



## Privacy Notice for Parents and Carers

<b>Date of last review:</b>	October 2021	<b>Review period:</b>	1 year
<b>Date of next review:</b>	July 2022	<b>Owner:</b>	Data Compliance Lead

## **Prep Schools Trust**

### **Privacy Notice for Parents / Carers**

#### **Who is this information for?**

Prep Schools Trust (the “Trust”) is committed to protecting your personal data and being transparent about how we use it.

This Privacy Notice is for parents and carers of our pupils. This includes the biological parents of a pupil, other individuals who are not biological parents but have parental responsibility for a pupil, and those who have care of a pupil. It aims to give you a clear explanation of the types of personal information (or “personal data”) we collect, how we use it (or “process” it) and whether we share it with others outside the Trust. It also explains your legal rights and choices regarding the personal information we hold that relates to you.

#### **Who is responsible for your personal data?**

The Trust is the data controller of your personal data. This means it is responsible for how and why your personal data is used.

This Notice is intended to be written on behalf of all the schools in the Trust i.e. Barfield, Chandlings Prep, Cothill House, Kitebrook Preparatory or Mowden Hall.

#### **Our contact details**

If you have any questions about this Privacy Notice or your personal data, please contact the Trust’s Data Compliance Lead or your school’s Data Compliance Lead.

The Trust Data Compliance Lead is Jo Fitzroy-Ezzy. You can speak to her on 01865 390720 or you can leave a letter at your school reception (marked for the Data Compliance Lead’s attention) or send one by post to 7, Cothill, Abingdon OX13 6JN. You can also email by using the email address [datacompliance@prepschoolstrust.org](mailto:datacompliance@prepschoolstrust.org).

The person in Kitebrook Preparatory with responsibility for data protection compliance at the school is Daniel Parvin and you may contact them using any one of the contact details below.

[datacompliance@kitebrookpst.org](mailto:datacompliance@kitebrookpst.org)

Kitebrook House, Kitebrook, Little Compton, Gloucestershire, GL56 0RP  
01608 674350

## What sort of information might we collect about you?

Depending on circumstances, we may collect and use the following types of personal information about you, and where relevant, your personal contacts that you have provided to us:

- **Identity and contact data** such as your name, title, gender, nationality, country of residence, postal address, telephone numbers, email address.
- **Safeguarding information**, e.g. if you have a family social worker or if there is a court order in place involving you or a member of your family.
- **Financial Information** such as relating to your income and assets if applying for a bursary.
- **Images** such as images of you taken from the school's CCTV cameras and/or photographs and video recordings held both in digital and manual format (for example, in the background on sports day or an event). More details about this are in our Use of Images Policy.
- **Correspondence** between us such as emails or letters, and correspondence relating to your child, or any incidents and complaints.
- **Information about how you use our information and communications systems** including email and for example, our parent portal.
- **Employment status and occupation** including job titles, location of employment or workplace.
- Any information relating to you, your circumstances and your opinions that you choose to provide to us.

### Special categories of personal data

Where necessary, we may also collect special categories of personal data about you which are more sensitive and require a higher level of protection. For example:

- Medical and health information. For example, information about any medical conditions that you have that the school or Trust needs to know about, e.g. such as allergy information if you are attending an event or where we need this information because it is relevant to how we look after your child.

### Criminal offence data

Rarely, the school or Trust may also collect and use information about criminal offences (such as information about criminal convictions or allegations) but only where the law allows us to do this and it is necessary.

## Where do we get your information from?

The information we hold about you comes from different people and places. Most of it comes from you, for example, where you have completed forms when your child joined the school or when you communicate with us.

Sometimes we collect your information from other people and places outside the school and Trust. This may be your child's previous school (if relevant), a neighbour or relative, professionals such as a social worker or doctor or third-party agencies such as the Local Authority, Police or the Department for Education (DfE).

### **Why do we need information about you and other parents / carers?**

We need information about the parents / carers of our pupils for various reasons, including to:

- run the school your child(ren) attend;
- keep you updated on your child's attainment and progress;
- in order to fulfil our legal and statutory obligations, rights and obligations;
- in order to fulfil our contractual obligations under the parent contract with you;
- keep you informed about operational matters, such as emergency closures, events, and pupil trips;
- process payments for educational services, schools' activities and trips;
- to provide appropriate pastoral care;
- to deal with admissions queries and manage admissions waiting lists;
- Assess eligibility for an award of a bursary;
- to comply with our legal obligations as an education provider; and
- to support and safeguard your child.

For prospective parents, we need to use personal data about you for your child's proposed admission to the school, for example, to administer our list of prospective parents and manage the school's admissions process.

