



## Privacy Notice for Older Pupils

### How We Use Your Information

**Priory School Edgbaston**

June 2018

## Pupil Privacy Notice - Key Information

This notice contains the key information about **how** and **why** we collect your personal information and **what** we do with that information.

Personal information is information that identifies you and relates to you. For example, information about how well you are doing at School and any information that we need to take care of you. Photographs and videos of you also count as your personal information.

We encourage you to read the full version of our pupil privacy notice which is published on the School's website and can be found here [[• please insert the URL of the relevant section of the website](#)]. You can also obtain a copy of the full privacy notice by [[• asking your parents to contact the School or by speaking to your form tutor](#)].

The full version includes additional points, such as:

- the rights you have in your information including what decisions you can make about your information;
- for how long the School retains your personal information; and
- our legal bases for using your personal information.

Our primary reason for using your personal information is to provide you with an education.

We set out below examples of the different ways in which we use your personal information and where that personal information comes from.

- Admissions forms give us lots of personal information. We get information from you, your parents, your teachers and other pupils. Your old school also gives us information about you so that we can teach and care for you.
- Sometimes we get information from your doctors and other professionals where we need this to look after you.
- We may need to report some of your information to the government (e.g. the Department for Education). We will need to tell the local authority that you attend the School, if you leave the School or let them know if we have any concerns about your welfare.
- We will share your academic and (where fair) your behaviour records with your parents [[• or education guardian](#)] so they can support your schooling.
- We may use photographs or videos of you for the School's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the School. We may continue to use these photographs and videos after you have left the School. Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.
- We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing.
- We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms.

- We will send you information to keep you up to date with what is happening at the School. For example, by sending you information about events and activities taking place (including fundraising events) and the School newsletter.
- We will keep details of your address when you leave so we can send you [• the insert alumni magazine name] and find out how you are getting on. [• We may also pass your details onto the alumni organisation which is called [• please complete]. Further information on the alumni association can be found here [• insert link]].

You have the following rights regarding your information:

- Rectification of information held;
- Access to information held;
- Deletion of information in certain circumstances;
- Portability - the transfer of information to you or a third party;
- Restriction of use of information; and
- The right to object to the use of information in certain circumstances.

These rights are explained in more detail in the full privacy notice, and [the Data Protection Officer / School Business Manager] can give you more information.

If you have any questions about how we use your personal information, please speak to your form tutor]. Alternatively, you can speak to your parents who will speak to us on your behalf.

## **Introduction**

This notice is to help you understand **how** and **why** we collect your personal information and **what** we do with that information. It also explains the decisions that you can make about your own information.

If you have any questions about this notice, please talk to your form tutor.

## **What is "personal information"?**

Personal information is information that the School holds about you and which identifies you.

This includes information such as your name, date of birth and address as well as things like exam results, medical details, unique pupil number and behaviour records. We will also hold information such as your religion or ethnic group for the purposes of seeking to ensure that the School can meet the needs of a diverse group. CCTV, photos and video recordings of you are also personal information.

## **Our legal grounds for using your information**

This section contains information about the legal grounds that we are relying on when handling your information.

The two tables below contain a general description of the different legal bases but we have also used a colour code system so that you can see which bases we are relying on for each of the purposes described at paragraphs 1 to 40 below.

### Legitimate interests ("LI")

This means that the School is using your information when this is necessary for the School's legitimate interests or someone else's legitimate interests. We won't rely on this ground when your interests and fundamental rights override our legitimate interests. Specifically, the School has a legitimate interest in:

- Providing you with an education and making sure that you are behaving properly.
- Complying with our agreement with your parents for you to be at the School.
- Looking after you, your classmates and our staff (e.g. your teachers).
- Keeping the school buildings safe.
- Making sure that the School is well managed and that we protect the School's reputation.
- Telling people about the School and what we do here e.g. we may use photographs of you in our prospectus, on our website or in our social media.
- Ensuring that all relevant legal obligations of the School are complied with (for example in relation to inspections).
- Using your information in connection with legal disputes.
- Improving the School e.g. if we want to raise money to build new buildings or to make sure that we are providing you and your classmates with a good schooling experience.

