



The Children's House

How We Use Your Information Privacy Notice for Pupils

This policy should be reviewed annually and as required by legislation.		
Action	Reviewer	Date
Review	AS	Apr 2025
Approved by Chair of COM	DD	Apr 2025
Date for next internal review		Apr 2026

Pupil Privacy Notice - Key Information for parents of younger pupils

This notice contains the key information about how and why we collect a pupil's personal data and what we do with that information.

Personal data is information that identifies each pupil as an individual and relates to a child. For example, information about how a pupil is progressing at School and any information that we need to take care of them. Photographs and videos of a pupil also counts as their personal data.

You can obtain a copy of the privacy notice by visiting our website.

The School uses a pupil's personal data in order to:

- Teach them and our other pupils;
- Look after each pupil and others, such as other children;
- Monitor the behaviour of each pupil and others and to take action where appropriate;
 - Enable the School to comply with its legal obligations, to assist the School regarding the management and operation of the School and to advance and protect the School's interests, objects and reputation; and
 - Fundraise, market and promote the School. For example, by using photographs of our pupils in the School prospectus, on the School's website or in social media.

We set out below examples of the different ways in which we use each pupil's personal data and where that personal data comes from.

- Admissions forms give us a lot of personal data about each pupil. We get information from parents, a child's teachers and other pupils. Upon admission, a pupil's old school also gives us information about them so that we can teach and care for them.

- Sometimes we get information from a pupil's doctors and other professionals where we need this to look after them, including other schools and local authorities.
- We may need to share some information about pupils with the government or in a school census (e.g. the Department for Education, the Independent School's Inspectorate, or the Independent School's Council). We will need to tell the local authority that a pupil attends the School, if they leave the School, or let them know if we have any concerns about that pupil's welfare.
- We may use photographs or videos of pupils 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 that pupil has left the School.
- Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.
- We publish our assessment 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.
- We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms or toilets, is sign posted throughout the School and is risk assessed.
- We will keep details of a pupil's address when they leave so we can keep them updated about what is happening at the School, to tell them about events and activities and find out how they are getting on.

Parents and pupils can exercise the following rights regarding the pupil's personal data:

- correction of personal data held;
- access to personal data held;
- deletion of personal data in certain circumstances;
- portability - the transfer of personal data to you or a third party;
- restriction of use of personal data; and
- the right to object to the use of personal data in certain circumstances.

These rights are explained in more detail in the full privacy notice below, and the Headteacher can give you more information.

The Data Protection Lead is the person responsible at our school for managing how we look after personal data. The Data Protection Lead can answer any questions which you may have about how we use each pupil's personal data.

What is "personal data"?

Personal data is information that the School holds about pupils and which identifies a pupil.

This includes information such as their date of birth and address as well as things like exam results, medical details and behaviour records. CCTV images, photos and video recordings of a pupil are also personal data.

Where we get pupil's personal data from and who we share it with

We obtain pupil's personal data from a number of different sources such as our teachers, parents, and a pupil's previous school and any future school, other pupils and their parents, as well as from people outside of the School such as the local authority.

We will also share information with these people and organisations.

The sections below contain further information about where we get a pupil's personal data from and with whom it is shared.

The purposes for which we use a pupil's personal data and the lawful bases

The School uses a pupil's personal data in order to:

- Teach a pupil and our other pupils;
- Look after a pupil and others, such as other pupils;
- Monitor the behaviour of a pupil and others and to take action where appropriate;
 1. Enable the School to comply with its legal obligations, to assist the School regarding the management and operation of the School and to advance and protect the School's interests, objects and reputation; and
 2. Fundraise, market and promote the School. For example, by using photographs of our pupils in the School prospectus, on the School's website or in social media.

Under data protection law, the School can only use personal data if it has a lawful basis for doing so. The lawful bases that we are relying on when handling a pupil's information are as follows:

- **Legitimate interests:** This means that the School is using a pupil's personal data where this is necessary for the School's legitimate interests or someone else's legitimate interests. Specifically, the School has a legitimate interest in educating and looking after its pupils, complying with its agreement with parents for their child to be at the School, protecting, promoting and improving the School. Legitimate interests applies to all of the 5 purposes listed above.
- **Public task:** This allows the School to use personal data where doing so is necessary in order to perform a task in the public interest. This basis applies to purposes 1, 2, 3 and 4 above. For example, we are performing a task in the public interest when we teach and look after a pupil.
- **Legal obligation:** The School might need to use a pupil's information in order to comply with a legal obligation, for example, to report a concern to Children's Services. Occasionally the School may have a legal obligation to share a pupil's personal data with third parties such as the court.

- **Vital interests:** In limited circumstances we may use a pupil's information to protect their vital interests or the vital interests of someone else. For example, to prevent someone from being seriously harmed or killed.

