



POLICY DOCUMENTS

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Parent Privacy Notice

1. Introduction

- This notice is to help you understand **how** and **why** the School collects personal information about you and **what** it does 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.

2. 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. The School will also hold information such as your religion or ethnic group.

3. The School's legal bases for using your information

- This section contains information about the legal bases that the School is relying on when handling your information.
- The two tables below contain a general description of the different legal bases but the School has also used a colour code system so that you can see which bases it relies on for each of the purposes described below.

Legitimate interests ("LI")

This means that the School is using your information when this is necessary for the School's legitimate interests except when your interests and fundamental rights override our legitimate interests.

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, other children and our employees.

- 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.
- Keeping the school buildings safe.
- Using your information in connection with legal disputes. For example, if you or your child bring a claim against the School.
- Protecting the School's reputation.
- Facilitating the efficient operation of the School.
- 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.

Necessary for contract ("CT")

The School will need to use your information in order to perform its obligations under its contract with you and for you to perform your obligations as well. For example, the School needs your name and contact details so that it can update you on your child's progress and so that it can contact you if there is a concern.

Legal obligation ("LO")

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. The School 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 ("VI")

In limited circumstances the School 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")

The following are examples of when the School uses your information to perform tasks in the public interest:

- Providing your child with an education.

- Safeguarding and promoting your welfare, your child's welfare and the welfare of other children.
- Facilitating the efficient operation of the School.
- 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 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 ("SPI")

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.

Social protection and social security laws ("ESP")

Also the School may use your 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 ("VI")

In limited circumstances the School 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")

The School is allowed to use your information if this is necessary in relation to legal claims. For example, this allows the School to share information with our legal advisors and insurers.

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

- The School sets out below examples of the different ways in which it uses personal information and where this personal information comes from.

The letters highlighted in different colours below refer to the legal bases the School relies on. Please see the section above for an explanation.

- The School's primary reason for using your personal information is to provide educational services to your child - LI, CT, PI, SPI.
- The School will have information about any family circumstances which might affect your child's welfare or happiness. This is to help the School provide appropriate care and support to your child - LI, CT, PI, SPI.
- The School will need information about any court orders or criminal petitions which relate to you. This is so that the School can safeguard the welfare and wellbeing of your child and the other pupils at the School - LI, CT, PI, SPI.
- We use CCTV to make sure the school site is safe. Images captured of you via CCTV will be your personal information. CCTV is not used in private areas such as toilets - LI, CT, PI, SPI.
- If there is a complaint or grievance made to the School which involves you then it will use your information in connection with that complaint or grievance - LI, PI, SPI.
- The School may share information about you 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.
- Where appropriate, the School will have information about your religious beliefs and practices. For example, if you do not eat certain foods - LI, SPI.
- The School 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 the School does here and to advertise the School. The School may continue to use these photographs and videos after your child has left the School - LI.
- The School 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 - LI.
- The School will keep details of your address when your child leaves the School so we can send you the alumni magazine and find out how your child is progressing. The School may also pass your details onto the alumni organisation which is called Hillians. Further

information on the alumni association can be found at <https://www.kinghamhill.org.uk/alumni/alumni> - LI.]

- The School may use information about you if we need this for historical research purposes or for statistical purposes. For example, if the School considers the information might be useful if someone wanted to write a book about the School - LI.
- The School may use your information when ensuring network and information security, for example, our anti-virus software might scan files containing information about you - LI.
- The School can keep information about you for a very long time or even indefinitely if it needs this for historical, research or statistical purposes. For example, if the School considers the information might be useful if someone wanted to write a book about the School – LI.

Financial information

- The School will process financial information about you in relation to the payment of fees. In some cases the School gets information about you from third parties such as credit reference agencies or from your child's previous school(s) - LI, CT.
- The School will hold information about bankruptcy petitions and statutory demands, where relevant - LI, CT.
- The School may search the files of any licensed credit reference agency in order to verify your identity. This also allows the School 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 - LI, CT.
- The School may share your information with debt recovery suppliers if you do not pay any school fees owed to the School - LI, CT.
- The School will obtain information about you from publicly available sources, such as Companies House and Zoopla, to assess your ability to pay School fees - LI, CT.
- 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, the School will share information with local authorities, the Independent Schools Inspectorate and the Department for Education, for example, where it has any safeguarding concerns or to comply with its legal obligations - LI, LO, PI, SPI.
- On occasion, the School may need to share your information with the police for the prevention and investigation of crime and the prosecution of offenders. The School will only do this in specific circumstances to assist the police with their investigations - LI, CT, LO, PI, SPI.
- The School 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.
- In certain circumstances, the School may also need to share information with its legal advisers for the purpose of obtaining legal advice - LI, LO, PI, SPI, LC.
- Occasionally the School may use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly (e.g. our accountants). The School will share your information with them if this is relevant to their work - LI, CT, PI, SPI.
- If your child is not of British nationality the School has to make sure that your child has the right to study in the UK. Sometimes the government will ask the School to provide information as part of its reporting requirements. In addition to this the School has a duty to provide information about you to UK Visas and Immigration to comply with its duties as a Student and Child Student Routes sponsor - LI, CT, LO, PI, SPI.
- The School is a charity which means that in exceptional circumstances it may need to share your information with the Charity Commission e.g. in the event of a serious incident - LI, LO, PI, SPI.
- The School may share information about you with its insurance company, for example, where there is a serious incident at the School - LI, SPI, LC.
- If you have unpaid fees the School may share information about this with other schools or educational establishments to which you intend to send your child - LI.