In addition your personal information may be processed for the legitimate interests of others. For example, we may use information about you when investigating a complaint made by one of your fellow pupils.

### Legal obligation ("LO")

The School might need to use your information in order to comply with a legal obligation, for example, to report a concern about your wellbeing to Children's Services. We will also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

### Vital interests ("VI")

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

### Performance of a task carried out in the public interest (or carrying out public tasks) ("PI")

This applies where what we are doing is for the benefit of people generally. The following are examples of where this applies:

- providing you and others with an education;
- safeguarding and promoting your welfare and the welfare of your classmates;
- facilitating the efficient operation of the School; and
- ensuring that we comply with all of our legal obligations.

The School must also comply with an additional condition where it processes special categories of personal information. These special categories include: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information, and information about sex life or orientation. Trade union membership (e.g. if you are a member because of an apprenticeship) is also a special category of personal information.

### Substantial public interest ("SPI")

The School is allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This is similar to "public interest" in the table above. For example, the School will use information about your health to look after you. We may also use other types of special category personal data about you to provide you with an education, to look after you and your classmates or when the School is inspected.

### Employment and social protection and social security law ("ESP")

There will be times when the School needs to use your information because we are an employer (e.g. we employ your teachers). Also the School will use your information to comply with social protection law (e.g. to look after you) and social security laws. Social protection law is concerned with preventing, managing, and overcoming situations that adversely affect people's wellbeing.

### Vital interests:

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

### Legal claims: ("LC")

We are allowed to use your information if this is necessary in relation to legal claims. For example, this allows us to share information with our legal advisors and insurers. This applies whenever sharing special category data is necessary in relation to legal claims.

### Medical purposes ("MP")

This includes medical treatment and the management of healthcare services.

## How and why does the School collect and use your personal information?

We set out below different ways in which we use personal information and where this personal information comes from. The letters highlighted in different colours below refer to the legal bases we are relying on. Please see the section above for an explanation.

1. The School's primary reason for using your personal information is to provide you with an education - LI, PI, SPI.
2. The School will also use your personal information to safeguard and promote your welfare and the welfare of others (for example, so that we can look after you if you are hurt) - LI, PI, SPI, ESP, MP.

Admissions forms give us lots of personal information about you such as your name, contact details, disabilities, any particular difficulties you have with work, hobbies and interests, medical information (such as information about an allergy) and family circumstances. We get information from you, your parents, your teachers and other pupils. Your old school also gives us information about how well you did and any difficulties you had so that we can teach and care for you.

Sometimes we get information from your doctors and other professionals where we need this to look after you.

3. We will use information about you during the admissions process e.g. [• when marking your entrance exams and learning more about you from your parents before you join the School]. We may let your old school know if you have been offered a place at the School - LI, PI, SPI.