Data protection law requires us to have a valid legal reason to use your personal information. Our legal reasons for collecting and processing your personal data are set out below:

**Legal Reason:** The school and Trust needs to use your personal information because it is necessary **to comply with a legal obligation**, for example:

- To comply with our legal obligations as an education provider, for example:
  - to safeguard the welfare of your child in line with Keeping Children Safe in Education (statutory guidance for schools and colleges); and
  - to monitor and report to you on your child's progress under the Education (Independent School Standards) Regulations 2014.

**Legal Reason: To comply with our contractual obligations**, for example, we will process pupil personal data in order to comply with our obligations under the parent contract with you for your child(ren) to attend the school.

**Legal Reason:** the use of your personal information is necessary for our **legitimate interests** (or occasionally the interests of another), provided those interests are not outweighed by the impact to your own rights; for example:

- It is necessary for us to hold and use your information in order to run the school, to provide education and so we can look after our pupils properly. This is a task which is in the Trust's and everyone's legitimate interests because everybody needs to have an education. This means we have a real and proper reason to use your information.
- To administer and retain applications for admission, including confirmation of eligibility to apply.
- To maintain admissions waiting lists.
- To monitor and report on progress of pupils.
- To comply with laws relating to your child's attendance.
- To look into a complaint or carry out an investigation.
- To process payments for the use of our services.
- For your safety and security including through the use of our CCTV system in some of our schools.
- To use images, video and audio recordings of you on the Trust and school website or our social media channels. We will only do this if it is appropriate. If necessary we will ask for your consent first.
- To share or receive personal information about you with other educational establishments, for example, this could include references or in the case of another educational establishment, outstanding fees or payment history.
- If we receive a donation, to process the personal information of a donor for due diligence purposes.
- Unless we need your consent, we may use your personal information for fundraising and direct marketing purposes. For example, to send alumni information about a fundraising event.
- Where we need to use your personal information for reasonable school purposes such as obtaining insurance or asking for advice from someone outside the school.

**Legal Reason: Where we need your consent:** In most cases, we will not need your consent to use your personal information. However, there are a few occasions where we either need it or choose to ask for it. Where we ask for consent to use your personal information, you have the choice not to give it. Even if you do consent you can change your mind at a later date.

We will ask for consent to use your information in these sorts of circumstances:

- To use images, video and sometimes audio recordings of parents and carers in the school and on the school and Trust website or our social media channels. We will only do this if it is appropriate. If necessary we will ask for your consent first.
- To share photographs (or video) of you with others outside the school and Trust such as a journalist.

For example, where you are prominently featured in a photograph at a school event and that image is shared with a journalist for their own journalistic purposes. We will only do this if it is appropriate and if necessary we will ask for your consent first.

- To send you school and Trust marketing and fundraising information by email that you have not specifically requested. Where necessary we will obtain your consent in advance before doing this.
- Prior to undertaking wealth screening for fundraising purposes;
- To share your personal information with organisations that are closely connected with but separate to the school and Trust such as the PTA, visiting music teachers so that they can contact you for their own purposes. Where necessary, we will obtain your consent in advance before sharing your personal information with these organisations.

### **Using your Special Category Personal Data**

Occasionally, the school and Trust may need to collect and use your special category personal data such as information about your health or religious beliefs. The legal reasons for doing this include:

**Vital interests:** For example, to share information about medical conditions that you may have with a doctor or hospital in the event of an incident or accident when you are visiting the school;

**Legal Claims or Judicial Acts:** For example, where your information is required to be used by the school and Trust in a legal process, e.g. if you have brought legal action against us;

**Reasons of Substantial Public Interest:** For example, to share information relating to you with the police or social services where this is necessary for safeguarding a pupil's welfare; or for legal and regulatory purposes such as child protection, or health and safety.

**Public health:** for example, where your information needs to be collected and used in connection with a public vaccination programme or in response to a pandemic such as the COVID-19 pandemic. Where this happens, the data is handled by a health professional such as a nurse or someone who the law says must keep your information confidential.

### **Do we need your consent to use your personal information?**

In most cases, the school and Trust will not legally rely on your consent in order to process your personal data. However, occasionally where we do rely on your consent to use your personal data, we will explain clearly what we want to do with your personal data. Usually, it will be for an activity that is not closely related to our functions of running the school but we think would be of benefit to our pupils and the school and Trust as a whole.

When we ask for your consent to use your personal information you have the legal right to withdraw your consent at any point in time.

If we rely on consent to process your personal data and you wish to withdraw your consent, simply contact our School Data Compliance Lead using any of the contact details above in the section called “*Our Contact Details*”. Alternatively, if you are receiving a marketing email from the school and Trust you can click on the “unsubscribe” link within that email. Please note that direct marketing will not cease immediately but will stop within a reasonable period of time.

The withdrawal of your consent does not affect the lawfulness of our processing of your personal data prior to the withdrawal of your consent.

