

DATA PROTECTION NOTICE

PARENT PRIVACY NOTICE



Blundell's

FOUNDED 1604

Privacy Notice for Parents

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Privacy Notice for Parents of Blundell's Preparatory School and Blundell's School ("the School")

1. About this Policy

- 1.1 Your privacy is very important to us and we have taken steps to protect it. The School aims to be clear about the reasons for processing your personal data and to only handle it in ways you reasonably expect. This policy explains how the School use (or "process") personal data about pupils and their parents. In it, any reference to "pupils" includes current, past or prospective pupils and any reference to "parents" includes parents, carers or guardians.
- 1.2 This policy should be read in conjunction with the School's terms and conditions and any other information we provide about how we process personal data.

2. General Statement of the School's Data Protection Obligations

- 2.1 The "data controller" of the personal data we hold about you is the School and it is processed by us strictly in accordance with data protection law applicable in the UK. We are registered with the Information Commissioner's Office and our entry on the data protection register can be viewed at www.ico.org.uk under registration number Z535913X.
- 2.2 The School has appointed the Bursar as Data Protection Lead who will endeavour to ensure that all personal data you provide to the School is processed in a way that complies with both this policy and data protection law. The Data Protection Lead's contact details are in Paragraph 17 below.

3. What Sort of Personal Data Does the School Process?

- 3.1 In order to carry out our functions, the School collects and uses a wide variety of personal data from various sources, including by obtaining information from pupils and parents. Personal Data means data that identifies or is capable of identifying a living individual and can include facts, opinions or intentions towards the individual. This is likely to include (but is not necessarily limited to) the following:
 - name, address, date of birth, postal address, email address and telephone contact numbers;
 - next of Kin details including their contact details;

- financial information such as bank details;
- references written or received by the School (such as educational references);
- information about pupils' admissions and attendance, education, achievements, examinations and assessments, disciplinary records and, where relevant, information about special needs such as reports and evaluations;
- photographs and, in some cases, video and audio data relating to pupils and occasionally others;
- images captured by our CCTV system;
- biometric information which will be processed by the School in accordance with both data protection law and the Protection of Freedoms Act 2012.

3.2 In some cases, the School will need to process "Special Category Data" such as information about your health and welfare, and the health and welfare history of your family:

- where appropriate, criminal records information if you volunteer for School outings or activities where a DBS check is required;
- your personal data as it relates to any concerns or complaints you have raised with the School.

4. What Do We Use Your Personal Data for?

4.1 The School processes personal data (including Special Category Data) for a wide variety of operational, statutory and other purposes. By way of example only, the School may process personal data for the following purposes:

- to enable the School to meet its primary function under the Parent Contract of providing education services, careers services, extra-curricular activities, assessment and examination purposes and SEN services;
- to support teaching and learning, to monitor and report on pupils' progress and to assess how well the School is doing as a whole; to supply and receive pupil information and references;
- to supply and receive information relating to payment history including details of any fee arrears;
- to confirm the identity of prospective pupils and their parents and for

the purposes of processing applications generally;

- to assist the smooth transition of a pupil from Blundell's Preparatory School to Blundell's School, and to do so will necessarily involve sharing of personal data between the schools;
- to enable us to share academic and sporting expertise and facilities more easily between Blundell's Preparatory School and Blundell's School, and to do so with little or no disruption will necessarily involve sharing of personal data between the schools;
- to enable the School to plan for the future; for research and statistical analysis; for insurance purposes; to communicate with pupils and parents including alumni and others; to promote the School;
- to provide care including pastoral support and where necessary medical care as required under the Parent Contract;
- to comply with our legal and regulatory duties and obligations;
- where otherwise reasonably necessary for the School's purposes.

5. Who do we share Your Personal Data with?

5.1 We will not share your personal data (including Special Category Data) with anyone outside the School without your consent unless the law requires or allows us to do so or as deemed necessary by the School for the exercise of our functions or performance of the Parent Contract. Any sharing of personal data is carried out strictly in accordance with data protection law.

5.2 By way of example, the School may share your personal data with third parties in the following circumstances:

- to provide a confidential pupil reference to another educational establishment or employer;
- to provide information relating to payment history and, where relevant, outstanding fees, to another educational establishment that the pupil proposes to attend;
- to disclose details of the pupil's medical health or condition to others where it is in the best interests of the pupil or another person to do so such as a medical professional or insurance provider or for the organisation of a School trip;
- to publish pupil examination results or details of other pupil achievements;
- to monitor use of the School's communication and IT systems so as to ensure that they are being used in accordance with the School's rules;

- for School operational purposes such as to obtain insurance or professional advice, to obtain IT and support services from external providers and to organise School trips and extra-curricular activities;
- where the School is legally required or obligated to share information e.g. for child protection or health and safety purposes;
- to use photographs in School and other publications, including the School website and social media. The use of images in this way will be strictly in accordance with the School's policy on pupil images. (see paragraph 6 below);
- for fundraising, marketing or School promotional purposes and to maintain relationships with pupils. The use of personal data for these purposes will be strictly in accordance with the School's policy (see paragraph 8 below).