4. We need to tell the appropriate teachers if you have a health issue - LI, PI, SPI.
5. We will need to tell your teachers if you have special educational needs or need extra help with some tasks - LI, PI, SPI.
6. We will need to share information about you (e.g. about your health and wellbeing) with the [• School doctor or counsellor] - LI, PI, SPI, ESP, MP.
7. If we have information that you suffer from an allergy we will use this information so that we can look after you - LI, PI, SPI, VI, MP.
8. If we have information that you suffer from a disability we will use information about that disability to provide support - LI, PI, SPI, ESP and in certain circumstances, MP.
9. Where appropriate, the School will have information about your religious beliefs and practices. For example, if you do not eat certain foods - LI, PI, SPI.
10. We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms - LI, PI, SPI.
11. We will be told if you receive free school meals so that we can provide these - LI, PI, SPI.
12. We record your attendance and if you have time away from the School we record the reason(s) why - LI, PI, SPI.
13. We will need to report some of your information to the government (e.g. the Department for Education). We will need to tell the local authority that you attend the School, if you leave the School or let them know if we have any concerns about your welfare - LI, LO, PI, SPI, ESP.
14. We are legally required to provide the Department for Education with certain information about you and your classmates. Some of this information will be stored on the National Pupil Database. Organisations can request information from the National Pupil Database which includes information about you. But they are only allowed to do this for limited purposes and they must be very careful about how they use your information. More information can be found here - <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information> - LO, SPI.
15. We may need to share information about you with the Health and Safety Executive (a government organisation) if there is a health and safety issue at the School - LI, LO, PI, SPI.
16. The School is a charity which means that we may need to share your information with the Charity Commission which checks how we are behaving as a charity - LI, LO, PI, SPI.
17. We will need information about any court orders or criminal matters which relate to you. This is so that we can safeguard your welfare and wellbeing and the other pupils at the School - LI, PI, SPI.
18. [• If you are from another country we have to make sure that you have the right to study in the UK. Sometimes the government will ask us to provide information as part of our reporting requirements. In addition to this we have a duty to provide

information about you to UK Visas and Immigration who are part of the government - LI, LO, PI, SPI.

19. Depending on where you will go when you leave us we will provide your information to [• other schools, colleges and universities, UCAS or potential employers]. For example, we will share information about your exam results and provide references - LI, PI, SPI.
20. We may pass on information to your next school which they need to look after you, for example, information about any concerns we have had about your welfare - LI, LO, PI, SPI, ESP.
21. When you take public examinations (e.g. GCSEs) we will need to share information about you with examination boards. For example, if you require extra time in your exams LI, PI, SPI.
22. The Learning Records Service (which is part of the government) will give us your unique learning number. We may receive details about you (e.g. your qualifications) from the Learning Records Service - LI, PI, SPI.
23. We may provide your information to the local authority so that they can provide careers advice. We may also share your information with the provider of youth support services - LI, PI, SPI.
24. The School is sometimes inspected to make sure that we are continuing to be a good school. We will have to make your information available to the inspectors to help them to carry out their job - LI, LO, PI, SPI.
25. If someone makes a complaint about how the School has behaved, we may need to use your information to deal with this appropriately. For example, if your parents complain that we have not looked after you properly - LI, PI, SPI.
26. The School may share information about you with the local authority for the purpose of the preparation, implementation and / or review of your Statement of Special Educational Needs or Education Health and Care Plan - LI, PI, LO.
27. We may need to share information about you with the police or our legal advisers if something goes wrong or to help with an enquiry. For example, if one of your classmates is injured at School or if there is a burglary - LI, LO, PI, SPI, LC.
28. We use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We will share your information with them if this is relevant to their work - LI, PI, SPI.
29. If you have misbehaved in a serious way, we may need to share information with the police and we may need to use information about the action taken by the police.
30. We may share some information with our insurance company to make sure that we have the insurance cover that we need - LI, LO, PI, SPI, ESP.
31. Parents who are based outside of the UK will sometimes appoint someone to act on their behalf during the admissions process (an overseas agent). If this applies to you, your parents may provide information to the overseas agent so that he or she can pass this on to the School. We will sometimes share information with the overseas agent, for example, we may send them the letter telling your parents that we are offering you a place so that they can pass this on to your parents - LI.



