HUNTER HALL

PREPARATORY & PRE-SCHOOL

HUNTER HALL SCHOOL
PRIVACY NOTICE FOR PARENTS

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Parent Privacy Notice - Key Information

This notice contains the key information about **how** and **why** we collect your personal data and **what** we do with that information.

Personal data is information about you from which you can be identified (either directly or indirectly). For example, information about your family circumstances, your financial information and photos of you.

We use your personal data in order to:

- carry out our obligations and enforce our rights under our contract with you;
- teach your child and our other pupils;
- look after your child and others, such as, other pupils and staff;
- enable the School to comply with its legal obligations, to assist with the management and operation of the School, and to advance and protect the School's interests, objects and reputation; and
- fundraise, market and promote the School. For example, by writing to you about fundraising for a new school project.

We set out below examples of the different ways in which we use your personal data and where that personal data comes from:

- We obtain information about you from admissions forms (including our registration form) and from your child's previous school(s) and/or nurseries. We may also get information from professionals, such as doctors and from local authorities;
- We will have information about any family circumstances which might affect your child's welfare or happiness;
- We will process information about you in relation to the payment of fees and for risk management and compliance purposes. In some cases we get information about you from third parties such as credit reference agencies or from your child's previous school(s) and/or nurseries;
- We may obtain photos or images (including video recordings) of you at School events to use on social media and on the School website. This is to show prospective parents and pupils what we do here and to advertise the School. We may continue to use these photos and videos after your child has left the School;
- We will send you information to keep you up to date with what is happening at the School. For example, by sending you information about events and activities taking place (including fundraising events) and the School newsletter; and
- We will keep details of your address when your child leaves the School so we can keep you updated about what is happening at the School, to tell you about events and activities and find out how your child is progressing.
- We may also pass your details onto the alumni organisation.

In some situations we may need to share your personal data with third parties. For example:

- In accordance with our legal obligations, we may share information with government and regulators such as the Independent Schools Inspectorate, the Department for Education and local authorities, for example, where we have any safeguarding concerns;
- If you have unpaid fees we may share information about this with any other school, or educational establishment, to which you intend to send your child;
- On occasion, we may need to share information with the police or other law enforcement authorities, our legal advisors and/or our insurers; and
- If your child has an educational guardian, we may need to share information with them and/or with any homestay appointed to provide accommodation.

You have the following rights regarding your personal data:

- correction of information held;
- access to information held;
- deletion of information in certain circumstances;
- portability - the transfer of information to you or a third party;
- restriction of the use of information; and
- the right to object to the use of information in certain circumstances.

These rights are explained in more detail in the Overarching Data Protection Policy, and the Data Protection Lead can give you more information. The rights don't apply in all cases and are subject to exemptions.

We strongly recommend reading our Overarching Data Protection Policy which is published on the School's website. You can also obtain a copy of the Overarching Data Protection Policy by contacting the School on:

Hunter Hall School
Frenchfield
Penrith
Cumbria
CA11 8UA
office@hunterhall.cumbria.sch.uk
01768891291

The full version includes additional points, such as:

- further information on the purposes for which we use your information;
- for how long the School retains your personal data; and
- our lawful bases for using your personal data.

The Data Protection Lead is the person responsible at our school for managing how we look after personal data. The Data Protection Lead can answer any questions which you may have about how we use your personal data.

Parent Privacy Notice

Introduction

This notice is to help you understand **how** and **why** we collect personal data about you and **what** we do with that information. It also explains the decisions that you can make about your information.

If you have any questions about this notice please contact the Data Protection Lead.

What is "personal data"?

Personal data is information about you from which you can be identified (either directly or indirectly).

This includes your contact details, emergency contact details and financial information. CCTV images, photos and video recordings of you are also your personal data.

Where we get your personal data from and who we share it with

We obtain your personal data from a number of different sources. We get a lot of information from you (e.g. when you complete the registration form). We also get information from other sources such as our teachers, your child, your child's previous school(s), other members of your family, other pupils and their parents, as well as from people outside of the School.

We may also get information about you from government and from regulators, for example, from the local authority.

We will also share information with these people and organisations where appropriate. For example, if you tell us about something that has happened at home, we will share this with your child's teachers if relevant.

The sections below contain further information about where we get your personal data from and with whom it is shared.

Why we use your personal data and the lawful bases

We use your personal data in order to:

1. Carry out our obligations and enforce our rights under our contract with you;
2. Teach your child and our other pupils;
3. Look after your child and others, such as, other pupils and staff;
4. Help the School to comply with its legal obligations, to assist with the management and operation of the School, and to advance and protect the School's interests, objects and reputation; and
5. Fundraise, market and promote the School. For example, by writing to you about fundraising for a new school project.

Our lawful bases for using your personal data are as follows:

- **Contract:** We will need to use your personal data in order to perform our obligations under our contract with you and for you to perform your obligations as well. For example, we need your name and contact details so that we can update you on your child's progress. We

may also rely on this basis where you have asked us to do something before entering into a contract with us. If we do not have a contract with you (i.e. if you are not a party to the School's parent contract) we will not rely on the contractual basis to use your information.