The section below contains more information about our purposes for using a pupil's personal data and the lawful bases.

Our purposes and lawful bases in more detail

This section contains more detail about the purposes for which a pupil's personal data is used, the applicable lawful basis or bases as well as further information about sources and recipients. It does not say anything different to what's set out above but goes into a lot more detail.

We have used a colour code system so that you can see which bases we are relying on for each of the purposes described **Error! Reference source not found.****Error! Reference source not found.**below. **LI** means legitimate interests, **PI** means public task, **LO** means legal obligation and **VI** means vital interests. So where we use **(LI, PI)** that means we are relying on both legitimate interests and public task for that purpose.

- 1 Our main reason for using a pupil's information is to provide them and other pupils with an education **(LI, PI)**.
- 2 The School will also use a pupil's personal data to safeguard and promote their welfare and the welfare of others (for example, so that we can look after pupils if they are hurt) **(LI, PI, VI)**.
- 3 We will use information about a pupil during the admissions process e.g. We may let their previous school know if they have been offered a place at the School as they have a legitimate interest in finding out how what happens to their former pupils as this will help them support their other pupils when they leave the school. The admissions forms which parents complete give us personal data about pupils such as their name, contact details, disabilities, any particular difficulties they have with work, hobbies and interests, medical information (such as information about an allergy) and family circumstances. We get information from pupils, his / her teachers and other pupils. A pupil's old school also gives us information about how well a pupil did and any difficulties they had if we need this information to teach and care for them **(LI, PI)**.
- 4 Sometimes we get information from a pupil's doctor and other professionals where we need this to look after the pupil **(LI, PI)**.
- 5 We need to tell all appropriate members of staff if a pupil has a health issue **(LI, PI)**.
- 6 We will tell a pupil's teachers if he or she has special educational needs or requires extra help with some tasks **(LI, PI)**.
- 7 We will need to share information about a pupil (e.g. about their health and wellbeing) with the School counsellor **(LI, PI, VI)**.
- 8 If we have information that a pupil suffers from an allergy we will use this information so that we can look after the pupil **(LI, PI, VI)**.
- 9 If we have information that a pupil suffers from a disability we will use information about that disability to provide support **(LI, PI)**.
- 10 Where appropriate, the School will have information about a pupil's religious or other beliefs and practices. For example, if a pupil does not eat certain foods **(LI, PI)**.

- 11 We will also hold information, such as a pupil's religion or ethnic group, for the purposes of monitoring the good progress of all ethnic groups and provide authorities such as the Independent Schools Council and the local education authority with this information in annual attainment results and census surveys. (LI, PI, LO)
- 12 We use CCTV to make sure the School site is safe. Images captured of a pupil via CCTV will be a pupil's personal data. CCTV is not used in private areas such as changing rooms (LI, PI).
- 13 We will use a pupil's personal data to take other steps to make sure the school site and buildings are safe, for example, we keep a record of who is on the school sites at any given time (LI, PI).
- 14 We record a pupil's attendance and if he or she has time away from the School we record the reason(s) why (LI, PI).
- 15 We will need to report some of a pupil's information to the government (e.g. the Department for Education). We will need to tell the local authority that a pupil attends the School, if a pupil leaves the School or let them know if we have any concerns about a pupil's welfare. The local authority may also share information with us for these reasons (LI, LO, PI).
- 16 We may need to share information about a pupil with the Health and Safety Executive (a government organisation) if there is a health and safety issue at the School (LI, LO).
- 17 The School is a charity which means that in exceptional circumstances we may need to share a pupil's information with the Charity Commission e.g. in the event of a serious incident (LI, LO, PI).
- 18 When we are inspected by the Independent Schools Inspectorate, we will have to make pupil's information available to the inspectors to assist them with their inspection (LI, LO, PI).
- 19 If the School receives a complaint or grievance that involves a pupil, we will need to use their information to deal with this appropriately. For example, if you make a complaint or if another parent complains about an issue which involves a pupil (LI, PI).
- 20 The School may share information about a pupil with the local authority for the purpose of the preparation, implementation and / or review of a pupil's Statement of Special Educational Needs or Education Health and Care Plan (LI, PI, LO).
- 21 We may use a pupil's information in connection with legal disputes (LI, PI, LO).
- 22 We are legally required to provide the Department for Education with certain information about a pupil. 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 pupils. But they are only allowed to do this for limited purposes and they must be very careful about how they use a pupil's information. More information can be found [here](#) (LO).
- 23 We will need information about any court orders or criminal petitions that relate to a pupil. This is so that we can safeguard the pupil's welfare and wellbeing and the other pupils at the School (LI, PI).
- 24 If a pupil is from another country we have to make sure that they have the right to study in the UK. Sometimes the government will ask us to provide information as part of our reporting requirements. In addition to this we have a duty to provide information about pupils to UK Visas and Immigration (LI, LO, PI).