32. We will share your academic and (where fair) your behaviour records with your parents or education guardian so they can support your schooling - LI, PI, SPI.
33. We will monitor your use of email, the internet and mobile electronic devices e.g. iPads. This monitoring is sometimes carried out using computer software. In certain circumstances we will look at the content of your communications (e.g. emails and text messages). We monitor and look at your use of technology (e.g. your use of your phone) to check that you and your classmates are not misbehaving, at risk of harm or for other good reasons. If you would like more information about this you can read the acceptable use of IT and email policy or speak to your form tutor - LI, PI, SPI.
34. We may use photographs or videos of you for the School's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the School. We may continue to use these photographs and videos after you have left the School - LI.
35. Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson - LI.
- If you have concerns about us using photographs or videos of you please speak to your form tutor.
36. We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing - LI.
37. We will keep details of your address when you leave so we can send you School publications and find out how you are getting on. We may also pass your details onto the alumni organisation (The Priory and HCS Alumni Network). Further information on the alumni association can be found on the School Website - LI.
38. The School must make sure that our computer network is working well and is secure. This may involve information about you, for example, our anti-virus software might scan files containing information about you - LI.
39. [• From time to time, we may use a third party to provide activities such as an external sports coach. We may share your information with them, for example, to tell them what sports you are good at- LI, PI
40. We can keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the School - LI.

We will only share your information with other people and organisations when we have a good reason to do so. In exceptional circumstances we may need to share it more widely than we would normally.

We sometimes use contractors to handle personal information on our behalf. The following are examples:

- a. • IT consultants who might access information about you when checking the security of our IT network]; and
- b. • we use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the School site].

If you have any questions about any of the above, please speak to your form tutor.

### **Criminal offence information**

In exceptional circumstances, we may use information about criminal convictions or offences. We will only do this where the law allows us to. This will usually be where such processing is necessary to carry out our obligations and to look after our pupils.

### **More than one basis**

As you will see from the information above, in some cases we will rely on more than one ground for a particular use of your information. In addition, we may move from one of the legal bases listed above to another as circumstances change. For example, if we become really worried about your wellbeing, we may start to rely on "legal obligation" to share personal information with the local authority in addition to the other legal bases which are noted for looking after you.

### **Consent**

We may ask for your consent to use your information in certain ways as an alternative to relying on any of the bases in the table above. For example, we may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on legitimate interests. If we ask for your consent to use your personal information you can take back this consent at any time.

Any use of your information before you withdraw your consent remains valid. Please speak to [your form tutor if you would like to withdraw any consent that you have given.

### **Sending information to other countries**

We may send your information to countries which do not have the same level of protection for personal information as there is in the UK. For example, we may [• store your information on cloud computer storage based overseas].

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: [v https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)

If the country that we are sending your information to is not on the list or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland) then it might not have the same level of protection for personal information as there is in the UK.

We will provide you with details about the safeguards which we have in place outside of this privacy notice. If you have any questions about the safeguards that are in place please contact your form tutor.

### **For how long do we keep your information?**

We keep your information for as long as we need to in order to educate and look after you. We will keep some information after you have left the School, for example, so that we can find out what happened if you make a complaint.

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 only if we are allowed to do so under data protection law.

Please see our Record Keeping and Archive Policy for more detailed information. This can be found on the School website.

## What decisions can you make about your information?

From 25 May 2018 you will be able to make various decisions about your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

- **Rectification:** if information the School holds about you is incorrect you can ask us to correct it.
- **Access:** you can also ask what information we hold about you and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to.
- **Deletion:** you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your information to you or to a third party in a format that can be read by computer in certain circumstances.
- **Restriction:** our use of information about you may be restricted to simply storing it in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.
- **Object:** you may object to us using your information where:
  - we are using it for direct marketing purposes (e.g. to send you School publications;
  - the legal basis on which we are relying is either legitimate interests or performance of a task carried out in the public interest. Please see the section "Our legal bases for using your information" above;
  - we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of your class for historical reasons.

## Further information and guidance

This notice is to explain how we look after your personal information. Please speak to your form tutor if:

- you would like to exercise any of your rights listed above;
- you would like us to update the information we hold about you; or
- you would prefer that certain information is kept confidential.

If you have any concerns about how we use your personal information, please speak to your form tutor in the first instance. Alternatively, you can ask your parents to speak to us on your behalf if you prefer.

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](https://ico.org.uk).

