



# **How We Use Your Information Privacy Notice for Parents**

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**Independent Day School for Boys and Girls**

**The Downs Preparatory School**

May 2018

## Parent 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 your family circumstances, your financial information and photographs of you.

We strongly recommend reading the full version of our parent privacy notice which can be found here and on the School's website. You can also obtain a copy of the full privacy notice by contacting the Bursar at the School. 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 grounds for using your personal information.

The School's primary reason for using your personal information is to provide educational services to your child.

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

- We obtain information about you from admissions forms and from your child's previous school. We may also get information from professionals such as doctors and from local authorities.
- We may have information about any family circumstances which might affect your child's welfare or happiness.
- We will process financial information about you in relation to the payment of fees. In some cases we get information about you from third parties such as credit reference agencies or from your child's previous school(s).
- We may take photographs or videos of you at School events to use on social media and on the School website. This is to show prospective parents and 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.
- We may 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 may keep details of your address when your child leaves the School so we can send you details of the former pupils' organisation, the Charltonians, and find out how your child is progressing. We may also pass your details onto the Charltonians.

In some situations we may need to share your information with third parties. For example:

- In accordance with our legal obligations, we may share information with local authorities, the Independent Schools Inspectorate and the Department for Education, for example, where we have any safeguarding concerns.

- If you have unpaid fees while your child is at the School we may share information about this with other schools or educational establishments to which you intend to send your child.
- On occasion, we may need to share information with the police, our legal advisors and our insurers.

The Bursar is the person responsible at our school for managing how we look after personal information. The Bursar will answer questions which you may have about how we use your personal information.

## Parent Privacy Notice

### Introduction

This notice is to help you understand **how** and **why** we collect personal information about you 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 contact the Bursar.

### What is personal information?

Personal information is information that identifies you as an individual and relates to you.

This includes your contact details, next of kin and financial information. We may also hold information such as your religion or ethnic group. CCTV, photos and video recordings of you are also personal information.

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

We set out below examples of the different ways in which we use personal information and where this personal information comes from. The School's primary reason for using your personal information is to provide educational services to your child.

- We obtain information about you from admissions forms and from your child's previous school. We may also get information from professionals such as doctors and from local authorities.
- We may have information about any family circumstances which might affect your child's welfare or happiness.
- We may need information about any court orders or criminal petitions which relate to you. This is so that we can safeguard the welfare and wellbeing of your child and the other pupils at the School.
- We use CCTV to make sure the school site is safe. CCTV is not used in private areas such as toilets.
- We may use your information when dealing with complaints and grievances made to the School. For example, if you make a complaint or if another parent complains about an issue which involves you.
- We may take photographs or videos of you at School events to use on social media and on the School website. This is to show prospective parents and 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.
- We may 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 may keep details of your address when your child leaves the School so we can find out how your child is progressing. We may also pass your details onto the alumni organisation which is called the Charltonians.

- We may use information about you if we need this for historical research purposes or for statistical purposes.

#### Financial information

- We will process financial information about you in relation to the payment of fees. In some cases we get information about you from third parties such as credit reference agencies or from your child's previous school(s).
- We may hold information about bankruptcy petitions and statutory demands.
- We may search the files of any licensed credit reference agency in order to verify your identity. This also allows us to assess your application for the award of a bursary or for credit in contemplation of an agreement for the deferment of fees.
- The credit reference agency will keep a record of that search and details about your application. This record will be seen by other organisations which make searches about you.
- Failure to supply information may result in a refusal of an award or credit.

#### Sharing personal information with third parties

- In accordance with our legal obligations, we may share information with local authorities, the Independent Schools Inspectorate, Ofsted and the Department for Education, for example, where we have any safeguarding concerns or to comply with our legal obligations.
- On occasion, we may need to share information with the police for the prevention and investigation of crime and the prosecution of offenders. We will only do this in specific circumstances to assist the police with their investigations.
- We may also need to share information with our legal advisers for the purpose of obtaining legal advice.
- Occasionally we may use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We might need to share your information with them if this is relevant to their work.
- If your child is not of British nationality we have to make sure that your child has the right to study in the UK. We might have to provide information about you to UK Visas and Immigration to comply with our duties as a Tier 4 sponsor.
- We may share some information with our insurance company, for example, where there is a serious incident at the School.
- If you have unpaid fees while your child is at the School we may share information about this with other schools or educational establishments to which you intend to send your child.
- If your child leaves us to attend another school we may need to provide that school with information about you. For example, details of family circumstances for safeguarding reasons.
- We may share information about you with others in your family, such as another parent or step-parent. For example, where this is part of our obligation to take care of your child, as part of our wider legal and regulatory obligations, or in connection with school fees.

