

Privacy Notice for Parents

1. What Is The Purpose Of This Document?

This privacy notice describes why and how we collect and use personal information about you and what we do with that information.

This information is provided in accordance with the rights of individuals because Data Protection Law gives individuals rights to understand how their data is used. Parents are encouraged to read this Privacy Notice and understand the School's obligations.

2. Why The School Needs To Process Personal Data

In order to carry out its ordinary duties the school needs to process a range of personal data about parents (including current, past and prospective parents) as part of its daily operation.

The School will need to carry out some of this activity in order to fulfil its legal rights, duties or obligations – including those under a contract (Twickenham Preparatory School Terms and Conditions) with parents of its pupils.

3. The Kind Of Information We Hold About You

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

Examples of personal data include contact details, financial information and next of kin. We may also hold information such as CCTV recordings, photos, video recordings and information on your religion or ethnic group.

Financial information that we hold about you may include:

- Details in relation to your payment of fees;
- Financial information from your child's previous school;
- Bankruptcy petitions; or
- Statutory demands.

4. How Is Your Personal Information Collected?

We collect personal information about you directly as part of the admissions process for your child. Sometimes additional information may be required from third parties including:

- Your child's previous school;
- Your child's doctor;
- The local authority; or
- Court orders.

Personal information may also be held due to:

- School CCTV footage; or
- Photographs or videos of you at School events.

5. How We Will Use The Information About You?

The School's primary reason for using your personal information is to provide educational services to your child.

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Keeping you up to date with what is happening at the School e.g. School bulletins and newsletters;
- To display/post photographs/videos of you on the School's website or social media platform; or
- To use for historical research or statistical purposes.

6. Legal Basis For Processing Your Personal Information

In relation to any processing activity we will, before the processing starts for the first time, and then regularly while it continues, review the purposes of the particular processing activity, and select the most appropriate lawful basis (or bases) for that processing, i.e.:

- that you have consented to the processing;
- that the processing is necessary for the performance of a contract to which you are party to;
- that the processing is necessary for compliance with a legal obligation to which the School is subject;
- that the processing is necessary for the protection of your vital interests;
- that the processing is necessary for the performance of a task carried out in the public interest or exercise of official authority; or
- that the processing is necessary for the purposes of legitimate interests of the School or a third party, except where the processing is unfair to you. The School relies on legitimate interests for most of the ways in which it uses your information. Specifically, the School has a legitimate interest in:
 - Providing educational services to your child;
 - Safeguarding and promoting the welfare of your child;
 - Promoting the objects and interests of the School. This includes fundraising. 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, including communicating with parents as appropriate;
 - Ensuring that all relevant legal obligations of the School are complied with; and
 - The legitimate interests of others e.g. another school will have a legitimate interest in knowing if you have not paid School fees due to the School.

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. These special categories are as follows: personal

information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, health information, and information about sex life or orientation. We may process special categories of personal information in the following circumstances:

- You have provided explicit consent;
- The processing is necessary to protect your vital interests, and you are physically incapable of giving consent;
- Personal data which is manifestly made public by you;
- The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers; or
- The processing is necessary for reasons of substantial public interest.

We will only use your personal information for the purposes for which we 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 your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

You can withdraw your consent to use your personal information at any time. Please speak to the Business Manager, Mrs Caroline Churchman, if you would like to withdraw any consent given.

7. Data Sharing

We may have to share your data with third parties, including third-party service providers.

We will share your personal information with third parties where required by law, where it is necessary to administer the contractual relationship with you or where we have another legitimate interest in doing so.

We require third parties to respect the security of your data and to treat it in accordance with the law.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

"Third parties" includes third-party service providers (including contractors and designated agents). For example the following activities are carried out by third-party service providers:

- Clarion calls for communications (including emergency situations);
- Parents Evening for parents' evening bookings;
- After school clubs;
- After school care;
- Database backups;
- Management information systems;
- BACS direct debit processing;

- Insurance company for serious incidents; and
- Police, legal advisers and emergency services as appropriate.

8. Sending Information To Other Countries

If the country we are sending your information to is outside the European Economic Area (EEA), (which comprises the countries in the European Union and Iceland, Liechtenstein and Norway), then it may not have the same level of protection for personal information as there is in the UK. In this event, the School would ensure that an adequate level of protection in respect of your personal information would apply.

An example of when it would be necessary to send your information to other countries would be; contacting an international school that your child attended prior to joining the School.

If you have any questions about the safeguards that are in place, please contact The Business Manager, Mrs Caroline Churchman.

9. Data Retention: How Long Will You Use My Information For?

We will only retain your personal information for as long as we need to educate and look after your child. We will keep some information after your child has left the School, for example, pupil files and administrative records are required to be kept for 25 years from date of birth.

We may retain personal data for archiving purposes where it is necessary to do so in the public interest, for scientific or historical research purposes, statistical purposes or in exceptional circumstances subject to appropriate safeguards being put in place to protect your rights and freedoms.

Details of retention periods for different aspects of your personal information are available in our Data Retention & Storage Policy which is available on request from the School Office.

10. Rights Of Access, Corrections, Erasure and Restriction

10.1 Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on

this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact The Business Manager, Mrs Churchman in writing.

11. Point Of Contact

The Business Manager, Mrs Caroline Churchman, is responsible for overseeing compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact:

Mrs Caroline Churchman

Business Manager

Email: accounts@twickenhamprep.co.uk

Direct Line: 020 8783 3551

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, if you feel that the School has not acted properly when using your personal information.