# **How We Use Your Child's Information**

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## **Privacy Notice for Younger Pupils**

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**Independent Day School for Boys and Girls**

**Priory School Edgbaston**

May 2018

Claire Hall  
Email: [chall@vww.co.uk](mailto:chall@vww.co.uk)  
DDI: 0117 314 5279  
Reference: CEAH 2PL25 0019



## Pupil Privacy Notice for parents of younger pupils - Key Information

This notice contains the key information about how and why we collect your child's personal information and what we do with that information.

Personal information is information that identifies your child as an individual and relates to your child. For example, information about how well your child is doing at School and any information that we need to take care of your child. Photographs and videos of your child also count as their personal information.

We encourage you to read the full version of our pupil privacy notice which is available on request from the School via [headmaster@prioryschool.net](mailto:headmaster@prioryschool.net).

The full version includes additional points, such as:

- the rights your child has in their information including what decisions you can make about your child's information;
- for how long the School retains your child's personal information; and
- our legal bases for using your child's personal information.

Our primary reason for using your child's personal information is to provide them with an education.

We set out below examples of the different ways in which we use your child's personal information and where that personal information comes from.

- Admissions forms give us lots of personal information about your child. We get information from you, your child's teachers and other pupils. Your child's old school also gives us information about your child so that we can teach and care for your child.
- Sometimes we get information from your child's doctors and other professionals where we need this to look after your child.
- We may need to report some of your child's information to the government (e.g. the Department for Education). We will need to tell the local authority that your child attends the School, if your child leaves the School or let them know if we have any concerns about your child's welfare.
- We may use photographs or videos of your child for the School's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the School. We may continue to use these photographs and videos after your child has left the School.
- Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.
- We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing.

- We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms.
- We will keep details of your child's address when they leave so we can send them School publications and find out how they are getting on. We may also pass their details onto the alumni organisation (The Priory and HCS Alumni Network). Further information on the alumni association can be found on this website.

You have the following rights regarding your child's information:

- Rectification of information held;
- Access to information held;
- Deletion of information in certain circumstances;
- Portability - the transfer of information to you or a third party;
- Restriction of use of information; and
- The right to object to the use of information in certain circumstances.

These rights are explained in more detail in the full privacy notice, and further information can be obtained via [headmaster@prioryschool.net](mailto:headmaster@prioryschool.net).

## Introduction

This notice is to help you understand **how** and **why** we collect your child's personal information and **what** we do with that information. It also explains the decisions that you can make about your child's information.

We are giving you this notice because you are able to exercise your child's data protection rights on their behalf. When your child is older (usually when they reach the age of 12) they will be considered mature enough to exercise their own data protection rights.

If you have any questions about this notice please talk to [• the Headmaster].

## What is "personal information"?

Personal information is information that the School holds about your child and which identifies your child.

This includes information such as their date of birth and address as well as things like exam results, medical details and behaviour records. [• We will also hold information such as [• your child's religion or ethnic group for the purposes of [• please complete]]. CCTV, photos and video recordings of your child are also personal information.

## Our legal bases for using your child's information

This section contains information about the legal basis that we are relying on when handling your child's information as described above.

The two tables below contain a general description of the different legal bases but we have also used a colour code system so that you can see which bases we are relying on for each of the purposes described at paragraphs 1 to 38 below.

### Legitimate interests ("LI")

This means that the School is using your child's information when this is necessary for the School's legitimate interests or someone else's legitimate interests. We won't rely on this basis when your child's interests and fundamental rights override our legitimate interests. Specifically, the School has a legitimate interest in:

- Providing your child (and other children) with an education and making sure that your child is behaving properly.
- Complying with our agreement with you for your child to be at the School.
- Keeping the school buildings safe.
- Making sure that the School is well managed and that we protect the School's reputation.
- Safeguarding and promoting your child's welfare and the welfare of other children.
- Promoting the objects and interests of the School. This includes fundraising e.g. if we want to raise money to [• build new buildings] and using photographs of your child in promotional material such as on our website and in the prospectus.
- Ensuring that all relevant legal obligations of the School are complied with (for example in relation to inspections).
- Using your child's information in connection with legal disputes.
- Facilitating the efficient operation of the School.