- The School is a registered charity which means that in exceptional circumstances we may need to share your information with the Charity Commission e.g. in the event of a serious incident.
- We may need to share information if there is an emergency, for example, if you are hurt whilst on School premises.
- We sometimes use contractors to handle personal information on our behalf. The following are examples:
  - IT consultants who might access information about you 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.

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

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

#### Legitimate interests

This means that the School is using your information when this is necessary for the School's legitimate interests except when this would be unfair to you. The School relies on legitimate interests for many of the ways in which it uses your information.

Specifically, the School has a legitimate interest in:

- providing educational services to your child and to other children;
- safeguarding and promoting the welfare of your child (and other children), employees and all visitors to the School;
- promoting the objects and interests of the School. This includes fundraising and using photographs of you at our school events in promotional material. It also includes making sure that we are able to enforce our rights against you, for example, so that we can contact you if unpaid school fees are due;
- facilitating the efficient operation of the School; and
- ensuring that all relevant legal obligations of the School are complied with (for example in relation to inspections).

In addition your personal information may be processed for the legitimate interests of others. For example another school will have a legitimate interest in knowing if you have not paid School fees that are due to us.

If you object to us using your information where we are relying on our legitimate interests as explained above please speak to the Bursar.

#### Necessary for a contract

We will need to use your information in order to perform our obligations under our contract with you. For example, we need your name and contact details so that we can update you on your child's progress and so that we can contact you if there is a concern.

#### Legal obligation

Where the School needs to use your information in order to comply with a legal obligation, for example to report a concern to Children's Services. We may 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

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).

#### Public interest

Another ground that the School relies on to use your information is that it is necessary in the public interest. For example, to provide your child with an education, to look after your child and their classmates or when the School is inspected.

The School must also comply with an additional condition where it processes special categories of personal information. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or orientation.

#### Substantial public interest

The School is also 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 may use special categories of information about you to provide your child with an education, to look after your child and their classmates or when the School is inspected.

#### Employment and social protection law

There may be times when the School needs to use your information because we are an employer. Also the School may use your information to comply with social protection law (e.g. to look after your child) and social security laws (e.g. to provide your child with free school lunches if applicable).

#### 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:

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.

#### Medical purposes

This includes medical treatment and the management of healthcare services.

We may ask for your consent to use your information in certain ways. 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 contact to the Bursar if you would like to withdraw any consent given.

In some cases we will rely on more than one of the grounds above for a particular use of your information. For example, we may rely on legitimate interests and public interest grounds when using your information for safeguarding reasons.

### **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]; or
- communicate with you by email when you are overseas (for example, when you are on holiday).

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: [http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm)

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.

### **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 your child. We will keep some 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 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.

Details of our data and records retention policies can be obtained from the Bursar.

### **What decisions can you make about your information?**

From May 2018 data protection legislation gives you a number of rights regarding your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

- if information is incorrect you can ask us to correct it;
- you can also ask what information we hold about you and be provided with a copy. 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;
- 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;
- you can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer;
- our use of information about you may be restricted 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;

The Bursar can give you more information about your data protection rights.

## **Further information and guidance**

The Bursar is the person responsible at our school for managing how we look after personal information and deciding how it is shared.

Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.

This notice is to explain how we use your personal information. The Bursar can answer any questions which you may have.

Please speak to the Bursar if:

- you object to us using your information for marketing purposes e.g. to send you information about school events. We will stop using your information for marketing purposes if you tell us not to; or
- you would like us to update the information we hold about you; or
- you would prefer that certain information is kept confidential.

If you fail to provide certain information when requested, we may not be able to perform our obligations under the contract we have entered into with you.

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