree and consent to the collection, transfer, use, storage, disclosure and sharing of your information as described and collected by us in accordance with this policy. If you do not agree with the policy, please do not use or access the School's Website.

If you do not provide the information the School requires, it may not be able to provide all of its services to you. If you do not agree with the policy, please do not use or access Schools' Websites.

We may ask for your consent to use your information in certain ways i.e. to process special category data. If you wish to remove your consent at any time you should contact the School's Privacy Officer at DataProtection@johnlyon.org.

The School's contractual obligation
We have a contract with Parents to educate and look after the pupils. We are allowed to use information about you where this is necessary under that agreement.

The School's legal obligation
The processing is necessary in accordance with the relevant lawful bases for the School to undertake its obligations to pupils, their parents or guardians, or staff.

We may also need to use your information in connection with legal disputes.

The School has a vital interest
We are allowed to use your information in an emergency, for example if a pupil requires urgent medical attention.

The School needs it to perform a public task
We also use your information to provide education to pupils which is in the public interest.

The School has a legitimate interest
The School expects that the following uses will fall within the category of its "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;
- For the purposes of bursary awards;
- To maintain relationships with alumni and the 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;
- 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 ICT Acceptable Use Policies;
- To make use of photographic images of current and former pupils, staff, parents, visiting pupils and visitors in school publications, on the School website and (where appropriate) on the School's social media channels in accordance with the School's Photographic Images and Videos Policy;
- For security purposes, including CCTV in accordance with the School's CCTV Policy;
- To enable the processing and paying of invoices from service providers and suppliers;
- 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.

4. DATA SGHARING WITH THIRD PARTIES

Non-compliance with this policy, where an approved dispensation is not in place, must be reported to the Privacy Officer at DataProtection@johnlyon.org.

Any member of the staff not complying with this policy may be subject to disciplinary action.

4.1 Related Documents

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 the police or the local authority);
- appropriate regulatory bodies (e.g. TRA, the Independent Schools Inspectorate, the Charity Commission or the Information Commissioner);
- The **John Lyon Foundation** (comprising the **John Lyon Corporation** and the **John Lyon Charity** (registered charity number 237725));
- The **John Lyon Corporation** (The Keepers and Governors of the Possessions, Revenues and Goods of the Free Grammar School of John Lyon, within the town of Harrow-on-the-Hill (registered charity number 310033), comprising **Harrow School** and **John Lyon School**, and with subsidiaries the **Harrow International Schools Limited** (HISL) and **Harrow School Enterprises Limited** (HSEL)); and
- **Harrow School** where administrative functions are shared with the John Lyon School.

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

- medical records, held and accessed only by the appropriate medical staff or under their supervision, or otherwise in accordance with express consent; and pastoral or safeguarding files
- However, certain relevant information about pupils with special educational needs will be provided to staff to ensure that the pupils receive the necessary care and education.

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 in accordance with data protection law and always subject to contractual assurances that personal data will be kept securely and only in accordance with the School's specific directions.

Data sharing with third parties is carried out under a written agreement, setting out the scope and limits of the sharing in accordance with the principles of the Data Protection Law. Any disclosure of personal data will be in compliance with approved procedures.

4.2 Data Sharing Overseas

We may share the information overseas for the purpose of storing that information on overseas computer servers or for communications with pupils who are overseas. Where the School transfers personal data outside of the United Kingdom, it will do so using the appropriate transfer mechanisms, ensuring the necessary protections are in place for the security of personal data.

5. HOW LONG WE KEEP YOUR INFORMATION

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 pupil files is up to 7 (seven) years following departure from the School aged 18, and therefore the School takes this to be the end of the academic year in which the former pupil turns 25 (twenty-five) years of age. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements. Staff files are kept in perpetuity.

If you are a Parent, current pupil or member of staff and you have any specific queries about how our retention schedule is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Privacy Officer (DataProtection@johnlyon.org).

If you are a former pupil, former member of staff or a governor and you have any specific queries about how our retention schedule is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact the Privacy Officer (DataProtection@johnlyon.org).

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 to fulfil your wishes (called a "suppression record").

6. HOW WE KEEP YOUR INFORMATION SECURE

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 Privacy Officer (DataProtection@johnlyon.org) 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 whom 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 these policies and their duties under data protection law and receive relevant training.

8 YOUR DATA PROTECTION RIGHTS

Under data protection law, you have rights including:

Your right of access - you have the right to ask us for copies of your personal information.

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 that 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 that 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).

The School is also not required to disclose any pupil examination scripts (or other information consisting solely of pupil test answers), nor provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the School itself for the purposes of the education, training 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 legitimate interest identified in this PN. All such requests will be considered on their own merits.

Your right to rectification - you have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - you have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - you have the right to ask us to restrict the processing of your personal information where we are relying on a legitimate interest to do so and you think

that your rights and interests outweigh our own and you wish us to stop, or when we process your personal data for the purposes of direct marketing.

Your right to object to processing - you have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - you have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have 1 (one) month to respond to you. Where the School requires additional information to verify your identity or clarify your request, the response period will be paused until that information is received.

8.1 Pupil Requests

Pupils can make Subject Access Requests (requests to access data held about them) 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 to make a subject access request on their 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.

Pupils in Year 9 (nine) 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. In some cases, slightly younger children may be deemed by the School to be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

8.2 Parental Requests, Etc

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.

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.

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.

9 QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to the Privacy Officer (DataProtection@johnlyon.org). If an individual believes that the School has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the School's Complaints Procedure for Parents and should also notify the Head, Mrs Rose Hardy (Head@johnlyon.org).

Under the DUAA (s.103, in force 19 June 2026), you also have a statutory data protection right to complain directly to the School about how your personal data has been handled. The School must acknowledge your complaint within 30 days and respond without undue delay.

If you are dissatisfied with the outcome of your compliant, you then have the right to escalate it to the Information Commission. The ICO's address is:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
SK9 5AF

Helpline number: 0303 123 1113
ICO website: https://www.ico.org.uk

If you wish to exercise your rights, please speak to the School's Privacy Officer at DataProtection@johnlyon.org

9.1 Changes to 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.

10 SUPPORTING POLICIES, PROCEDURES AND GUIDANCE

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

- the Parent Contract;
- the School's Data Protection Policy;
- the School's Photographic Images and Videos Policy;
- the School's CCTV Policy;
- the School's Data Asset Register, which informs the retention of records;
- the School's Safeguarding and Child Protection Policy, Health and Safety Policies, and other procedures regarding how concerns or incidents are recorded; and
- the School's suite of ICT Policies, including its Pupil, Staff and Visitor Acceptable Use Policies, Online Safety Policy, and Personal Data Handling within the Data Protection Policy.

Reviewed by: Bursar
Implemented: September 2026
Next Review: September 2027