



## Windlesham School – Privacy Notice

### Parents Carers and Guardians

#### Introduction

This notice is for parents, carers, and guardians of current or prospective pupils to help you understand how and why we collect personal information and what we do with that information. If you have any questions about this notice or have any concerns about the information we hold please contact the Bursar (whose contact details you will find on our website). You can also ask us for a copy of our Data Protection Policy.

As well as holding personal information on you, the school will also hold personal information your child. This notice is addressed to you in relation to the personal information we hold on your child because you are able to exercise your child's data protection rights on their behalf. Where relevant references to you include your child.

#### The type of personal information we hold

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. CCTV, photos and video recordings of you are also personal information.

Information that we have collected about you, but which has been rendered anonymous in such a way that you are not (or are no longer) identifiable is not personal information.

Other personal information we may hold includes the following:

- We may have information about any family circumstances which might affect your child's welfare or happiness.
- We will need to certain medical information about your child (such as allergies), and whether they require additional support with certain activities. This is to safeguard their welfare and provide appropriate pastoral (and where necessary, medical) care, including in the event of an emergency.



- We may receive information about you from your child, spouse, prior spouse, partner or prior partner or another individual.
- We may take photographs or videos of you at school events to use on social media and on the school website. This is principally to show prospective parents and pupils what we do here and to advertise the school. We may continue to use these photographs and videos after your child has left the school.
- We will also hold and 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).
- We may hold information about bankruptcy petitions and statutory demands.
- We may search the files of any licensed credit reference agency in order to verify your identity. This also allows us to assess your application for the award of a bursary or other help with fees.

## Why we hold personal information

The school relies on legitimate interests for most of the ways it uses your information. We will also use your information to perform our obligations under our contract with you. This will include names and contact details. Most of the personal information we hold and process of that information is provided to us directly by you for one of the following reasons:

- Providing educational services to your child.
- Efficient admissions operations for prospective pupils.
- Safeguarding and promoting the health and welfare of your child, pupils, staff and others with whom you come into contact.
- 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.
- Facilitating the efficient operation of the school.
- Ensuring that all relevant legal obligations of the school are complied with (for example in relation to the retention of financial records for HMRC purposes).
- To track patterns of applications over periods of time, to facilitate efficient admissions and marketing processes.

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.



We might also need to use your information in order to comply with a legal obligation for example, to the courts, local authority or the police or in the public interest to safeguard and promote the welfare of your child.

The basis that we will rely on for a particular purpose may vary depending on the circumstances. For example, if we decide to tell the local authority something about a parent for safeguarding reasons, sometimes this will be because we have a legal obligation to do so but on other occasions we may tell the local authority because we are worried about the child even if we don't have a legal obligation to report something (in which case we would be relying on legitimate interests and public interests).

We may ask for your consent to use your information in certain ways as an alternative to relying on any of the bases above. For example, we may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on legitimate interests. If we ask for your consent to use your personal information you can take back this consent at any time.

## We may share your information

In accordance with our legal obligations, we may share information with local authorities, inspectorates and the Department for Education, for example, where we have any safeguarding concerns.

On occasion, we may need to share information with the police.

We may also need to share information with our legal advisers for the purpose of obtaining legal advice.

We may also share information with:

- Virtual IT – provider of technical IT support to the school.
- “Engage” – provider of the School’s Management Information Systems
- Microsoft – using “Teams” software for distance learning
- Innovate Food Group provider of catering services to the school
- Mediabase – our electronic entry system
- “Friends Of Windlesham” – Parent/Carers Association– pupil name plus email only with opt out available
- “Google” – pupil names only - provider of email accounts for pupils to use internally
- Examination Boards – pupil names and dates of birth only



- External Providers of after- school clubs such as tennis and basketball
- External competition organisers EG Swimming Galas
- Providers of Residential Trips. This might include information outside of the UK for overseas trips
- 15<sup>th</sup> Media - digital marketing creators and consultants.
- MyConcern - safeguarding records.

We may share information with caterers or organisers of trips or events connected with the school who, for example, may need your contact details and be made aware of any dietary or medical needs.

If you have unpaid fees while your child is at the school we may share information about this with debt recovery suppliers and other schools or educational establishments to which you intend to send your child.

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 reasons.

## How we store your information and for how long

Information on how long we hold personal information for us set out in our Data Protection Policy available on our website.

In all cases, the school will retain personal data securely and only in line with how long it is necessary to keep for a legitimate reason.

Information which has been rendered anonymous in such a way that you are not (or are no longer) identifiable is not personal data and may be retained indefinitely.

## Your data protection rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal information.

**Your right to rectification** - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.



**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

**Your right to object to processing** - You have the the right to object to the processing of your personal information in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at if you wish to make a request.

The school will update this Privacy Notice from time to time. You are recommended to look at it at the start of every school year.

## How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at 190 Dyke Road, Brighton BN1 5AA

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>