

# PRIVACY NOTICE FOR PARENTS

<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Superseded documents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_Parents v1
<b>Associated documents</b> Data Protection Policy and associated policies and procedures CCTV Policy	<b>Review frequency</b> Every three year (unless the legislation/regulations update before this time) <b>Implementation date</b> 25 September 2024	<b>Legal Framework</b> Data Protection Act 2018

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 PARENTS

### 2. How we use your information

#### Privacy Notice for Parents

Prior Park School takes your privacy seriously. This notice is to help you understand **how** and **why** we collect personal data about you. It also explains the decisions that you can make about your own information

If you have any questions, please contact the Director of Finance and Operations (DFO).

### 3. What is Personal Data?

3.1 Personal data is information that identifies you as an individual.

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

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

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

4.2 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.

4.3 Information is also received by the School directly from you. For example, you might email us with information about your marital status or provide us with documents such as court orders.

4.3 We collect this information to safeguard and promote the welfare of your child, promote the objects and interests of the School, facilitate the efficient operation of the School and ensure that all relevant legal obligations of the School are complied with.

4.4 Here are some examples:

- a. We may have information about any family circumstances which might affect your child's welfare or happiness.
- b. We ask if any of your child's immediate family members have special educational needs because in some cases these can be hereditary. The School can then use this information to assist your child.
- c. We may need information about any court orders or criminal procedures which relate to you.
- d. We use CCTV to make sure the school site is safe. CCTV is not used in private areas such as changing rooms.
- e. We may keep details of your address when your child leaves the School so we can send alumni information and find out how your child is progressing. We may also pass your details onto the alumni organisation only with consent

## **5. Financial Information**

5.1 In accordance with our legal obligations, 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).

5.2 We may hold information about personal insolvency.

5.3 We may search the files of any licensed credit reference agency in order to verify your identity.

5.4 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.

5.5 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.

## **6. Sharing Personal Data with Third Parties**

6.1 In accordance with our legal obligations, we will share information with local authorities, the Independent Schools Inspectorate and the Department for Education, for example, where we have any safeguarding concerns or to comply with our legal obligations.

6.2 On occasion, we may need to share information with the police or our legal advisers.

6.3 If your child is not of British nationality 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 about you to UK Visas and Immigration to comply with our duties as a Child Student sponsor.

6.4 We may share some information with our insurance company, for example, where there is a serious incident at the School.

6.5 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.

6.6 We may need to share information if there is an emergency, for example, if you are hurt whilst on School premises.

6.7 Occasionally we 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). We will share your information with them if this is relevant to their work.

6.8 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;
- b. Third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the School site.

6.9 The School is a 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.

6.10 We may share information about you with others in your family, such as another parent or stepparent. 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.

6.11 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.

6.12 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. This list is indicative and not exhaustive.

## **7. What do we do with your Personal Information?**

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

7.2 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.

7.3 We keep your information for as long as we need to in order to educate and look after your child.

7.4 We will keep some information after your child has left the School, for example, so we can find out what happened if your child needs references or you make a complaint or claim against the School.

7.5 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 as allowed under Data Protection legislation.

7.6 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.

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

For further information refer to the PPS Data Retention and Destruction Policy

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

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

- a. If information is incorrect you can ask us to correct it.
- b. You can also ask what information we hold about you and be provided with a copy.
- c. You can ask us to delete the information we hold about you in certain circumstances. For example, where we no longer need the information.
- d. 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.
- e. Our use of data about you 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.

## 9. 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 Schools.

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

## 10. 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:

- a. store your 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.

## 11. 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 Privacy Notice for Younger Students and a Privacy Notice for Older Students.