If you choose not to provide us with your personal information, or withdraw your consent to us using your information, we may not be able to provide some of our services you have requested from us. We will let you know at the time if this is the case.

#### **Who else has access to your personal information?**

In most cases your information stays within the school and Trust. Sometimes, we may share your information with others outside the school and Trust where they are providing us with a service, to help and support your child or to use for their own purposes. We will never share your information with anyone outside the school or Trust without your consent unless a law permits us to do so.

We may share your information with others outside the school and Trust for the following purposes and in the following circumstances:

- Anyone where you have consented;
- Organisations/service providers that help us run the school such as IT services, cloud storage providers, organisations that send out our email, mail, organisations that handle payments for trips etc.;
- For the purpose of assessing eligibility for an award of a bursary data is shared with a third party, Bursary Administration Limited;
- Professionals who may work inside or outside the school, e.g. the school nurse, school counsellor, Child and Adolescent Mental Health Service (CAMHS);
- External organisations with whom we share your personal data and who process it for their own legal reasons. For example, the PTA, visiting music teachers, the local authority, the Charity Commission, Stage 3 complaints panels, the police, the Teaching and Regulation Authority, CAFCASS (this stands for The Children and Family Court Advisory and Support Service);

- Government departments where a law requires the Trust to share information about you in certain circumstances. For example, the DfE, local authorities and Health and Safety Executive;
- Another parent or carer (such as an ex-spouse): In certain circumstances, before sharing information about you with another parent or carer, we may consult with you first. We will also take family circumstances into account. If there is a court order about what information a parent or carer is allowed to have then we will also take that into account.

Sometimes the information we share with others about you might include special category personal data. For example, it could include information about your health, a medical condition, a disability or religion.

In rare circumstances it could include information about criminal offences. We only share this sort of information with your consent or where it is necessary and data protection law permits us to do so.

### **Transferring your Personal Information to other Countries**

In most cases we expect your information to stay here in the UK. However, occasionally we may need to transfer it outside the UK, for example, if you or another parent or carer lives abroad or if you move abroad.

Some of our suppliers and service providers are located outside the UK and may see your personal information when providing us with software support, for example or a company which we use for carrying out surveys may handle your contact information on our behalf.

On the few occasions where we do transfer your information outside the UK, we will ensure it is protected and handled in line with data protection law. For example, we will only transfer it to a country that is officially considered to provide adequate protection for personal data or alternatively we will protect it by using one of the safeguarding measures available under data protection law.

If you would like more information about how we protect your personal information if it is transferred outside the UK please contact our Data Compliance Lead at [datacompliance@prepschoolstrust.org](mailto:datacompliance@prepschoolstrust.org).

### **Automated Decision-Making and profiling**

Automated decision-making takes place when an electronic system (i.e. computer software) uses personal information to make decisions about a person without a human being involved. Profiling is a type of automated decision-making that involves collecting various pieces of information about a person in order to make decisions or predictions about that person (for example, how that person may behave or what their preferences are).



We are allowed to use automated decision-making (including profiling) in the following circumstances:

1. Where we have told you about the decision and given you 21 days so that you can ask us to reconsider that decision;
2. Where we have a contract with you (but appropriate measures must be in place to protect your own rights).
3. In limited circumstances, where you have given us your consent in writing ((but appropriate measures must be in place to protect your own rights).

If we make an automated decision about you on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

We do not envisage that any decisions will be taken about you using automated decision making (including profiling). If that changes we will tell you.

### **Supporting the school, fundraising and staying in touch with alumni**

Please note some of the activities below might not apply to you until after you have left the school.

The Trust will use your personal data for various purposes in connection with direct marketing, development and fundraising and in some cases, wealth screening.

Further examples of how the Trust will use your personal information includes:

- to send you information about the Trust and its schools, such as updates and newsletters by post or email;
- to contact you by post for fundraising and marketing purposes;
- where you have consented, to contact you by email for fundraising purposes;
- To carry out wealth screening: we may use information gathered about you from certain third party private sources and/or publicly available sources such as social networking sites (for example, LinkedIn, Facebook, Twitter, the edited version of the electoral roll, Companies House, the Charity Commission, Who's Who, Bloomberg, Forbes to gain an insight into your philanthropic interests and your ability to support us. We might do this through wealth screening of our database. Wealth screening is a process that helps us understand how much support our school community and others might give us in terms of financial donations and other sorts of support. It helps us target our fundraising activities to generate funds more cost-effectively.

To achieve these purposes, we might share your data with a trusted service provider to help us with this work [and they might also provide us with general information about you.

Processing activities that we undertake in the course of wealth screening include: prospect research (this activity helps us learn more about a person's ability to financially support our organisation), profiling (profiling takes place when different aspects about a person such as their behaviour, interests or personality are analysed in order to make predictions or decisions about them, database segmentation (this means dividing our database of contacts up into separate groups based upon specific criteria.), tele-appending. (tele-appending is a process involving matching our current list of telephone numbers held on our contact database with an external list to check that it is up to date.)