- If your child leaves the School to attend another school it may provide that school with information about you. For example, details of family circumstances if there have been any safeguarding incidents - LI, LO.
- The School 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 - LI, PI, SPI.
- The School may need to share information if there is an emergency, for example, if you are hurt whilst on School premises - LI, VI.
- We will share information about you with the other part of the Kingham Hill Trust. For example, financial information or details of family circumstances - LI, PI, SPI.
- If you have appointed an agent to act on your behalf, the School may share information with them. For example, the School may send letters to them so that they can pass these on to you - LI.
- The School may send you information about the School before you accept a place for your child. For example, the School may send you a copy of the school prospectus – LI.
- If your child has an Education and Health Care Plan (EHCP), the School will share information with and obtain information from the local authority about you - LO, PI, SPI.
- The School sometimes use contractors to handle personal information on its behalf. The following are examples:
 - IT consultants who might access information about you when checking the security of the School's IT network.
 - The School use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the School site.
- The School obtain information about you from admissions forms and from your child's previous school. The School may also get information from professionals such as doctors and from local authorities.

5. Criminal offence information

- The School may only use information relating to criminal convictions and offences where the law allows us to do so. This will usually be where such processing is necessary to carry the School's obligations or to exercise our rights.
- Less commonly, the School may use information relating to criminal convictions and offences where it is necessary in relation to legal claims, where it is necessary to protect its pupils and you are not capable of giving your consent, or where you have already made the information public.

6. More than one basis

- As you will see from this notice, in some cases the School will rely on more than one basis above for a particular use of your information. In addition, the School may move from one of the legal bases listed above to another as circumstances change. For example, as a safeguarding matter becomes more serious, the School 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.

7. Consent

- The School 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, the School may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and it cannot rely on legitimate interests. If the School asks 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 the Bursar if you would like to withdraw any consent given.

8. Sending information to other countries

- In certain circumstances, the School 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, the School 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: 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 the School is 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.
- The School will provide you with details about the safeguards which it has in place outside of this privacy notice. If you have any questions about the safeguards that are in place please contact the Bursar.

9. For how long does the School keep your information?

- The School keeps your information for as long as it needs to in order to educate and look after your child. The School will keep some information after your child has left the School, for example, so that it can find out what happened if you make a complaint.
- In exceptional circumstances the School may keep your information for a longer time than usual but it would only do so if it had a good reason and only if it is allowed to do so under data protection law.
- Please see the School's Data Tracking and Retention of Information Policy for more detailed information. This can be found on our website at <https://www.kinghamhill.org.uk/about/policies>.

10. 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 the School holds about you and be provided with a copy. This is commonly known as making a subject access request. The School will also give you extra information, such as why it uses this information about you, where it came from and what types of people the School have sent it to
 - **Deletion.** You can ask us to delete the information that the School holds about you in certain circumstances. For example, where the School 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. This applies where:
 - The information has been provided by you
 - The basis that the School relies on to process your information is consent or contract (please see "The School's legal bases for using your information" above)
 - The information is being processed by the School on computer.
- **Restriction.** The School's use of information about you may be restricted to simply storing it in some cases. For example, if you tell the School that the information is inaccurate the School can only use it for limited purposes while the School check its accuracy
- **Object.** You may object to the School using your information where:
 - The School is using it for direct marketing purposes (eg to send you the School magazine)
 - The legal basis on which the School is relying is either legitimate interests or performance of a task carried out in the public interest. Please see the section "The School's legal bases for using your information" above
 - The School is using it for historical or scientific research purposes or archiving purposes. For example, the School may keep photographs of your class for historical reasons.
- The Bursar can give you more information about your data protection rights.

11. Further information and guidance

- The Bursar is the person responsible at the School for managing how it looks after personal information and deciding how it is shared.
- Like other organisations the School need to keep your information safe, up to date, only use it for what it says it would, destroy it when it no longer needs it and most importantly - treat the information it gets fairly.
- This notice is to explain how the School use your personal information. The Bursar can answer any questions which you may have.
- This privacy notice does not, and is not intended to, give you any rights which you did not already have. For example, it does not give you any additional contractual rights.

- Please speak to the Bursar if:
 - You object to the School using your information for marketing purposes e.g. to send you information about school events. The School will stop using your information for marketing purposes if you tell it not to
 - You would like the School to update the information it hold about you
 - You would prefer that certain information is kept confidential.

- If you fail to provide certain information when requested, the School may not be able to perform its obligations under the contract it has entered into with you. The School may also be prevented from complying with its legal obligations (such as to ensure the welfare of your child and their classmates).

- If you consider that the School has not acted properly when using your personal information you can contact the Information Commissioner's Office - ico.org.uk.

Catriona Thompson

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