



## **Pupil Privacy Notice** (Pupils in Reception to Year 7)

### **1. What Is The Purpose Of This Document?**

This privacy notice describes why and how we collect and use personal information about your child 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. We are giving you this notice because you are able to exercise your child's data protection rights on their behalf, until he/she is of sufficient maturity to make their own privacy decisions.

### **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 your child 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.

### **3. The Kind Of Information We Hold About Your Child**

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

Examples of personal data include contact details, date of birth, medical details, behaviour records and exam results. We may also hold information such as CCTV, photos, video recordings and information on your child's religion or ethnic group.

### **4. How Is Your Child's Personal Information Collected?**

We collect personal information about your child directly as part of the admissions process and from your child's teachers and other pupils. 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 your child at School events.

### **5. How We Will Use The Information About Your Child?**

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

your child with an education. We collect this information so that the School can run properly, safely and so that others can see how the School operates. Most commonly, we will use your child's personal information in the following circumstances:

To ensure that staff are aware of:

- Allergies;
- Medical conditions; and
- Safeguarding issues.

External Authorities may need to be informed of:

- Welfare concerns;
- Attendance;
- Serious behavioural issues that require police involvement; and
- Accidents

Parents are informed of:

- Academic results;
- Pastoral care; and
- Behavioural concerns.

Safeguarding related – The School:

- Needs to be aware of information regarding court orders or criminal petitions concerning your child.

Other Educational Institutions may request:

- Exam results;
- References; and
- Safeguarding records.

Publications - The School:

- Posts photographs, videos and information on School events and news on its website, weekly newsletter and social media sites to keep parents and others informed and updated on what the School has been doing. This information may still be shown after your child has left the School.

External Third Parties – The School:

- May need on occasion to share your child's information with external third parties e.g. professional advisors, insurance providers, I.T. Consultants, legal advisors and other experts to assist the School in fulfilling its obligations and to ensure the proper running of the School.

Administration and Education – The School:

- Checks that your child is legally entitled to study in the UK;
- May use photographs and videos for educational purposes; and
- May keep details of your child's address when they leave.

Security – The School:

- Operates CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms; and

- Monitors your child's use of email, the internet and mobile electronic devices e.g. iPads.

We will only use your child's personal information when the law allows us to. We will only share your child'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.

## **6. Legal Basis For Processing Your Child's 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 child's 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 your child. The School relies on legitimate interests for most of the ways in which it uses your child's 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;
  - Facilitating the efficient operation of the School;
  - 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 requesting references regarding your child.

"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 include: 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 child's vital interests, and they are physically incapable of giving consent;
- Personal data which is manifestly made public by your child;
- 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 child's 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 child's 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 child's 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 child's 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 child's personal information in line with our policies. We do not allow our third-party service providers to use your child's personal data for their own purposes. We only permit them to process your child's personal data for specified purposes and in accordance with our instructions.

"Third parties" includes third-party service providers (including contractors and designated agents). The following types of activities are carried out by third-party service providers e.g. after schools clubs, learning support providers, on-line educational platforms and residential course providers.

## **8. Sending Information To Other Countries**

If the country we are sending your child's personal 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 child's 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 Child's Information For?**

We will only retain your child's personal information for as long as we need to educate and look after them. 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 child's rights and freedoms.

Details of retention periods for different aspects of your child's 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 your child's personal information**

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

- **Request access** to your child's personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about your child and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about your child. This enables you to have any incomplete or inaccurate information we hold corrected.
- **Request erasure** of your child's 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 child's personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your child's personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your child's 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 child's personal information for direct marketing purposes.
- **Request the restriction of processing** of your child's personal information. This enables you to ask us to suspend the processing of personal information about your child, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your child's personal information to another party.

If you want to review, verify, correct or request erasure of your child's personal information, object to the processing of personal data, or request that we transfer a copy of your child's 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 personal information, please contact:

**Mrs Caroline Churchman**  
**Business Manager**  
**Email: [accounts@twickenhamprep.co.uk](mailto: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 child's personal information.