



Godolphin School
Privacy Notice for Parents

September 2018



Introduction

1. This notice is to help you understand **how** and **why** we collect personal information about you and **what** we do with that information. It also explains the decisions that you can make about your own information. The notice applies to all parents of prospective, current and past pupils at the School and should be read as appropriate depending on which category applies to you. It also applies to any personal information about you held by the Godolphin Parents Association (GPA) and/or the Friends of Godolphin Prep (FOGP) and again should be read accordingly where appropriate. References to “parents” include guardians where applicable.
2. If you have any questions about this notice or your data protection rights, please contact the School’s Privacy Officer, whose contact details are set out at the end of this notice.

What is “personal information”?

3. Personal information is information that identifies you as an individual and relates to you. This includes your name, contact details, next of kin and financial information. We may also hold information such as your religion or ethnic group. CCTV, photos and video recordings of you are also personal information.

How and why do we collect and use personal information?

4. The School's primary reason for using your personal information is to provide educational services to your daughter. The GPA's and/or FOGP's primary reason for using your personal information is to assist the School in providing those services by developing effective relationships between staff, parents and others and engaging in activities and providing facilities which support the School and advance the education of the pupils.
5. Set out below are examples of the different ways in which we use your personal information and where this personal information comes from:
 - We obtain information about you from registration and admissions forms and from your daughter's previous school. We may also get information from professionals such as doctors and from local authorities.
 - We may have information about any family circumstances which might affect your daughter's welfare or happiness, so that we can provide appropriate care and support to your daughter.
 - We will need information about any court orders or criminal petitions which relate to you, so that we can safeguard the welfare and wellbeing of your daughter and the other pupils at the School.
 - We will use your information in connection with any complaint or grievance made to the School which involves you.
 - We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as toilets and changing rooms.

- We may take photographs or videos of you at School events to use on social media and on the School website. This is to show prospective and current parents and pupils what we do here and to advertise the School. We may continue to use these photographs and videos after your daughter has left the School.
- We will send you information to keep you up to date with what is happening at the School, for example by sending you information about events and activities taking place and the School weekly bulletins.
- We may send you details of ways in which you can support the School, the GPA and/or FoGP such as volunteering.
- We may use your information to facilitate interaction between members of the School community.
- We may send you information about ways in which you can provide financial support to the School, including making donations to the School, specific fundraising campaigns and requests for sponsorship. In connection with this, we will hold details of any donations made and your Gift Aid status if applicable.
- We will keep your contact details after your daughter leaves the School so that we can continue to send you information about the School.
- We may use information about you if we need this for historical research, for example in connection with a book about the School, or for statistical purposes.
- We may use your information when ensuring network and information security, for example our anti-virus software might scan files containing information about you.
- We will hold details of any dietary requirements for catering purposes that you may have provided and of any disability of which you may have notified us so that we can make reasonable adjustments for you.

Financial information

- 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 daughter's previous school(s).
- We will hold information about bankruptcy petitions and statutory demands where relevant.
- 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 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. This record will be seen by other organisations which make searches about you.

- We will obtain information about you from publicly available sources, such as Companies House, to assess your ability to pay School fees.
- We may use a third party organisation to assist us with our bursary application process: if you apply for a bursary we may share information about you with that third party so that we can assess your application.
- We may share your information with debt recovery suppliers if you do not pay any fees owed by you to the School.

Failure to supply information may result in a refusal of an award or credit. We will contact you for the above purposes by email, telephone, post or text message but we will only do this where we are allowed to do so under data protection law (for example we will usually need your consent before sending you an email about a fundraising opportunity). If you tell us that you do not want to be contacted for any of these purposes, then we will of course respect that.

If you wish to make a donation, particularly one of substantial value, we may need to verify your identity and/or carry out financial due diligence on you. This may involve taking and retaining copies of your identification documents and obtaining your personal information from publicly available sources. This is to comply with our legal obligations.

Sharing personal information with third parties

- We will share information with local authorities, the Independent Schools Inspectorate and the Department for Education in accordance with our legal obligations, for example where we have any safeguarding concerns or, if applicable, in connection with any Statement of Special Educational Needs or Education Health and Care Plan affecting your daughter.
- In specific instances, we may need to share information about you with the police for safeguarding purposes, the prevention and investigation of crime and the prosecution of offenders.
- We may need to share information about you with the Health and Safety Executive if there is a relevant issue at the School.
- We may need to share information about you with our legal advisers for the purpose of obtaining legal advice.

- We will use consultants, experts and other advisers, such as our accountants or IT consultants or third party cloud computing services, to assist the School in fulfilling its obligations and to help run the School properly. We may need to share your information with them if this is relevant to their work.
- If your daughter is not of British nationality, we have to make sure that your daughter has the right to study in the UK. We may be asked to provide your information to the relevant authorities as part of our reporting requirements and we may have to provide information about you to UK Visas and Immigration to comply with our duties as a Tier 4 sponsor.
- The School is a registered charity, which means that in some circumstances, such as a serious incident, we may need to share your information with the Charity Commission.
- We may share information about you with our insurers, for example where there is a serious incident at the School.
- If you have unpaid fees, we may share information about this with other schools or educational establishments to which you intend to send your daughter.
- If your daughter leaves us to attend another school we may provide that school with information about you, for example details of family circumstances if there have been any safeguarding issues.
- We may share information about you with others in your family, such as another parent or step-parent, for example where this is part of our obligation to take care of your daughter as part of our wider legal and regulatory obligations, or in connection with School fees.
- We may need to share information about you if there is an emergency, for example if you are hurt whilst on School premises.
- If you have appointed an agent to act on your behalf, we may share information with that agent.
- We may send you information about the School, such as the School prospectus, before you accept a place for your daughter.
- In connection with your attending events we may share your information with any event booking platforms.
- We may share information about you with the Old Godolphin Association, the GPA and/or FoGP and, in connection with any support and development activities, The Godolphin Foundation (registered charity no 1168399).

- The GPA and/or FoGP may share information about you, such as your name and contact details, with other parents for the purposes of carrying out their respective functions.

Our legal bases for using your information

6. This section contains information about the legal bases that we are relying on when handling your information.

Legitimate interests

- In most cases, the School is using your information when this is necessary for its legitimate interests, except when your interests and fundamental rights override those legitimate interests.

Specifically, the School has a legitimate interest in:

- providing educational services to your daughter and to other pupils;
 - safeguarding and promoting the welfare of your daughter, other pupils and our employees;
 - promoting the objects and interests of the School. This includes fundraising and using photographs of you at 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 information in connection with legal disputes, for example in the case of you or your daughter making a claim against the School;
 - protecting the School's reputation;
 - facilitating the efficient operation of the School;
 - ensuring that all relevant legal obligations of the School are complied with, for example in relation to inspections;
 - ensuring that there is an active community of supporters which will benefit the School and members of the School community and
 - using your personal information to administer our events.
- 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.
- The GPA and/or FoGP are using your personal information when this is necessary for their respective legitimate interests, being specifically to advance the education of

pupils in the School by developing effective relationships between staff, parents and others associated with the School and engaging in activities or providing facilities or equipment which support the School and advance the education of the pupils.

Our contract with you

- 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 daughter's progress and so that we can contact you if there is a concern.

Legal obligation

- We may need to use your information in order to comply with a legal obligation, for example to report a safeguarding concern to the appropriate authorities. We may also need to disclose your information to third parties such as the courts, the local authority or the police, where legally obliged to do so.

Vital interests

- We may need to use your information where this is necessary to protect the vital interests of you or any other person, for example to prevent death or serious injury.

Public interest

- The School considers that it is acting in the public interest when we use your information for example in providing education to your daughter, safeguarding and promoting the welfare of you, your daughter and other pupils, facilitating the efficient operation of the School and ensuring that we comply with all our legal obligations.

Special categories of information

- The School is also required to comply with an additional condition where it processes special categories of personal information, including 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. The School's grounds for using information of this nature will depend on the circumstances and may include the following:
 - a) This is necessary for reasons of substantial public interest, including employment, social protection and social security laws.
 - b) This is necessary to protect the vital interests of any person, for example if they are seriously hurt.

- c) This is necessary in relation to legal claims. This allows us to share information with our legal advisers and insurers.
- d) This is necessary for medical purposes including medical treatment and the management of healthcare services.

Criminal offence information

We may only use information relating to criminal convictions and offences where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations or exercise our rights. Less commonly we may use information relating to criminal convictions and offences where it is necessary in relation to legal claims where it is necessary to protect our pupils and you are not capable of giving your consent, or where you have already made the information public.

More than one basis

In some cases, we will rely on more than one basis for a particular use of your information. In addition, we may move from one legal basis to another as circumstances change. For example, as a safeguarding matter becomes more serious, we may start to rely on legal obligation to share personal information with the local authority in addition to the other legal bases which are noted for safeguarding purposes.

Consent

Sometimes we may ask for your consent to use your personal information in certain ways. If we ask for your consent to use your information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. Please contact the School's Privacy Officer if you would like to withdraw any consent that you have given.

Sending your information to other countries

- 7. We will not send your information to other countries which do not have the same level of protection for personal information as there is in the UK or the EU, unless you ask us to communicate with you overseas, e.g. when you are on holiday or live overseas, or otherwise give your specific consent.

For how long do we keep your information?

- 8. The School will keep information about you for as long as we need to in order to educate and look after your daughter. We will keep some information after your daughter has left the School, for example so that we can find out what happened if you make a complaint.
- 9. We will also need to retain your contact details for so long as you want to be part of the School community, so that we can communicate with you.



10. In exceptional circumstances we may keep your information for longer than usual but only if we have a good reason and are allowed to do so under data protection law. We may keep information about you for a long time or even indefinitely if we need this for historical, research or statistical purposes or as part of our wider legal and regulatory obligations.
11. The GPA and/or FoGP will keep information about you only for as long as your daughter is at the School and for not more than one year afterwards.

What decisions can you make about your information?

12. You have a number of additional rights regarding your personal information, some of which are new whilst others build on your existing rights. These rights are as follows:
 - **Rectification:** if information the School holds about you is incorrect you can ask us to correct it;
 - **Access:** you can ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to;
 - **Deletion:** you can ask us to delete the information that we hold about you in certain circumstances, for example where we no longer need the information;
 - **Portability:** you can request the transfer of your information to you or to a third party in a format that can be read by computer. This applies where (a) the information has been supplied by you, (b) the basis that we are relying on to process your information is consent or contract and (c) the information is being processed by us on computer;
 - **Restriction:** our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate, we can only use it for limited purposes while we check its accuracy.
 - **Objection:** you may object to us using your information where (a) we are using it for direct marketing purposes, (b) the basis on which we are relying is legitimate interests or public interest and (c) we are using it for historical or scientific research or archiving purposes.

Further information and guidance

13. The School's Privacy Officer is the person responsible at the School and the GPA/FoGP for managing how we look after personal information generally and deciding how it is shared.
14. Like other organisations, we need to keep your information safe and 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.
15. This privacy notice does not and is not intended to give you any rights which you do not already have. For example, it does not give you any additional contractual rights.

16. Please speak to the Privacy Officer if:

- You object to us using your information for marketing purposes. We will stop doing so if you tell us not to; or
- You would like us to update the information we hold about you; or
- You would prefer that certain information is kept confidential.

17. If you fail to provide certain information when requested, we may not be able to perform our obligations under any contract that we have entered into with you. We may also be prevented from complying with our legal obligations, such as to ensure the welfare of your daughter and other pupils.

18. If you consider that we have not acted properly when using your personal information, you can contact the Information Commissioner's Office (ico.org.uk).

19. The School's Privacy Officer's contact details are:

Godolphin School
Milford Hill
Salisbury
SP1 2RA

Email: privacy@godolphin.org

Tel: 01722 430500