- 25 Depending on where pupils go when they leave us we will provide their information to other schools. For example, we will share information about a pupil's exam results and provide references (LI, PI). If we hold safeguarding information about a pupil, we will share that with the pupil's next school.
- 26 If a pupil has a safeguarding file, we are legally required to pass this file to their next school (LI, LO, PI).
- 27 If a pupil takes public examinations we will need to share information about them with examination boards. For example, if a pupil requires extra time in exams (LI, PI).
- 28 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 a pupil's classmates is injured at School or if there is a burglary (LI, LO, PI).
- 29 We use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We will share a pupil's information with them if this is relevant to their work (LI, PI).
- 30 If a pupil has misbehaved in a serious way, we may need to share information with the police and we may need to use information about the action taken by the police (LI, LO, PI).
- 31 We may share some information with our insurance company to make sure that we have the insurance cover that we need or in connection with an actual or possible claim (LI, PI).
- 32 If the School is dealing with a request for information, query, complaint or grievance (e.g. from a parent), we may need to share a pupil's information with other parties if it is relevant and appropriate to do so. For example, with the appropriate staff, pupil or parent involved and governors (LI, PI).
- 33 If you are based outside of the UK and have appointed an agent to act on your behalf during the admissions process (an overseas agent), then we may share information about a pupil with them. For example, we may send them the acceptance letter so that they can pass this on to you (LI).
- 34 We will share a pupil's academic and (where fair) their behaviour records with you so you can support their schooling (LI, PI).
- 35 If ever in the future, we are considering restructuring the charity which operates the School, we may share pupil's information with the other parties involved and with the relevant professional advisors (LI).
- 36 We will monitor a pupil's use of email, the internet and mobile electronic devices e.g. iPads. In certain circumstances we will look at the content of a pupil's communications (e.g. emails and text messages). This is to check that a pupil is not misbehaving when using this technology or putting themselves at risk of harm. If you would like more information about this you can read the ICT and Internet Acceptable Use Policy on our website or speak to the pupil's teacher (LI, PI).
- 37 We may use photographs or videos of our pupils 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 will continue to use these photographs and videos after a pupil has left the School (LI, PI).
- 38 Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson (LI, PI).

- 39 We publish our assessment 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 (LI).
- 40 We will keep details of a pupil's address when they leave so we can keep them updated about what is happening at the School, to tell them about events and activities and find out how they are getting on.
- 41 The School must make sure that its computer systems are working well and are secure. This may involve information about a pupil, for example, our anti-virus software might scan files containing information about pupils (LI).
- 42 From time to time, we use a third party to provide activities such as an external sports coach. We may share a pupil's information with them, for example, to tell them what sports they are good at (LI, PI).
- 43 Some of the records the School keeps and which contain a pupil's personal data may be used by the School (or by someone else such as the government) to check that the School has been a good school (LI, PI).
- 44 We also keep some information indefinitely for archiving purposes (this is known as "archiving in the public interest" under data protection law) and for historical research purposes. This includes the School's legitimate interest in research; supporting long-term accountability; enabling the discovery and availability of the School's and the wider school community's identity, memory, culture and history; enabling the establishment and maintenance of rights and obligations and of precedent decisions; educational purposes; and commercial and non-commercial re-use. For example, we keep some old photographs so that we have a record of what the School was like in the past. Information held in our archive may be made publicly available but this would only be done in compliance with data protection laws (LI, PI).
- 45 We will share a pupil's information with Governors of the School if it concerns something they should know about or which will enable them to fulfil their role as a School Governor. For example, this will apply if a pupil has done something really well or if there is a problem at the School they need to know about (LI, PI).

We will only share a pupil'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.

As you will see from the information above, in some cases we will rely on more than one lawful basis for using a pupil's information. In addition, we may move from one of the lawful bases listed above 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 data with the local authority in addition to the other lawful bases that are noted for safeguarding purposes.

We will only use a pupil's personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use personal information for an unrelated purpose, we will notify parents and explain the legal basis which allows us to do so.

Please note that we may process a pupil's personal information without parental knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

We use contractors to handle personal data on our behalf for the following purposes:

- a) IT consultants who might access information about you when checking the security of our IT network;
- a) We use software, apps and websites to help us with teaching, and to help us provide pastoral support to our pupils. For example, we use an app which allows pupils to access work which has been set by their teachers; and
- b) We use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the School site, such as iSAMs and MS Office 365.

If you have any questions about any of the above, please speak to your child's teacher.

