



PRIVACY NOTICE FOR YOUNGER PUPILS

Author:	Bursar
Reviewed:	August 2024
Next Review Due:	August 2025
Scope:	All Schools

This notice is to help you understand and we collect your child's personal information and 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 Bursar.

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 ensuring that we know about any pastoral adjustments such as foods that your child will not eat. CCTV, photos and video recordings of your child are also personal 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 in paragraphs 1 to 39 below.

Legitimate interests ()

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 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 ()

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, the police

13. 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 - ,
14. 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 - , ,
15. When we are inspected by the Independent Schools Inspectorate we will have to make your child's information available to the inspectors to assist them with their inspection - , ,
16. 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 - , ,
17. 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 - ,
18. 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> -
19. 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 - , ,
20. 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 - , , .
21. 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. If your child has special educational needs we will pass this information on to their next educational establishment. - , , .
22. If your child has a safeguarding file, we are legally required to pass this file to their next school - , ,
23. 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, evidence of work such as recordings of music pieces, or video of an ABRSM online music theory examination - , ,
24. 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 a pupil is injured at School or if there is a burglary - , ,
25. 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 - , ,

26. If your child has misbehaved in a serious way, we may need to share information with the police or other government law-enforcement bodies and we may need to use information about the action taken by the police - ,

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 - .
39. From time to time, we may use a third party to provide activities or services such as an external sports coach or school photography company, or we may arrange for pupils to take part in external events such as arts festivals or sporting competitions. We may share your child's information with the provider, for example, to tell them what sports they are good at, and obtain information from them after activities have been undertaken. We may share your child's information with trainee teachers working in the School - , .

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:

- NS Optimum, our 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. Examples include Microsoft Office 365, iSAMS, SurveyMonkey, SmugMug, Parents Evening System (School Cloud Systems Ltd), Tapestry (The Foundation Stage Forum Ltd) and Seesaw (Seesaw Learning, Inc.).

If you have any questions about the above, please speak to your child's form teacher.

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.

As you will see from the information above, in some cases we will rely on more than one basis for a

- we may store your child's information on cloud computer storage based overseas;
- we may share information with overseas pupils, their parents and with their overseas educational agents;
- we may share information with an overseas travel agent when organising trips.

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

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 Bursar.

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 Information and Records Retention Policy for more detailed information. This can be obtained from the Bursar.

Data protection legislation gives you a number of rights regarding your child's information. Your child's rights are as follows:

- **Right to rectification** : if information held by the School about your child is incorrect you can ask us to correct it.
- **Right of 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.
- **Right to erasure** : 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.
- **Right to 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.
- **Right to 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.
- **Right to object** you may object to us using your child's information where:
 - we are using it for direct marketing purposes (e.g. to send you the School newsletter);

- 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 Bursar can give you more information about your child's data protection rights.

This notice is to explain how we look after your child's personal information. The Bursar can answer any questions which you might have.

Please speak to the Bursar if: g0 GJJT@MC /Spa1to the. 56.664 6 /.i0 595.32 873.19 reW*ñBT/00781.04 Tf1 0 0 1 185.9