In addition your child's personal information may be processed for the legitimate interests of others. For example, we may use information about your child when investigating a complaint made by another pupil.

### Legal obligation ("LO")

Where the School needs to use your child's information in order to comply with a legal obligation, for example to report a concern about your wellbeing to Children's Services. We will also have to disclose your child's information to third parties such as the courts, the local authority or the police where legally obliged to do so.

### Vital interests

In limited circumstances we may use your child's information to protect your child's vital interests or the vital interests of someone else (e.g. if your child or they are seriously hurt).

### Performance of a task carried out in the public interest (or carrying out public tasks) ("PI")

This applies where what we are doing is for the benefit of people generally. The following are examples of where this applies:

- providing your child and others with an education;
- safeguarding and promoting your child's welfare and the welfare of other children;
- facilitating the efficient operation of the School; and
- ensuring that we comply with all of our legal obligations.

The School must also comply with an additional condition where it processes special categories of personal information. These special categories include: personal



information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information, and information about sex life or orientation.

#### Substantial public interest ("SPI")

The School is allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This is similar to "public interest" in the table above. For example the School will use information about your child's health to look after him / her. We may also use other types of special category personal data about your child to provide them with an education, to look after your child and their classmates or when the School is inspected.

#### Employment and social protection and social security law ("ESP")

There will be times when the School needs to use your child's information because we are an employer. Also the School will use your child's information to comply with social protection law (e.g. to look after your child) and social security laws. Social protection law is concerned with preventing, managing, and overcoming situations that adversely affect people's wellbeing.

#### Vital interests

In limited circumstances we may use your child's information to protect your child's vital interests or the vital interests of someone else (e.g. if your child or they are seriously hurt).

#### Legal claims ("LC")

The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers. This applies whenever sharing special category data is necessary in relation to legal claims.

#### Medical purposes ("MP")

This includes medical treatment and the management of healthcare services.

## How and why does the School collect and use your child's personal information?

We set out below examples of the different ways in which we use personal information and where this personal information comes from.

1. Our primary reason for using your child's information is to provide your child with an education - LI, PI, SPI.
2. The School will also use your child's personal information to safeguard and promote your child's welfare and the welfare of others (for example, so that we can look after your child if they are hurt) - LI, PI, SPI, ESP, MP.

The admissions forms which you complete give us personal information about your child. We get information from your child, his / her teachers and other pupils. Your child's old school also gives us information about how well your child did and any difficulties they had if we need this to teach and care for them.

Sometimes we get information from your child's doctor and other professionals where we need this to look after your child.

3. We will use information about your child during the admissions process e.g. [• when marking entrance exams and considering any information provided on the registration form]. We may let your child's previous school know if they have been offered a place at the School - LI, PI, SPI.