6. Photographic and Video Images

6.1 The School may use photographs (in either digital or printed format) or video of pupils and parents in the following ways:

6.1.1 Processing Images and Names for School Purposes

- For our legitimate interests in holding a formal identity photograph of each pupil for administrative purposes
- For our legitimate interests in keeping the school community informed of school and pupil achievements, e.g. internal school magazine
- For our legitimate interests in identifying those pupils with specific needs to staff, e.g. pupils with allergies etc.

6.1.2 Processing Images for Further Purposes

Where appropriate consent * has been provided, the School may also

- Include photographs or video of pupils and parents in various external facing School publications (in printed and electronic format) e.g. the School Prospectus, on the School's website and on various School social networking platforms e.g. Twitter, Facebook, Instagram etc. for the following purposes:
 - School promotional, marketing and fundraising purposes;
 - Communicating with the school community and to celebrate pupil achievements;
 - Keeping in touch with former pupils and their parents.
- Allow third party media (for example, visiting journalists) to use photographs or video for their own journalistic purposes.

Where an image or video is published for any of these further purposes, the image will only be published together with the pupil's first name providing you have consented. The image of the pupil will only be published together with the child's full name where the specific consent has been provided by the appropriate person and such consent will be sought on a case by case basis.

6.1.3 Giving Consent and Changing Your Preferences:

*We will invite your consent for the School to use images or video of pupils and parents for "further purposes" (above) when a pupil is admitted and also upon leaving. You will be able to provide your consent via the iSAMS Parent Portal. If you consent for these "further purposes" you have the right to withdraw or amend your consent for these various further uses of images and video at any time by contacting the School's DPL using the contact details in Paragraph 17 below or via the iSAMS Parent Portal.

Any changes made to your preferences will take effect from the date we issue our written acknowledgement. Where consent is withdrawn, the School will cease using the image in future publications. However, it may not always be possible to remove images/video that have already been printed or published.

7. Use of Photographs and Video by Pupils, Parents and Others

7.1 Where parents and others attend School performances and sporting events etc. the School will generally permit reasonable photography and recording for personal domestic purposes only. However, the School does not permit the publishing of any photograph or recording of children other than your own. This includes publishing on video or photograph sharing websites (such as YouTube and Instagram etc.) and social networking platforms (such as Facebook and Twitter etc.).

7.2 The School's policy reflects our legal obligation to protect the privacy, and in some cases, personal safety of all of our pupils and recognises that not all pupils and parents wish or consent to their images and other personal data being published. This is our general policy and may be subject to variation on a case-by-case basis.

8. School Fundraising and Marketing, Keeping in Touch and Alumni Relations

8.1 Essential School Communications

The School will use your contact details to keep you informed about School activities and other School notices by post and email, in order to fulfil our obligations to you under the Parent Contract or where it is necessary in our legitimate interests. You can update the way we communicate with you for these purposes at any time by contacting the School's DPL whose details can be found in Paragraph 17 below.

8.2 Further Communications

In addition, with your consent, the School may also use your details for the purposes set out below.

We may contact you via your preferred channel(s) of communication (email, SMS, phone, social networking platform or post) for these purposes. You have the right to tell us to stop using your information for these purposes at any time or to alter the channel of communication by contacting the School's DPL whose details can be found in Paragraph 17 below.

- The School will share personal data of parents, alumni and other supporters with certain third party organisations which have been specifically set up to help with fundraising and to establish and maintain relationships with the School community such as The Old Blundellian Club and The Peter Blundell's Society. Where this happens, the School will only share the minimum information necessary and in a way that complies with data protection law.
- The School will contact you (including via the third party organisations mentioned above) to update you with details of our latest School fundraising activities, to promote and market the School generally and occasionally where appropriate, to raise funds for other causes which we think are worthy.
- In order to help with our School fundraising, on occasion the School may combine information you have provided to us with other information from external sources such as Companies House, the press, social media sites and third party organisations. Doing this helps us improve the quality and accuracy of the information we hold. We also use this information to gain a better understanding of our supporters such as their interests, occupation, activities and level of potential financial support.
- Where we engage an external organisation to help with this fundraising activity, we will also need to share some information about you with them e.g. name and contact details. Where this happens, we only share the minimum personal data necessary for the purpose and always in a way that complies fully with data protection law.

9. The Lawful Basis for Using Your Personal Data

9.1 Most of the personal data we collect about you is needed to make sure the School is able to fulfil its obligations to you under the Parent Contract. For example, we require your personal contact details to fulfil our contractual obligations to keep you informed of your child's health, wellbeing and educational development. We also use your personal data to make sure that the School is acting within the law and meets its legal obligations.

9.2 There are also some situations where we use your personal data for other reasons (these are known as the "legitimate interests" of the School). This will usually be the case when the Parent Contract we have with you does not apply (or is not yet in place) or when there is no specific law which requires us to use

your personal data. For example, we will use your personal data when deciding whether your child can be admitted to the School and when we ask for professional advice from someone outside the School.

10. How do We Protect and Handle Your Personal Data?

10.1 Data protection law requires the School to take appropriate technical and organisational security measures to protect personal data. All staff are made aware of their duties under data protection law and this policy.

10.2 Apart from keeping your personal data secure we also take steps to ensure that it is kept accurate and, where necessary, kept up to date, is adequate, relevant and not excessive in relation to the purpose/s for which the data is being processed. You have the following rights in connection with your personal data:

- Ask to see your personal data (see Paragraph 11 below);
- Ask for a correction of your personal data to ensure it is accurate;
- Ask for your personal data to be deleted;
- Object to the processing of your personal data;
- Ask for us to limit the processing of your personal data;
- Request the transfer of your personal data to another party.

10.3 If you wish to do any of the above, please contact the School's DPL whose details can be found in Paragraph 17 below.

10.4 We endeavor to ensure that information is not kept for longer than necessary and is deleted as soon as reasonably practicable. However, the School may retain some personal data so that we can comply with regulatory or legal obligations and for legitimate organisational reasons. Please see the School's Data Retention Policy for further information.

11. Your Right of Access to Personal Data

11.1 Under data protection law, individuals have the legal right to access their personal data held by the School and certain other information relating to how their data is processed. This is known as the right of subject access.

11.2 The right of subject access applies subject to the application of legal restrictions. For example, you may not be able to access information, which is capable of identifying other people or information which is subject to legal privilege (such as legal advice given to the School), confidential references given by the School and copies of examination scripts.

11.3 Pupils are free to make their own Subject Access Request if they choose provided that we think they are sufficiently mature enough to understand the consequences of their request. Generally, pupils that are age 13 or over are considered to have achieved this level of maturity although this will depend upon the individual child, the context and the nature of the personal data,

which they could potentially have access to. We will consider each pupil Subject Access Request on an individual basis.

- 11.4 A pupil may ask a parent or other representative to make a Subject Access Request on their behalf. However, generally, we would expect a person with parental responsibility to make a Subject Access Request on behalf of younger pupils. Where a parent or other adult makes a Subject Access Request on behalf of a pupil the School is required to consider if the request is in fact being made on behalf of the pupil and if disclosure is in the pupil's best interests. In some cases, where appropriate, we may need to discuss the request with the pupil themselves.
- 11.5 Subject Access Requests should be made in writing to the School's DPL using the contact details below. In some cases, the School may ask for further information to confirm the identity of the requestor or for information to help locate the information requested. Requests will be processed as quickly as is reasonably practicable and within the legal time limit of one calendar month. The School may charge a reasonable fee, taking into account the administrative costs of providing the information, where the Subject Access Request is manifestly unfounded or excessive. The School may also refuse to respond to the request in these exceptional circumstances.

12. Further Rights under Data Protection Law

- 12.1 Data protection law gives legal rights to the individual that is the subject of the personal data. In most cases, this will be the pupil. However, where the School needs consent in order to process a pupil's personal data then usually the School will rely upon parental consent.
- 12.2 In some cases, however it may not be reasonable or appropriate to rely upon parental consent in order for the School to process pupil personal data. E.g. given the nature of the processing and where the pupil has sufficient maturity and understanding or where other laws expressly permit the pupil to provide (or withhold) consent. In such cases, parents should be aware that they may not be consulted.
- 12.3 Where a pupil is concerned about their privacy or expressly objects to their personal data being disclosed to a parent, the School will usually respect the pupil's wishes unless in the School's opinion it is appropriate and in the best interests of the pupil (or others) to do otherwise.

13. Transferring Your Information Overseas

Occasionally we may need to transfer personal data overseas including outside the European Economic Area for the purposes set out above. Where this happens, we will ensure that appropriate safeguards are put in place to protect your personal data.

14. Your Obligations

14.1 In order for the School to keep its records accurate and adequate we need to ensure that they are kept up to date. You are required to inform us of any changes to the personal data that we hold so that we can amend our records accordingly. For example, you are required to notify us immediately of any change of address or other contact details or any specific medical or health information.

14.2 Please notify changes to your personal data to the relevant member of staff as follows:

Contact Details – School Office on 01884 252543/info@blundells.org or via iSAMS Parent Portal

Medical/Health Information – Medical Centre on medical@blundells.org

Financial Details – Bursar on 01884 252232/bursar@blundells.org

15. Questions and Complaints

15.1 If you have any queries or complaints concerning your personal data or any questions about this policy please contact the School's DPL using the contact details below.

15.2 If you are unhappy with how we are processing your personal data or your child's personal data, you can make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, although the ICO recommends that you take steps to resolve the matter with the School before involving them.

16. Changes to this Privacy Notice

We may update this privacy notice at any time, and we will make any revised privacy notice accessible to you on the School's website. We may also notify you in other ways from time to time about the processing of your personal data.

17. Contact the School Data Protection Lead

The School's Data Protection Lead can be contacted using the methods below. In some cases, it may be appropriate or necessary to put your request in writing rather than by telephone.

By Post: Blundell's School, Blundell's Road, Tiverton, Devon, EX16 4DT

By phone: 01884 252232

By email: bursar@blundells.org

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