- **Legitimate interests:** This means that the School is using your personal data where this is necessary for the School's legitimate interests or someone else's legitimate interests.
    - Specifically, the School has a legitimate interest in:
        - educating and looking after its pupils;
        - complying with its contract with you for your child to be at the School;
        - 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;
        - investigating if something has gone wrong; and
        - protecting, promoting and improving the School.
    - This lawful basis only applies where our legitimate interests are not overridden by your interests, rights and freedoms. This basis applies to all of the 5 purposes listed above.
- **Public task:** This allows the School to use your personal data where doing so is necessary in order to perform a task in the public interest or to exercise one of our functions or powers as a school. This basis applies to purposes 2, 3 and 4 above. For example, when we use your personal data to look after your child.
- **Legal obligation:** The School might need to use your personal data to comply with a legal obligation. For example, to report a concern about your child's wellbeing to Children's Services or in relation to inspections. Occasionally we may have a legal obligation to share your personal data with third parties such as the courts, local authorities and/or the police. More detail of when we will do so is set out below.
- **Vital interests:** In limited circumstances we may use your personal data to protect your vital interests or the vital interests of someone else. For example, to prevent someone from being seriously harmed or killed.

The section below contains more information about our purposes for using your personal data and the lawful bases.

Our purposes and lawful bases in more detail

This section contains more detail about the purposes for which your personal data is used, the applicable lawful bases as well as further information about sources and recipients. It does not say anything different to what is set out above but does go into more detail.

We have also used a colour coded system so that you can see which bases we are relying on for each of the purposes described at paragraphs 1 to 49 below. LI means legitimate interests, CT means contract, PI means public task, LO means legal obligation and VI means vital interests. So (LI, PI) means that we are relying on both legitimate interests and public task for that purpose.

1 The School's primary reason for using your personal data is to provide educational and pastoral services to your child (LI, CT, PI).

2 We will use information about you in order to process your application for your child's admission to the School. We obtain information about you from the admissions forms and from your child's previous school(s). We may also get information from professionals such as doctors and local authorities (LI, CT, PI).

3 We will have information about any family circumstances which might affect your child's welfare or happiness. This is to help us provide appropriate care and support to your child (LI, CT, PI).

4 We may use medical information about you if we need this to look after your child (LI, CT, PI).

5 We will need information about any court proceedings, court orders or criminal petitions which relate to you. This is so we can safeguard the welfare and wellbeing of your child and the other pupils at the School (LI, CT, PI).

6 We use CCTV to help make the School site is safe and for crime detection and prevention. We may also use CCTV in relation to complaints and any incidents which take place on our sites (e.g. accidents involving vehicles in our car park(s)). Images captured of you via CCTV will be your personal data. CCTV is not used in private areas such as toilets or changing rooms (LI, CT, PI, LO). For more information about our use of CCTV please see our CCTV Policy.

7 We will use your personal data to take other steps to make sure the School site and buildings are safe, for example, we keep a record of visitors to the School site at any given time (LI, PI, LO).

8 If there is a complaint or grievance made to the School that involves you, then we will use your personal data in connection with that complaint or grievance (LI, PI).

9 The School may share information about you with the local authority for the purpose of the preparation, implementation and / or review of your child's Education and Health Care Plan (LI, PI, LO).

10 Where appropriate, the School will have information about your religious beliefs or other beliefs and practices. For example, if you do not eat certain foods (LI, PI).

11 We will also hold information such as your ethnic group for the purposes of completing the government census (LO).

12 We may use your personal data in order to help make the School better, for example, to raise money for the School (LI).

13 We may take photos or images (including video recordings) of you at School events to use on social media and on the School website. This is to show prospective parents and pupils what we do here and to advertise the School. We may continue to use these photos and videos after your child has left the School (LI).

14 We will send you information to keep you up to date with what is happening at the School. For example, by sending you information about events and activities taking place (including fundraising events) and the School newsletter (LI).

15 We will keep details of your address when your child leaves the School so we can find out how your child is progressing (LI).

16 We may use your personal data when ensuring network and information security, for example, our anti-virus software might scan files containing information about you (LI).

17 We monitor our pupils' use of the internet and any internet based platform, and email as part of our safeguarding duties. On occasion, this may involve your personal data, e.g. if you have sent your child a message to their academy email address (PI).

18 We also keep some information indefinitely for archiving purposes (this is known as "archiving in the public interest" under data protection law) and for historical research purposes.

18.1 This includes the School's legitimate interest in research; supporting long-term accountability; enabling the discovery and availability of the School and the wider school community's identity, memory, culture and history; enabling the establishment and maintenance of rights and obligations and of precedent decisions; educational purposes; and commercial and non-commercial re-use.

