

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.

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 or other public bodies where legally obliged to do so.

Vital interests

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

Performance of a task carried out in the public interest (or carrying out public tasks) ()

This applies where what we are doing is for the benefit of people generally. The following are examples of where this applies:

- providing your child and others with an education;
- safeguarding and promoting 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 include: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, health information, and information about sex life or orientation.

Substantial public interest ()

The School is 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 will use information about your child's health to look after him/her. We may also use other types of special category personal information about your child to provide ETO information, and

We set out below different ways in which we use personal information and where this personal

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

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 - , , .
27. We may share some information with our insurance company to make sure that we have the insurance cover that we need - , , .
28. Parents who are based outside of the UK will sometimes appoint someone to act on their behalf during the

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, 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.

- 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 object** : our use of information about your child may be restricted to simply storing it in some

- 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:

- you would like to exercise any of your child's rights listed above; or
- you would like us to update the information we hold about your child; or
- you would prefer that certain information is kept confidential.

If you consider that we have not acted properly when using your child's personal information you can contact the Information Commissioner's Office on 01625 544700 or visit www.ico.org.uk