4. We need to tell all appropriate members of staff if your has a health issue - LI, PI, SPI.
5. We will tell your child's teachers if he or she has special educational needs or requires extra help with some tasks - LI, PI, SPI.
6. We will need to share information about your child (e.g. about their health and wellbeing) with the [• School doctor or counsellor] - LI, PI, SPI, ESP, MP.
7. If we have information that your child suffers from an allergy we will use this information so that we can look after your child - LI, PI, SPI, VI, MP.
8. If we have information that your child suffers from a disability we will use information about that disability to provide support - LI, PI, SPI, ESP and in certain circumstances, MP.
9. Where appropriate, the School will have information about your child's religious beliefs and practices. For example, if your child does not eat certain foods - LI, PI, SPI.
10. We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms - LI, PI, SPI.
11. We will be told if your child is eligible to receive free school meals so that we can provide these - LI, PI, SPI.
12. We record your child's attendance and if he or she has time away from the School we record the reason(s) why - LI, PI, SPI.
13. We will need to report some of your child's information to the government (e.g. the Department for Education). We will need to tell the local authority that your child attends the School or let them know if we have any concerns about your child's welfare - LI, LO, PI, SPI, ESP.
14. We may need to share information about your child with the Health and Safety Executive (a government organisation) if there is a health and safety issue at the School - LI, LO, SPI.
15. The School is a charity which means that in exceptional circumstances we may need to share your child's information with the Charity Commission e.g. in the event of a serious incident - LI, LO, PI, SPI.
16. When we are inspected by professional inspecting bodies such as [• the Independent Schools Inspectorate / governors] we will have to make your child's information available to the inspectors to assist them with their inspection - LI, LO, PI, SPI.
17. If the School receives a complaint or grievance which involves your child we will need to use their information to deal with this appropriately. For example, if you make a complaint or if another parent complains about an issue which involves your child - LI, PI, SPI.
18. The School may share information about your child with the local authority for the purpose of the preparation, implementation and / or review of your child's

Statement of Special Educational Needs or Education Health and Care Plan - LI, PI, LO.

19. We are legally required to provide the Department for Education with certain information about your child. Some of this information will be stored on the National Pupil Database. Organisations can request information from the National Pupil Database which includes information about your child. But they are only allowed to do this for limited purposes and they must be very careful about how they use your child's information. More information can be found here - <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information> - LO, SPI
20. We will need information about any court orders or criminal petitions which relate to your child. This is so that we can safeguard your child's welfare and wellbeing and the other pupils at the School - LI, PI, SPI.
21. [• If your child is from another country we have to make sure that they have the right to study in the UK. Sometimes the government will ask us to provide information as part of our reporting requirements. In addition to this we have a duty to provide information about your child to UK Visas and Immigration - LI, LO, PI, SPI.]
22. Depending on where your child will go when they leave us we will provide their information to [• other schools and colleges]. For example, we will share information about your child's exam results and provide references - LI, PI, SPI.
23. If your child has a safeguarding file, we are legally required to pass this file to their next school - LI, LO, PI, SPI, ESP.
24. If your child takes public examinations we will need to share information about them with examination boards. For example, if your child requires extra time in exams - LI, PI, SPI.
25. We may need to share information with the police or our legal advisers if something goes wrong or to help with an enquiry. For example, if one of your child's classmates is injured at School or if there is a burglary - LI, LO, PI, SPI, LC.
26. We use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We will share your child's information with them if this is relevant to their work - LI, PI, SPI.
27. [• If your child has misbehaved in a serious way, we may need to share information with the police and we may need to use information about the action taken by the police - LI, LO, PI, SPI, ESP.]
28. We may share some information with our insurance company to make sure that we have the insurance cover that we need - LI, PI, SPI, LC.
29. If you have appointed an agent to act on your behalf during the admissions process, then we may share information about your child with them. For example, we may send them the acceptance letter so that they can pass this on to you- LI.

30. We will share your child's academic and (where fair) their behaviour records with you [• or their education guardian] so you can support their schooling - LI, PI, SPI.
31. We will monitor your child's use of email, the internet and mobile electronic devices e.g. iPads. This is to check that your child is not misbehaving when using this technology or putting themselves at risk of harm. If you would like more information about this you can read [• the acceptable use of IT and email policy] or speak to [• your child's form teacher] - LI, PI, SPI.
32. We may use photographs or videos of your child for the School's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the School. We will continue to use these photographs and videos after your child has left the School - LI, PI.
33. Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson - LI.
- If you have any concerns about us using photographs or videos of your child please speak to [• your child's form tutor].
34. We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing - LI.
35. We will keep details of your child's address when they leave so we can send them [• the insert alumni magazine name] and find out how they are getting on. [• We may also pass their details onto the alumni organisation which is called [• please complete]. Further information on the alumni association can be found here [• insert link]] - LI.
36. The School must make sure that our computer network is working well and is secure. This may involve information about your child, for example, our anti-virus software might scan files containing information about your child - LI.
37. [• From time to time, we may use a third party to provide activities such as an external sports coach. We may share your child's information with them, for example, to tell them what sports they are good at- LI, PI].
38. We can keep information about your child for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the School - LI.