If you object to your personal data being used for any of the above purposes, please contact the Data Compliance Lead at [datacompliance@prepschooltrust.org](mailto:datacompliance@prepschooltrust.org). You can also speak to them by contacting them on 01865 390720 or write to them (marked for the Data Compliance Lead's attention) to 7, Cothill, Abingdon OX13 6JN.

### **How long we keep your information**

We will only retain your personal data for as long as is necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting or reporting requirements.

Information relating to unsuccessful applications for admission from prospective parents is kept for 6 months and then destroyed.

We otherwise retain, subject to any proceedings or other process, your personal data in accordance with the Trust's Data Retention Policy which is available on the Trust and school website and/or on request from [datacompliance@prepschooltrust.org](mailto:datacompliance@prepschooltrust.org).

When we do delete or destroy your personal information, this is done securely.

We have a policy which explains how long we keep information. It is called a Records Retention Policy and it can be found on our website.

### **Your data protection legal rights**

Data protection law provides you with the following legal rights in certain circumstances:

- **Your right of access to your information**
  - You can ask us for a copy of your personal information. This right always applies and is sometimes called making a subject access request or SAR. There are some exceptions which means you may not always be entitled to a copy of all of your personal information that we hold.

- **Your right to rectification**
  - You can ask us to correct any information we have about you if you think it is inaccurate. You can also ask us complete information if you think it's incomplete. This legal right always applies.
  
- **Your right of erasure**
  - You can ask us to erase information about you in some circumstances although we may have good reasons why we cannot do this.
  
- **Your right to restrict our use of your information**
  - You can ask us to limit what we are doing with your information. This right only applies in certain circumstances.
  
- **Your right to object**
  - You can object to what we are doing with your information. This right only applies in certain circumstances. For example, you have the legal right to object where the legal reason we are processing your personal data is "legitimate interests" and you believe that those "legitimate interests" are outweighed by the impact to your own fundamental rights and freedoms.
  
- **Your right to withdraw your consent to the processing of your personal data**, if we are processing it on the basis of your consent. If you decide to withdraw your consent, this will not affect the lawfulness of processing of your personal data prior to the withdrawal of your consent.
  
- **Your right to data portability**
  - You can ask us to transfer your information to another organisation in a format that makes it easy for them to use. This right only applies in certain circumstances.

If you want to exercise your legal rights, please contact our School or Trust Data Compliance Lead. Their contact details can be found in the section "*How to get in touch with us*".

In most cases we have one month to respond to you but this can be extended in some cases. If we do extend the timeframe in which we have to comply with your request, we will explain why and when you can expect a substantive response.

You will not usually have to pay a fee to exercise your legal rights but there are some limited exceptions. For example, if you are making a subject access request for your personal data that we reasonably believe is excessive. If we propose to charge a fee we will tell you in advance.

You can find out more information about your legal rights in Part 2 'Data Subject Rights Policy' contained within our Data Protection Policy which can be found on our website.

In order to keep your personal data secure, we may ask for proof of your identity before we can process your request. We will only do this if it is reasonable to do so.

### **Your duty to tell us about changes to your personal information**

It's important that the personal data we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us. For example, if your address or telephone number changes.

### **Your right to complain**

The Trust has exceptionally high standards when it comes to your personal information. If we fail to meet those standards please contact our Data Compliance Lead. Their contact details can be found in the section "*How to get in touch with us*".

If you are not happy with our answer to your complaint then you can complain to the Information Commissioner's Office:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

### **Cookies**

This section applies to a situation in which you are using parts of the school or Trust's website <https://www.prepschoolstrust.org/>.

Cookies are small text files that are downloaded and sometimes stored on your device when you visit a website. Cookies are often used in order to make a website work, but may also be used to provide information to the owners of the website, and help users to navigate the website more effectively.

Cookies help us make the website better for you and for others. Our site uses cookies in order to provide you with some of our content, to keep you logged in as you use our website, to help you navigate our website, to monitor the website's performance].

You can find out more about how we use cookies and the types of cookies that we use by visiting our Cookie Policy on our [website](#).

### **Links to other Websites**

Our website contains some links to websites of other organisations. We do not control these websites and this Privacy Notice does not cover how those other organisations use your personal information. When you leave our website, we recommend that you read the Privacy Notice of the other websites you are visiting.

### **Changes to our Privacy Notice**

We will update and change this Privacy Notice from time to time to keep it up to date and accurate. We will always publish the most up to date version on our website. If we make a substantial change that affects your rights, we will notify you of the change as far as it is practicable to do so, usually by email.