

# PRIVACY NOTICE FOR YOUNGER STUDENTS

<b>Policy Owner</b>  PPS Director of Operations and Finance	<b>Applies to</b>  Prior Park Schools (Trust Wide)	<b>Superseded documents</b>  Privacy Notice_Younger Students v1
<b>Associated documents</b>  E-Safety Policy Safeguarding Policy Prevent Duty Policy Data Protection and associated policies and procedures ICT Systems Policy Mobile Devices Policy Social Media Policy Taking, Storing and Using Images Policy CCTV Policy	<b>Review frequency</b>  Every three years (unless the legislation/regulations update before this time)  <b>Implementation date</b>  25 September 2024	<b>Legal Framework</b>  Data Protection Act 2018 KCSIE Working together to safeguard children

This policy is reviewed triennially, or more regularly as required, prior to approval by Trustees, where applicable.

<b>Last reviewed by:</b>	Head of Compliance (Miss E Wickham)
<b>Date last reviewed:</b>	August 2024
<b>Approved by Trustees:</b>	Approved by Director of Operations and Finance (Ms E Sandberg)
<b>Date last approved:</b>	1 September 2024
<b>Date for next approval:</b>	September 2027

## 1. Introduction

Prior Park Schools (PPS) is a family of Christian schools based in Bath and Gibraltar. Prior Park College (PPC) and The Paragon School (TP) are incorporated in England as Prior Park Educational Trust Ltd. Prior Park School Gibraltar (PPSG), is incorporated in Gibraltar as Prior Park School Ltd. Both are companies limited by guarantee and registered charities.

The Prior Park Schools mission, underpinned by shared values, is to steward a thriving family of communities with love for the young people they serve at their heart. These vibrant communities cultivate creativity, foster integrity, and transform lives.

Prior Park Schools Values:

Curiosity - Generosity - Courage

## HOW WE USE YOUR INFORMATION - PRIVACY NOTICE for OLDER STUDENTS

### 2. How we use your information

#### Privacy Notice for the Parents of Younger Students (those under the age of 13)

- 2.1 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.
- 2.2 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 13) they will be considered mature enough to exercise their own data protection rights.
- 2.3 Safeguarding and Child Protection requirements always override data protection considerations. If information should be shared in the interests of safeguarding or acute child protection matters, data protection legislation and this policy can never be used as a reason not to do so.

### 3. What is Personal Data?

- 3.1 Personal data is information the School holds about your child and which identifies your child as an individual and relates to your child.

3.2 This includes information such as your child's name, date of birth and address as well as things like exam results, medical details and behaviour records.

3.3 The School may also record sensitive personal data such as your child's medical history, religion or ethnic group.

3.4 CCTV, photos and video recordings of your child are also personal information.

#### **4. How and Why does the School collect Personal Data?**

4.1 Admissions forms give us lots of personal information about your child. Your child's old school also gives us information about your child so we can teach and care for them. We get information from you, your child's teachers and other students. Sometimes we get information from your child's doctors and other professionals where we need this to look after your child.

4.2 We collect this information and use it to safeguard our students, to help the School run properly, safely and to let others know what we do here. Here are some examples:

- a. We need to tell all your child's teachers if your child is allergic to something or might need extra help with some tasks.
- b. We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms.
- c. We may need to report some of your child's information to the authorities. For example, we may 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.
- d. If your child is from another country, we have to make sure that your child has the right to study in the UK. This process is managed by an external organisation, with whom the School has a legally binding contract regarding management of data. We may provide information to UK Visas and Immigration who are part of the government.
- e. Depending on where your child will go when he/he/she leaves us we may need to provide her information to other schools, colleges and universities or potential employers. We may share information about your child's exam results and provide references.
- f. We may need to share information with the police or our legal advisers if something goes wrong or to help with an inquiry. For example, if one of your child's classmates is injured at School or if there is a burglary.
- g. We may share some information with our insurance company to make sure that we have the insurance cover that we need.
- h. We may share your child's academic and (where fair) her behaviour records with you or education guardian so you can support her schooling.
- i. We will only share your child's information with other people and organisations when we have a good reason to do so.
- j. We will monitor your child's use of email, the internet and mobile electronic devices e.g. PLDs. If you would like more information about this you can read the E Safety and E Safety Acceptable Use Policy for Students or speak to your child's Tutor or Housemaster/Housemistress (HsM)/HoH
- k. We may use photographs or videos of your child for the School's website and social media sites or prospectus to show prospective students what we do here as well as for teaching purposes. We may also use photographs or videos of your child in advertisements for School. We do not publish a child's picture together with their name without express permission
- l. 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.