We will only share your child's information with other people and organisations when we have a good reason to do so. In exceptional circumstances we may need to share it more widely than we would normally.

We sometimes use contractors to handle personal information on our behalf. The following are examples:

- [• IT consultants who might access information about your child when checking the security of our IT network]; and

- [• we use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the School site].

If you have any questions about the above, please speak to [• your form tutor].

### **Criminal offence information**

In exceptional circumstances, we may use information about criminal convictions or offences. We will only do this where the law allows us to. This will usually be where such processing is necessary to carry out our obligations, to exercise our rights or to look after our pupils.

### **More than one basis**

As you will see from the information above, in some cases we will rely on more than one basis for a particular use of your child's information. In addition, we may move from one of the legal bases listed above to another as circumstances change. For example, as a safeguarding matter becomes more serious, we may start to rely on "legal obligation" to share personal information with the local authority in addition to the other legal bases which are noted for safeguarding purposes.

### **Consent**

We may ask for your consent to use your child's information in certain ways as an alternative to relying on any of the bases in the table above. For example, we may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on legitimate interests. If we ask for your consent to use your child's personal information you can take back this consent at any time.

Any use of your child's information before you withdraw your consent remains valid. Please speak to [• your child's form teacher] if you would like to withdraw any consent given.

### **Sending information to other countries**

We may send your child's information to countries which do not have the same level of protection for personal information as there is in the UK. For example, we may [• store your child's information on cloud computer storage based overseas].

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: [https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)

If the country that we are sending your child's information to is not on the list, or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland), then it might not have the same level of protection for personal information as there is in the UK.

We will provide you with details about the safeguards which we have in place outside of this privacy notice. If you have any questions about the safeguards that are in place please contact [• the Headmaster].

### **For how long do we keep your child's information?**

We keep your child's information for as long as we need to in order to educate and look after them. We will keep certain information after your child has left the School, for example, so that we can find out what happened if you make a complaint.

In exceptional circumstances we may keep your child's information for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

Please see our Record Keeping and Archive Policy for more detailed information. This can be found on our website here [[link](#)].

### What decisions can you make about your child's information?

From May 2018 you will be able to make various decisions about your child's information. Some of these are new rights whilst others build on your child's existing rights. Your child's rights are listed as follows:

- **Rectification:** if information held by the School about your child is incorrect you can ask us to correct it.
- **Access:** you can also ask what information we hold about your child and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about your child, where it came from and what types of people we have sent it to.
- **Deletion:** you can ask us to delete the information that we hold about your child in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your child's information to you or to a third party in a format that can be read by computer in certain circumstances.
- **Restriction:** our use of information about your child may be restricted to simply storing it in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.
- **Object:** you may object to us using your child's information where:
  - we are using it for direct marketing purposes (e.g. [[to send your child School publications](#)]);
  - the legal basis on which we are relying is either legitimate interests or performance of a task carried out in the public interest. Please see the section "Our legal bases for using your child's information" above;
  - we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of your class for historical reasons.

[[The Headmaster](#)] can give you more information about your child's data protection rights.

### Further information and guidance

This notice is to explain how we look after your child's personal information. [[The Headmaster](#)] can answer any questions which you might have.

Please speak to [[the Headmaster](#)] if:

- you would like to exercise any of your child's rights listed above; or
- you would like us to update the information we hold about your child; or

- you would prefer that certain information is kept confidential.

If you consider that we have not acted properly when using your child's personal information you can contact the Information Commissioner's Office: [ico.org.uk](https://ico.org.uk).