



Godolphin School

Privacy Notice for Parents of Younger Pupils

September 2018



Introduction

1. This notice is to help you understand **how** and **why** we collect your daughter's personal information and **what** we do with that information. It also explains the decisions that you can make about your daughter's information. The notice applies to all prospective and current pupils and should be read as appropriate depending on which category applies to your daughter. References to "parents" include guardians where applicable.
2. We are giving you this notice because you are able to exercise your daughter's data protection rights on her behalf. When your daughter is older (usually when she reaches the age of 12) she will be considered mature enough to exercise her own data protection rights.
3. If you have any questions or concerns about this notice or your daughter's data protection rights, please talk to the School's Privacy Officer, whose contact details are set out at the end of this notice.

What is "personal information"?

4. Personal information is information that the School holds about your daughter and which identifies her as an individual and relates to her. This includes information such as her name, date of birth and address as well as things like exam results, medical details and behaviour records. We will also hold information such as your daughter's religion or ethnic group. CCTV, photos and video recordings of your daughter are also personal information.

How and why does the School collect and use personal information?

5. The School's primary reason for using your daughter's information is to provide her with an education. The School will also use your daughter's personal information to safeguard and promote your daughter's welfare and the welfare of others, for example so that we can look after your daughter if she is hurt.
6. Set out below are examples of the different ways in which we use personal information and where this personal information comes from.
7. Registration and admissions forms which you complete give us personal information about your daughter and we get information from your daughter, her teachers and other pupils. Your daughter's old school also gives us information about how well she did and any difficulties that she had, so that we can teach and care for her.
8. Sometimes we get information about your daughter from her doctors and other professionals where we need this to look after her.
9. The following are examples of how we use your daughter's information:
 - 9.1. We will use information about your daughter during the admissions process, e.g. when marking entrance papers and considering any information provided on the registration form. We may let your daughter's previous school know if she has been offered a place at the School.
 - 9.2. We need to tell all appropriate members of staff if your daughter has a health issue, including mental health, or if she has special educational needs or requires extra help with some tasks.

- 9.3. We will need to share information about your daughter (e.g. about her health and wellbeing) with the School Health Centre, doctor or counsellor.
- 9.4. If we have information that your daughter suffers from an allergy we will use this information so that we can look after her.
- 9.5. If we have information that your daughter suffers from a disability, we will use this information to provide appropriate support.
- 9.6. We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as toilets or changing rooms.
- 9.7. We record your daughter's attendance and, if she has time away, we record the reasons why.
- 9.8. We will need to report some of your daughter's information to the government and we will need to tell the local authority that she attends the School or if she leaves and also let them know if we have any concerns about her welfare.
- 9.9. We are legally required to provide the Department for Education with certain information about your daughter. Some of this information will be stored on the National Pupil Database. Organisations can request information from the National Pupil database which includes information about your daughter, but they are only allowed to do this for limited purposes and they must be very careful about how they use her information. More information can be found here:
<https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.
- 9.10. We may need to share information about your daughter with the Health and Safety Executive (a government body) if there is a health and safety issue at the School.
- 9.11. The School is a charity, which means that we may need to share your daughter's information with the Charity Commission which checks how we are behaving as a charity.
- 9.12. When we are inspected by the Independent Schools Inspectorate, we will have to make your daughter's information available to the inspectors to assist them with their inspection.
- 9.13. If the School receives a complaint or grievance which involves your daughter, we will need to use her information to deal with this appropriately.
- 9.14. If applicable, the School may share information about your daughter with the local authority for the purpose of preparation, implementation or review of any Statement of Special Needs or Education Health and Care Plan.
- 9.15. We will need information about any court orders or criminal petitions which relate to your daughter. This is so that we can safeguard her welfare and wellbeing and the other pupils at the School.
- 9.16. If your daughter is from another country, we have to make sure that she has the right to study in the UK. Sometimes the government will ask us to provide information about her

as part of our reporting requirements. In addition, we have a duty to provide information about your daughter to UK Visas and Immigration.

- 9.17. Depending on where your daughter will go when she leaves us, we will provide her information to other schools and colleges. For example, we will share information about your daughter's exam results and provide references.
- 9.18. If your daughter leaves us at a non-standard transition point, we will need to provide Wiltshire Council with her personal details, including her new school, to ensure the continuity of her education.
- 9.19. If your daughter has a safeguarding file, we are legally required to pass this file to her next school.
- 9.20. If your daughter takes public examinations, we will need to share information about her with examination boards, for example if she requires extra time in exams.
- 9.21. We may need to share information with the police or our legal advisers if something goes wrong or to help with an enquiry, for example if one of your daughter's fellow pupils is injured at School or if there is a burglary.
- 9.22. We use consultants, experts and other advisers to assist the School in fulfilling its obligations and to help run the School properly. We will share your daughter's information with them if this is relevant to their work.
- 9.23. If your daughter's behaviour merits it, we may need to share your information with the police and we may need to use information about the action taken by the police.
- 9.24. We may share some information with our insurance company to make sure that we have the insurance cover that we need.
- 9.25. If you have appointed an agent to act on your behalf during the admissions process, we may share information about your daughter with the agent. For example, we may send them the acceptance letter so that they can pass this on to you.
- 9.26. We will share your daughter's academic and (where fair) her behaviour records with you (or where appropriate her guardian) so you can support her schooling.
- 9.27. We will monitor your daughter's use of email, the internet and mobile electronic devices e.g. iPads. In certain circumstances, we will look at the content of her communications, such as emails and text messages. We monitor and look at her use of technology, including her phone, to check that she is using this technology responsibly and is not putting herself at risk of harm or for other good reasons. If you would like more information about this, you can refer to the Online Safety Acceptable Use Policy which applies to your daughter or speak to her Head of Year.
- 9.28. We may use photographs or videos of your daughter for the School's website and social media sites or prospectus to show prospective 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. Sometimes we use photographs and videos for teaching purposes, for example to record a drama lesson.