- m. We supply summary statistical information for student exam results to the national press and educational associations, for example the Independent Schools Council. However, this information would not allow your child to be identified.
- n. We may on occasion use your child’s exam results and future plans as a case study in the media, but we would seek your permission first.
- o. We will keep details of your child’s address when he/he/she leave so we can send her alumni information and find out how he/he/she is getting on. We may also pass your details onto the alumni organisation and they will seek your consent to keep in touch with you

### 5. What do we do with your child’s personal information?

The Director of Finance and Operations (DFO) is the person responsible at our School for managing how we look after personal information and deciding how it is shared.

We need to keep your child’s 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.

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 Student Database. Organisations can request information from the National Student Database which might include 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.

In exceptional circumstances we may keep your child’s information for a longer time than usual or share it more widely than we would normally.

DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare.

The table below shows for how long we keep different types of your information.

Type of information	Retention period or the criteria used to determine the retention period
Contact information	6 years after the student has left
Data contained in the history of the School; for example - images of events or names on reports.	Indefinitely
Data contained on CCTV images	21 days unless requested by the police and only if compliant with the GDPR

### 6. What decisions can you make about your information?

You can make various decisions about your child’s information. These rights are:

- a. If information is incorrect you can ask us to correct it.

- b. If you would like us to change or update the information we hold about your child please speak to School Office, your child's Tutor or HsM. You can also ask what information we hold about your child.
- c. You can ask what information we hold about your child and be provided with a copy. 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.
- d. 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 for any reason.
- e. You can ask us to send you, or another organisation, certain types of information about your child in a format that can be read by computer.
- f. Our use of data about your child may be restricted in some cases. For example, if you tell us the information is incorrect we can only use it for limited purposes whilst we check accuracy.

If you would prefer, we keep certain information confidential please speak to the DFO.

## **7. Further information and guidance**

If you have any questions you can ask the Director of Operations and Finance (DOF) or the Assistant Head, Compliance. about how it works in our School.

Further information is available from the Information Commissioner's Office.

## **8. 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:

- a. store your child's information on cloud computer storage based overseas or
- b. communicate with you by email when you are overseas (for example, when you are on holiday or when you have provided an address whose server is overseas).

The European Commission has produced a list of countries, which have adequate data protection rules.

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 in place outside of this privacy notice.

## **9. Our Legal Grounds for Using your Information**

This section contains information about the legal basis that we are relying on when handling your child's 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 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 your child 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 child's information in connection with legal disputes. For example, if you or your child bring a claim against the School
- Protecting the Trust and School's reputation
- Facilitating the efficient operation of the School; and
- Ensuring that all relevant legal obligations of the School are complied with (e.g. in relation to inspections).

In addition, your child's 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 a serious medical condition.

### **Necessary for Contract**

We will need to use your information in order to perform our obligations under our contract with you and for you to perform your obligations as well. 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 child's 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 child's information to third parties such as the courts, the local authority or the police where legally obliged to do so.

DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare.

### **Vital Interests**

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

### **Performance of a Task carried out in the Public Interest**

The following are examples of when we use 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; 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 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 child's information to protect her vital interests or the vital interests of someone else (e.g. if he/she or they are seriously hurt).

**Legal Claims**

We are allowed to use your child's 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.

Please note we also publish a Parents Privacy Notice and Privacy Notice for Older Students.