



PRIVACY NOTICE FOR PARENTS
OF CHILDREN AT THE SCHOOL
OR APPLYING TO JOIN THE SCHOOL

This notice is intended to provide information about how and why West House School collects and uses personal data about you and your child. It also explains the decisions that you can make about your own information.

What is personal data?

Personal data is information that identifies you as an individual, along with your child. It includes the following:

Parents and Pupils

- Personal contact information, such as names, addresses, telephone numbers, e-mail addresses and other contact details;
- Correspondence with and concerning pupils and parents, past and present
- Where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- Special category information, such as, ethnicity, language, nationality, country of birth.
- Images of pupils (and occasionally other individuals) engaging in school activities, and images captured by the school's CCTV system (in accordance with the school's policy on taking, storing and using images of children).

We will always ask for your consent to use images of you or your child and you may withdraw this consent at any time.

Pupils: past, present and prospective;

- Birth certificate on entry into EYFS
- Admission and attendance information, recording absences and lateness
- Assessment data, such as baseline information, classwork, tests and examinations, marks for homework and external examination data including results.
- Medical and health care information.
- Information relating to Special Educational Needs and Disabilities (SEND).
- Pastoral information relating to behaviour and safeguarding to ensure the provision of appropriate levels of pastoral care.
- Next school destinations

- References given or received by the school about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils.

Parents:

- Bank details and other financial information, for the process of the payment of school fees to the school;
- Occupational information collected on the school's admission entry form.

The privacy notice applies alongside any other information the school may provide about the particular use of personal data, for example when collecting data via an online or paper form.

This notice applies in addition to the school's Standard Terms and Conditions, admission forms and other relevant policies including:

- any contract between the school and the parents of pupils;
- The school's policy on taking, storing and using images of children;
- the school's CCTV policy;
- the school's retention of records policy;
- the school's safeguarding, pastoral, or health and safety policies including those concerning how concerns or incidents are recorded; and
- the school's ICT policies, including its Acceptable Use Policy, E-Safety policy, including WiFi policy, Remote Working policy and Bring Your Own Device policy.

How and why does the school collect personal data?

We obtain information about you and your child from the school's admission forms and your child's previous school or nursery setting. This may also include information from local authorities or your child's doctor. This data will be processed for the purpose of responding to your request for information about joining the school. The data the school holds will be the minimum it requires to form and maintain the contract between you and the school.

Generally, the school will receive personal data from you directly. This may be in via a form, or simply in the ordinary course of interaction or communication such as email.

In order to carry out its everyday duties to pupils and parents, the school needs to process a wide range of personal data about current, past and prospective pupils or parents as part of its daily operation.

Some of the activities the school will need to carry out in order to fulfil its legal rights, duties or obligations – including those under the school's Standard Term and Conditions.

The school's primary reason for using your child's personal information is to provide an education and to support learning. We will use your child's data to monitor and report on progress, to provide appropriate medical care, and to safeguard and promote the welfare of your child. We assess how well the school as a whole is doing and we ensure that all relevant legal obligations of the school are complied with.

The school expects that the following uses will fall within that category of its (or its community's) "**legitimate interests**":

- For the purposes of pupil selection and to confirm the identity of prospective pupils and their parents;
- To provide education services, including musical education, physical training or spiritual development, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Maintaining relationships with alumni and the school community, including direct marketing or fundraising activity;
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax or diversity);
- To enable relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate;
- To give and receive information and references about past, current and prospective pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the school;
- To safeguard pupils' welfare and provide appropriate pastoral care;
- To monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's ICT: acceptable use policy;
- To make use of photographic images of pupils in school publications, on the school website and (where appropriate) on the school's social media channels in accordance with the school's policy on taking, storing and using images of children;
- For security purposes, including CCTV in accordance with the school's CCTV policy;
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.
- For fundraising, marketing, or promotional purposes. We may keep your contact details when your child leaves the school so that we can keep in touch via the West House Old Boys Association and transfer leavers on the WHOBA Alumni Database which is currently run by the school.

In addition, the school will on occasion need to process special category personal data this may relate to health, ethnicity, religion, or criminal records information in accordance with rights or duties imposed on it by law, including as regards safeguarding or from time to time by explicit consent where required. These reasons may include:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs;

- To provide educational services in the context of any special educational needs of a pupil;
- To provide spiritual education in the context of any religious beliefs;
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are SEN, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.
- We may need information about any court orders or criminal petitions which relate to you.
- We may have information about family circumstances which might affect your child's welfare.

