

Pupil Privacy Notice for Parents

This notice refers to both Wellington Senior School and Wellington Prep School

Headmaster	Henry Price
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Date Reviewed	May 2018
Date of Next Review	May 2019
Amendments	
Website	Yes
Legal Sign-off	No

Introduction

For the purposes of Data Protection legislation, the School is the Data Controller. This means it is in charge of personal data about your child. The Data Officers for the School are Tim Williams, Bursar (designated lead) and David Pacey, Director of IT, (designated deputy).

The postal address of the School is:

Wellington School
South Street
Wellington
Somerset
TA21 8NT

If you have any questions about this notice, please email at ws-gdpr@wellington-school.org.uk.

In this policy 'we' and 'us' means the School.

This notice is to help parents understand how and why we collect your child's personal information and what we do with that information. It also explains the decisions that you can make regarding your child's information.

We are informing you of this notice because you can exercise your child's data protection rights on their behalf. When your child is older (usually when they reach the age of 12) they will be considered mature enough to exercise their own data protection rights.

If you have any questions about this notice, please talk to the Data Protection Lead.

What is "personal information"?

Personal information is information that the School holds about your child and which identifies your child.

This includes information such as their date of birth and address as well as information such as exam results, medical details and behaviour records. The School may also record your child's religion or ethnic group. CCTV, photos and video recordings of your child are also personal information.

How and why does the School collect and use personal information?

We set out below examples of the different ways in which we use personal information and where this personal information comes from. Our primary reason for using your child's information is to provide your child with an education. Pupil Privacy Notice for Parents – May 2018

The admissions forms which you complete give us personal information about your child. We get information from your child, his / her teachers and other pupils. Your child's old school also gives us information about your child if we need this to teach and care for them.

Sometimes we get information from your child's doctor and other professionals where we need this to look after your child.

We collect this information to help the School run properly, safely and to let others know what we do here. Here are some examples:

- We need to tell all appropriate members of staff if your child is allergic to something or might need extra help with some tasks.
- We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms.
- We may need to report some of your child's information to the government. For example, we may need to tell the local authority that your child attends the School or let them know if we have any concerns about your child's welfare.
- We may need information about any court orders or criminal petitions which relate to your child. This is so that we can safeguard your child's welfare and wellbeing and the other pupils at the School.
- If your child is from another country, we must make sure that they have the right to study in the UK. We might have to provide their information to UK Visas and Immigration.
- Depending on where your child will go when they leave us we may need to provide their information to other schools and colleges. For example, we may share information about your child's exam results and provide references. We may need to pass on information which they need to look after your child.
- If your child takes public examinations, we will need to share information about them with examination boards. For example, if your child requires extra time in exams.
- We may need to share information with the police or our legal advisers if something goes wrong or to help with an inquiry. For example, if one of your child's classmates is injured at School or if there is a burglary.
- Occasionally we may use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We might need to share your child's information with them if this is relevant to their work.
- If your child has misbehaved in a serious way, and the police have become involved, we may need to use information about the action taken by the police.
- We may share some information with our insurance company to make sure that we have the insurance cover that we need.
- We may share your child's academic and (where fair) their behaviour records with you or their education guardian so you can support their schooling.

- We will need to share information about your child as they progress from Prep through to Senior School.
- 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.
- We will monitor your child's use of email, the internet and mobile electronic devices e.g. iPads. This is to check that your child 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 IT acceptable use policy or speak to the Data Protection Lead.
- We may use photographs or videos of your child 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 your child has left the School.
- Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.
- If you have any concerns about us using photographs or videos of your child, please speak to the Data Protection Lead.
- We publish our public exam 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 may keep details of your child's address when they leave so we can send them the Acorn magazine (Prep School) and Wellington School magazine (Senior School), and find out how they are getting on. We may also pass their details on to the alumni organisation which is called the Old Wellingtonians' Association. Further information on the alumni association can be found here www.wellington-school.co.uk.

If you have any concerns about the above, please speak to the Data Protection Lead.

Our legal grounds for using your child's information

This section contains information about the legal basis that we are relying on when handling your child's information.

Legitimate interests

This means that the processing is necessary for legitimate interests 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 your child with an education.
- Safeguarding and promoting your child's welfare and the welfare of other children.

- Promoting the objects and interests of the School. This includes fundraising e.g. if we want to raise money to fund bursaries or new buildings.
- Facilitating the efficient operation of the School.
- Ensuring that all relevant legal obligations of the School are complied with.

In addition, your child's personal information may be processed for the legitimate interests of others. For example, we may use information about your child when investigating a complaint made by another pupil.

If you object to us using your child's information where we are relying on our legitimate interests as explained above please speak to the Data Protection Lead.

Legal obligation

Where the School needs to use your child's information to comply with a legal obligation, for example to report a concern about their wellbeing to Children's Services.

We may also have to disclose their information to third parties such as the courts, the local authority or the police where legally obliged to do so.

Vital interests

For example, to prevent someone from being seriously harmed or killed.

Public interest

The School considers that it is acting in the public interest when providing education.

The School must also comply with an additional condition where it processes special categories of personal information. These special categories include: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information, and information about sex life or orientation.

Substantial public interest

The processing is necessary for reasons of substantial public interest.

Vital interests:

To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

Legal claims:

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.

Medical purposes

This includes medical treatment and the management of healthcare services.

We may ask for your and/or your child's consent to use your child's information in certain ways. If we ask for your and/or your child's consent to use your child's personal information you/ your child can take back this consent at any time. Any use of your child's information before consent is withdrawn remains valid. Please speak to the Data Protection Lead if you would like to withdraw any consent given.

Sending information to other countries

We may send your child's information to other countries where:

- we store information on computer servers based overseas; or
- we communicate with you when you are overseas (for example, during the summer holidays if you live in a different country).

If this happens we will be very careful to make sure that it is safe to transfer your child's information. The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here:

http://ec.europa.eu/justice/data-protection/internationaltransfers/adequacy/index_en.htm

If the country that we are sending your information to is not on the list or, is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland) then it might not have the same level of protection for personal information as there is in the UK.

If we cannot be sure that it is safe, we will tell you why. We will then talk to you and/or your child to make sure you are happy for us to transfer the information.

For how long do we keep your child's information?

We keep your child's information for as long as required to educate and look after them or for as long as the law requires us to. We will keep certain information after your child has left the School, for example, so that we can find out what happened if you make a complaint. Most of the information we have about your child will be in our pupil file. We usually keep these until your child reaches the age of 25, unless he or she moves to another school in which case we will send the pupil file to the new school. In exceptional circumstances we may keep your child's information for a longer time than usual, but we would only do so if we had a good reason and only if we can do so under data protection law.

We can keep information about your child for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the School.

What decisions can your child make about his/her information?

From May 2018 your child will be able to make various decisions about his or her information. Some of these are new rights whilst others build on your child's existing rights.

Your child's rights are as follows:

- if information is incorrect your child can ask us to correct it;

- your child can also ask what information we hold and be provided with a copy. We will also give your child extra information, such as why we use this information about your child, where it came from and what types of people we have sent it to;
- your child can ask us to delete the information that we hold about him/her in certain circumstances. For example, where we no longer need the information;
- your child can ask us to send him or her, or another organisation, certain types of information in a format that can be read by computer;
- our use of information about your child may be restricted in some cases. For example, if your child tells us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.

If your child does not have capacity to understand his or her own data rights, those with parental responsibility will be able to exercise these rights on his or her behalf.

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

Further information and guidance

This notice is to explain how we look after your child's personal information. The Bursar is the person responsible at our School for managing how we look after personal information and deciding how it is shared.

Please speak to the Data Protection Lead if:

- you object to us using your child's information for marketing purposes e.g. to send your child information about school events; 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 consider that we have not acted properly when using your child's personal information, you can contact the Information Commissioner's Office:

www.ico.org.uk