The School has extra obligations in relation to some types of more sensitive personal data. This applies to information about racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information, information about sex life or orientation, information about criminal convictions or offences. When the School handles these types of information it will usually be doing so because:

- It is in the substantial public interest to do so, for example, to provide every pupil with an education, to look after all pupils or when the School is inspected.
- For medical purposes. This includes medical treatment and the management of healthcare services.
- The School is an employer (e.g. we employ our teachers). Also, the School will use a pupil's information to comply with social protection law (e.g. to look after pupils) and social security laws. Social protection law is concerned with preventing, managing, and overcoming situations that adversely affect people's wellbeing.
- To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.
- It is necessary for the establishment, exercise or defence of legal claims. For example, this allows us to share information with our legal advisors and insurers.

Consent

We may ask for parent's consent to use pupil information in certain ways as an alternative to relying on any of the bases above. For example, we may ask for parental 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 parental consent to use a pupil's personal data you can take back this consent at any time.

Any use of a pupil's information before you withdraw your consent remains valid. Please speak to the school office if you would like to withdraw any consent given.

Sending information to other countries

When the School sends personal data outside of the UK, we have to consider if the other country has the same level of protection for personal data as there is in the UK. Some countries are considered by the UK Government to have adequate rules and this includes all of the European Economic Area and some other countries, such as, New Zealand, Argentina and Japan.

In certain circumstances, we may send a pupil's information to countries which do not have the same level of protection for personal data as there is in the UK. For example, we may:

- store your information on cloud computer storage based in the USA.

In these cases, we will provide parents with details about the safeguards which we have in place outside of this privacy notice.

If you have any questions about the safeguards that are in place, please contact the Data Protection Lead.

For how long do we keep a pupil's information?

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

In some cases we may keep a pupil's information for a longer time 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.

Please see our Information and Records Retention Policy for more detailed information. This can be found on our website.

What decisions can parents make about their child's information?

Data protection legislation allows you to exercise a number of rights regarding your child's personal data. The rights are as follows:

- **Correction:** if personal data held by the School about your child is incorrect, you can ask us to correct it.
- **Access:** you can also ask what personal data we hold about your child and be provided with a copy. This is commonly known as making a subject access request. We will also give extra information, such as why we use this personal data about your child, where it came from and what types of people we have sent it to.
- **Deletion:** you can ask us to delete the personal data that we hold about your child in certain circumstances. For example, where we no longer need the information.
- **Our Portability:** you can request the transfer of your child's personal data to them or to a third party in a format that can be read by computer in certain circumstances. This applies where (a) the information has been provided by you; (b) the basis that we are relying on to process your child's personal data is consent or contract (please see "Our lawful bases for using your information" above); and (c) the personal data is being processed by us on computer.
- **Restriction:** you can request that we restrict how we use your child's personal data.
- **Object:** you may object to us using your child's personal data where:
 - we are using it for direct marketing purposes (e.g. to send you an email about a fundraising opportunity);
 - the lawful basis on which we are relying is either legitimate interests or performance of a task carried out in the public interest. Please see the section "Our lawful bases for using a pupil's personal data" above;
 - If we ever use a pupil's personal data for scientific or historical research purposes or statistical purposes.

The Data Protection Lead can give you more information about a pupil's data protection rights.

Information Rights Requests

We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:

- Your right to have all personal data deleted or destroyed doesn't apply when the lawful basis for processing is legal obligation or public task
- Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests
- Right to object to use of your private data doesn't apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent

See information on types of lawful basis above.

To exercise any of these rights, please contact our Data Protection Lead through the school office.

Further information and guidance

This notice is to explain how we look after a pupil's personal data. The Data Protection Lead can answer any questions which you might have.

Like other organisations we need to keep a pupil's personal data safe, 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 personal data we get fairly.

Please speak to the Data Protection Lead if:

- you would like to exercise any of your child's rights listed above; or
- you would like us to update the information we hold about your child; or
- you would prefer that certain information is kept confidential.

If you or your child fails to provide certain information when requested, we may not be able to perform our obligations under the contract 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 child and their classmates). Failing to provide information may also adversely affect the education and care we are able to provide to your child.

You have a right to lodge a complaint with a data protection supervisory authority. The supervisory authority in the UK is the Information Commissioner's Office (ico.org.uk). If you do have any concerns about how we have handled your child's personal data we would kindly ask that you contact us in the first instance before you speak to the ICO so that we have an opportunity to put things right.

Contact us

If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact our **Data Protection Lead in the first instance:**

Our **Data Protection Officer** is:

- Nicola Cook - SchoolsDPO - support@schoolsdpo.com

However, our **Data Protection Lead** has day-to-day responsibility for data protection issues in our school.

If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact them in the first instance:

- Ellie Grunewald – elliegrunewald@childrenshouseschool.co.uk