Financial information

We will process financial information about you in relating to the payment of fees.

Sharing personal data with third parties

During normal and occasional activities in the course of the school day we routinely share personal data with:

- Other educational establishments, which a pupil may have attended prior to joining the school or may attend after leaving the school;
- The Department of Education (DfE);
- The Independent School Inspectorate (ISI);
- The Qualification and Curriculum Authority (QCA);
- Ofsted;
- The Independent Schools Council (ISC);
- The Department of Health and Primary Care Trusts;
- The West House Old Boys' Association;
- Professional advisers;
- Other government authorities (HMRC, the police);
- The Charity Commission;
- The Information Commissioner.

For the most part, personal data collected by the school will remain within the school, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- medical records held and accessed by the school nursing team, or otherwise in accordance with express consent; and
- pupil pastoral records and/or safeguarding files.

We may also share some information with the appropriate people if your child is allergic to something or needs help with some tasks. This would include staff at school as well as external organisations, for instance whilst out on a trip or outdoor activity. Or to provide

Special Educational Support (SEN). We may need to share information with a Health care service provider. We would do this to ensure the wellbeing of your child.

Parents and pupils are reminded that the school is under duties imposed by law and statutory guidance (including **Keeping Children Safe in Education**) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO or police. For further information about this, please view the school's Child Protection Safeguarding Policy.

On occasion we may need to share information with the police or the school's legal advisers or insurance company. We would do this if an incident or accident had occurred or to help with an inquiry.

Or if your child leaves West House to attend another school we may need to provide that school with information about your child and possible family circumstances. We would pass this information on to meet safeguarding requirements.

We may share information for the purpose of international trips that the school organises, should this be envisaged for your child, we will contact you for your consent. If required your consent will be limited in time and content.

Also, if fees remain outstanding on your child's account we may share this information with external agencies to assist in the recovery of funds.

Some of the school's processing activity is carried out by third parties, such as IT systems, web developers, or cloud storage. The school has assurances from these organisations that they operate in accordance with Data Protection Law.

It is not necessary for your data to be shared with other countries. The exception to this will be international trips that the school organises, should this be envisaged for your child, you will be contracted for your consent, the consent will be limited in time and content if it be required.

How we store personal data?

We need to keep your personal data safe and up to date and accurate as possible. We will only keep it for a legitimate and lawful reason. We will only retain your information for as long as we need in order to educate and take care of your child and we will destroy it when we no longer need it. .

Some information held on your child records will be archived after your child has left the school. The retention period will depend on the type of information. In some circumstances it may be necessary for us to keep your information for a longer period than we would usually or to share it more widely than we would normally practice.

The retention period for pupil data will be until the pupil reaches the age of 25, or longer if this is adapted by any other legal obligation the school finds itself under.

The school's Retention periods policy provides further details of the timescales the school stores your information.

What decisions can be made about your information?

Under data protection legislation parents have the right to request access to the personal information we hold.

You can ask us to change or update the information we hold about your child if it is irrelevant or inaccurate. You can also ask what information we hold about your child.

You have the right to withdraw your consent to data processing at any time. However, this will only apply to certain groups of data for which you have given particular consent. This may be that you wish to inform us if you would prefer for your child not to have their photo or video used of publicity, or to be featured on the school website, social media, or newsletters.

Further information and guidance

This notice explains how we look after personal information. For more information, please see the full privacy notice which is available to view via the school's website.

If you have any concern relating to any aspect of this notice you can contact the Bursar to answer any questions you may have in the first instance.

If you believe that the school has not complied with this policy or acted properly in accordance with Data Protection Law, you should utilise the school's complaints procedure and also notify the Headmaster or Bursar. The Information Commissioner's Office (ICO) can also be contacted. Although the ICO does recommend that steps are taken to resolve the matter with the school before involving the regulator. The ICO telephone number is: 0303 123 1113.

We will obtain the information the school requires from you, should we need further information from other sources we will contact you within a month.

We see the provision of personal data as necessary to properly admit your child to West House School and to administer, and for the school to fulfil its obligations under the school's Standard Terms and Conditions when a pupil joins our community.

There is no automated decision making or profiling involved in this data stream into and through the school.

Implemented: May 2018

Review: May 2019