- 9.29. We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing.
- 9.30. We must make sure that our computer network is working well and is secure. This may involve information about your daughter, for example our anti-virus software might scan files containing information about her.
- 9.31. We sometimes use contractors to handle personal information on our behalf. For example, we may use IT consultants who might access information about your daughter when checking the security of our network and we may also use third party “cloud computing” services to store some information away from the School site.
- 9.32. We may sometimes use a third party to provide activities such as an external sports coach. We may share information about your daughter, for example to tell them what sports she is good at.
- 9.33. We will keep details of your daughter’s address when she leaves so we can send her magazines, newsletters and other publications and find out how she is getting on. We will also pass her details onto the Old Godolphin Association, further information on which can be found here: <http://godolphincommunity.org/>
- 9.34. We will only share your daughter’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.
10. If you have any concerns about any of the above, please speak to your daughter’s Head of Year.

Our legal bases for using your daughter’s information

11. This section contains information about the legal bases that we are relying on when handling your daughter's information.

11.1. Legitimate interests

This means that the processing is necessary for the School’s or someone else’s legitimate interests, except where your daughter’s interests and fundamental rights override our legitimate interests. The School relies on legitimate interests for most of the ways in which it uses your daughter's information.

Specifically, the School has a legitimate interest in:

- providing your daughter with an education and making sure that she is behaving properly;
- complying with our agreement with you for your daughter to be at the School;
- looking after your daughter, her fellow pupils and our staff;
- keeping the School buildings safe;
- making sure that the School is well managed and that we protect the School’s reputation;

- telling people about the School and what we do here;
- ensuring that all relevant legal obligations of the School are complied with;
- using your daughter's information in connection with legal disputes;
- continuing to improve the School (e.g. if we want to raise funds for new buildings and facilities).

In addition, your daughter's personal information may be processed for the legitimate interests of others. For example, we may use information about your daughter when investigating a complaint made by another pupil.

If you object to us using your daughter's information where we are relying on our legitimate interests as explained above, please speak to your daughter's Head of Year.

11.2. Legal obligation

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

11.3. Vital interests

We may need to use your daughter's information to protect the vital interests of your daughter or any other person, for example to prevent death or serious injury.

11.4. Public interest

The School considers that it is acting in the public interest when we use your daughter's information in order, for example, to provide her and others with an education, safeguard and promote her welfare and that of her fellow pupils, facilitate the efficient operation of the School and to ensure that we comply with our legal obligations.

11.5. Special categories

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, genetic information, biometric information, health information, and information about sex life or orientation. The School's grounds for processing information of this nature will depend on the circumstances and may include the following:

- 11.5.1. When this is necessary for reasons of substantial public interest, including employment, social protection and social security laws.
- 11.5.2. When this is necessary to protect the vital interests of any person where that person cannot give consent, for example if they are seriously hurt or are unconscious
- 11.5.3. When this is necessary in relation to legal claims. This allows us to share information with our legal advisers and insurers.
- 11.5.4. When this is necessary for the purposes of medical treatment and the management of healthcare services.

11.6 Criminal offence information

In exceptional circumstances, we may use information about criminal convictions or offences. We will only do this where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations, to exercise our rights or to look after pupils.

11.7 More than one basis

In some cases, we will rely on more than one basis for a particular use of your child's 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.

11.8 Consent

Sometimes we may ask for your consent to use your daughter's information in certain ways. If we ask for your consent to use her personal information you can take back this consent at any time. Any use of your daughter's information before you withdraw your consent remains valid. Please speak to your daughter's Head of Year if you would like to withdraw any consent given.

Sending information to other countries

12. We will not send your daughter's 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, such as for a school trip.

For how long do we keep your daughter's information?

13. We keep your daughter's information for as long as we need to in order to educate and look after her. We will keep certain information after your daughter has left the School, for example so that we can find out what happened if you make a complaint.

14. We will also need to retain your daughter's contact details so that we can send her information about what is happening at the School and about ways in which she can support the School (including fundraising).

15. In exceptional circumstances we may keep your daughter's information for longer 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.

16. We can keep information about your daughter for a longer time or even indefinitely if this is needed for historical, research or statistical purposes or as part of our wider legal and regulatory responsibilities.

What decisions can you make about your daughter's information?

17. Your daughter has a number of other rights regarding her information, some of which are new rights whilst others build on her existing rights. These rights are as follows:



