



# High March

## PRIVACY NOTICE FOR PARENTS

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This policy applies to the Early Year Foundation Stage, Key Stage 1 and Key Stage 2

### Useful Websites

[www.highmarch.co.uk](http://www.highmarch.co.uk)

[www.education.gov.uk](http://www.education.gov.uk)

# HIGH MARCH

## PRIVACY NOTICE FOR PARENTS

### Lawfulness, fairness and transparency

Parents should be aware that data processed by High March is lawful, fair, transparent and proportionate for the purpose for which it was obtained.

### Information about use of personal data

Under data protection law, including UK GDPR and the Data Protection Act 2018 individuals have a right to be informed about how High March School Limited ('the School') uses any personal data held by the School about them. The School complies with this right by providing 'privacy notices' to individuals when processing their personal data.

This Privacy Notice explains how we collect, store and use personal data about current, past and prospective parents, legal guardians and those with parental responsibility regardless of whether it is in paper or electronic format. This Privacy Notice also applies in addition to the School's other relevant terms and conditions and policies.

This Privacy Notice applies to the whole School, including the EYFS.

### Data Controller

The School is the 'Data Controller' for the purposes of data protection law.

### The Personal Data held by the School

Personal data that the School may collect, use, store and share (when appropriate) about parents includes, but is not restricted to:

- Personal details such as home address, contact details, gender, date of birth, marital status, dependants.
- Emergency contact details
- Bank account details
- Copy of driving licence, passport or other personal ID if a parent has volunteered for a volunteer role in School
- Images of parents alongside pupils and staff engaging in School activities
- CCTV images for security purposes
- Data supplied by parents to the School whether on the School's e-mail and other internal ICT communications or on paper

The School may also collect, store and use information about parents that falls into '**special categories**' of more sensitive personal data. This includes information about health, details of any illnesses, allergies or other medical conditions, accidents, occupational health records, health monitoring and sickness leave records, ethnicity, trade union membership and religious or other similar beliefs, only in so far as relevant and necessary for the School's legitimate purposes in schooling the parents' child and safeguarding the pupil's interests.

The School may also hold data about parents that has been received from other organisations, including other schools, local authorities and the Department for Education.

### Why the School uses this Data

The School uses this data to:

- Fulfil our safeguarding obligations towards pupils
- Administer Admissions
- Enable financial transactions including payment of fees and consideration of Bursary applications
- Provide appropriate pastoral care to pupils
- Communicate with parents
- Ensure compliance with and strictly in accordance with the School's ICT Security and Safeguarding & Child Protection and any other related policies
- Promote the School to prospective pupils and parents (including through the School's prospectus, website and social media applications)
- Other reasonable purposes relating to the efficient operation and smooth running of the School business including to obtain appropriate professional advice and insurance for the School

### The School's Legal Basis for using this Data

The School processes personal data in order to fulfil **contractual obligations** as a School and to promote the objects and interests of the School, facilitate the efficient operation of the School and ensure that all relevant **legal obligations** of the School are complied with.

Other uses of personal data will be made in accordance with the School's legitimate interests, or the legitimate interests of third parties, provided that these are not outweighed by the impact on individuals and provided such use does not involve special or sensitive types of data.

In addition, the School will on occasion need to process **special category personal data** (for example, concerning health) or from time to time by explicit consent where required. These reasons will include:

- To safeguard pupils', parents' and staff welfare and provide appropriate pastoral and where necessary, medical care, and to take appropriate action in the event of an emergency, incident or accident
- As part of any School or external complaints, disciplinary or investigation process
- For legal and regulatory purposes including safeguarding and child protection and health and safety

### Collection of Data

The School will only collect personal data for specified, explicit and legitimate reasons. If the School wishes to use personal data for reasons other than those provided when we first obtained it, we will inform the individuals concerned and obtain consent before we do so.

## How the School stores this Data

The School retains personal data about parents during their child's schooling at High March electronically on the School's information management systems, the School's network, GDPR compliant cloud-based storage or manually in pupil files. The School may also keep it beyond this period at the School if this is necessary in order to comply with our legal obligations and legitimate interests. The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including the use of technology and devices, and access to School systems. All staff will be made aware of this Privacy Notice and of their duties under GDPR and data protection law as amended from time to time and have or will receive suitable training.

## Data Sharing

In the main, personal data collected by the School will remain within the School and in GDPR-compliant, security-controlled, cloud-based storage and will be processed by appropriate members of staff only in accordance with GDPR and data protection legislation as amended from time to time. The School will not normally share personal data of the parents with anyone else, but may do so where there is an issue that puts the safety of a pupil or our staff at risk or when we need to liaise with other agencies.

The School may share data:

- To enable the relevant authorities to monitor the School's performance, for example Independent Schools Inspectorate
- To compile statistical information (normally used on an anonymous basis) for annual and other data survey
- To safeguard pupils' and staff welfare and provide appropriate pastoral, medical or occupational health care
- Where necessary in connection with learning and extra-curricular activities undertaken by pupils for example, educational visits, residential trip providers, such as Manor Adventure, the Ski Trip, the French Trip
- To obtain appropriate professional advice and insurance for the School
- To undertake financial transactions
- For research and statistical purposes, as long as personal data is sufficiently anonymised or consent has been provided

Our suppliers or contractors need data to enable us to provide services to our staff and pupils, for example ICT support, and catering.

The School will also share personal data with law enforcement and government bodies where we are legally required to do so, including for the prevention or detection of crime and/or fraud, the apprehension or prosecution of offenders, in connection with legal proceedings, or where the disclosure is required to satisfy our safeguarding obligations.

The School may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our pupils or staff.

The School will only transfer personal data to a country or territory outside the European Economic Area if satisfied that the transferee will only process the data in accordance with data protection law.

### **Parental Rights regarding Personal Data**

Individuals have a right to make a 'Subject Access Request' to gain access to personal information that the School holds about them. This includes:

- Confirmation that their personal data is being processed
- Access to a copy of the data held
- The purposes of the data processing
- The categories of personal data concerned
- The identity of those with whom the data has been, or will be, shared
- The duration of retention of data
- The source of the data, if not the data subject.

If you would like to make a request, please contact the School's Data Protection Officer (DPO), who is the Bursar, in writing.

### **Other Rights**

Under data protection law, individuals have certain rights regarding the ways in which their personal data is used and kept safe, including the right:

- to request rectification of any data that is inaccurate or incomplete
- to have their personal data erased
- to prevent further processing if:
  - it is no longer required for the purposes for which it was collected
  - consent is withdrawn
  - there is objection to the processing and no superseding legitimate interest
  - the personal data is being unlawfully processed
  - the personal data must be removed in order to comply with a legal obligation
- to request a restriction of further processing of personal data
- to object to processing on specific grounds

If parents wish to exercise any of these rights, they should please contact the DPO, who is the Bursar, in writing.

### **Rectification of Data**

Parents may ask the School to correct personal data relating to them which they consider to be inaccurate. If a member of staff receives such a request and does not agree that the personal data held is inaccurate, they should nevertheless record the fact that it is disputed and inform the DPO. Parents should inform the DPO of any

change in personal circumstances, in order that the School's records can be amended.

### **Providing Information over the Telephone**

Any member of staff dealing with telephone enquiries, in order to protect the confidentiality of parents and pupils, should be careful about disclosing any personal information held by the School. In particular they should:

- Check the caller's identity to ensure that information is only given to a person entitled to it
- Suggest that the caller put their request in writing if they are not sure about the caller's identity and if the identity cannot be verified over the telephone

### **Complaints**

The School takes very seriously any complaints about our collection and use of personal information. If a parent considers that our collection or use of personal information is unfair, misleading or inappropriate, or has any other concern about our data processing, please raise this with us in the first instance with the DPO. Alternatively, you can make a complaint to the Information Commissioner's Office at: <https://ico.org.uk/concerns>, 0303 123 1113 or Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

#### **Related documents:**

ICT Security Policy

Mobile Phone and Images Policy

Parent Handbooks

Privacy Notice for Pupils

Privacy Notice for Staff