18.2 For example, we keep some old photos so that we have a record of what the School was like in the past. Information held in our archive may be made publicly available but this would only be done in compliance with data protection laws (LI, PI).

19 We may use your personal data in connection with legal disputes, for example, we may have to disclose your personal data as part of court proceedings (LI, PI, LO).

Financial information

20 We will process information about you in relation to the payment of fees and for risk management and compliance purposes. In some cases we get information about you from third parties such as credit reference agencies or from your child's previous school(s) (LI, CT).

21 We may ask you for evidence of your identity e.g. copy of a driving licence or passport. This is so that we have a record of who is paying the fees for anti-money laundering purposes (LI).

22 We will hold information about bankruptcy petitions and statutory demands, where relevant (LI, CT).

23 We may search the files of any licensed credit reference agency in order to verify your identity. This also allows us to assess your application for the award of a bursary or for credit in contemplation of an agreement for the deferment of fees. The credit reference agency will keep a record of that search and details about your application. This record will be seen by other organisations which make searches about you (LI, CT).

24 We may share your personal data with debt recovery suppliers if you do not pay any fees or other sums owed to the School (LI, CT).

25 We may obtain information about you from publicly available sources, such as Companies House and Zoopla, to verify your identity or other personal details and assess your ability to pay School fees (LI, CT).]

26 If you apply to the School for a bursary, we will use the information that you provide to assess your application (LI, CT).

Sharing personal data with others

27 We will share information with local authorities, [• the Independent Schools Inspectorate / Ofsted] and the Department for Education. For example, where we have any safeguarding concerns or to comply with our legal obligations. These organisations may also provide information to us for these purposes (LI, LO, PI).

28 On occasion, we may need to share your personal data with the police, or other law enforcement authorities, for the prevention or detection of crime or the apprehension or prosecution of offenders. We will only do this in specific circumstances to assist the police with their investigations (LI, CT, LO, PI).

29 We may need to share information about you with the Health and Safety Executive (a government organisation) if there is a health and safety issue at the School (LI, LO, PI).

30 In certain circumstances, we may also need to share information with our legal advisers for the purpose of obtaining legal advice (LI, LO, PI).

31 Occasionally we may use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly (e.g. our accountants). We will share your personal data with them if this is relevant to their work (LI, CT, PI).

32 We may share information about you with (and get information from) health authorities, providers of healthcare services and healthcare professionals, for example, in relation to pupil immunisations. (LI, PI).

33 If your child is not a British or Irish national, we have to make sure that your child has the right to study in the UK. Sometimes the government will ask us to provide information as part of our reporting requirements. (LI, CT, LO, PI).

34 The School is a charity which means that in exceptional circumstances we may need to share your personal data with the Charity Commission e.g. in the event of a serious incident (LI, LO, PI).

35 We may share some information with our insurance company to make sure that we have the insurance cover that we need or in connection with an actual or possible claim (LI, PI).

36 If the School is dealing with a request for information, query, complaint or grievance (e.g. from another parent), we may need to share your personal data with other parties if it is relevant and appropriate to do so. For example, with the appropriate staff, pupil or parent involved and governors (LI, PI).

37 If you have unpaid fees we may share information about this with other schools or educational establishments to which you propose to send your child (LI).

38 If your child leaves us to attend another school we may provide that school with information about you. For example, details of family circumstances if there have been any safeguarding incidents (LI, LO, PI).

39 We may share information about you with others in your family, such as another parent or step-parent. For example, where this is part of our obligation to take care of your child, as part of our wider legal and regulatory obligations, or in connection with school fees (LI, PI).

40 We may need to share information if there is an emergency, for example, if you are hurt whilst on School premises (LI, VI).

41 If you have appointed an agent to act on your behalf, we may share information with them. For example, we may send letters to them so that they can pass these on to you (LI).

42 If you have appointed an educational guardian (and/or there are homestay arrangements) for your child, we may share your personal data with them (LI).

43 If your child has an Education and Health Care Plan (**EHCP**), we will share information with and obtain information from the local authority about you (LO, PI).

44 If ever in the future, we are considering restructuring the charity which operates the School, we may share your personal data with the other parties involved and with the relevant professional advisors (LI).

45 Some of the records the School keeps and which contain your personal data may be used by the School (or by someone else such as the government) to check that the School has been a good school (LI, PI).

46 We will share your personal data with the governors of the School if it is something they should be aware of, or the information will enable them to fulfil their role as a governor. For example, if there is a concern involving you or your child or something which affects the running of the School (LI, PI).

As you will see from the above, in some cases we will rely on more than one lawful basis for a particular use of your information.

We use service providers to handle personal data on our behalf for the following purposes:

- we engage IT consultants who might access information about you when checking the security of our IT network;
- we use software, apps and websites to help us with teaching, and to help us provide pastoral support to our pupils; and
- we use third party "cloud computing" services to store some information rather than the information being stored on the School site.

Anyone that we share information with may give us information about you as well.

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

Consent

We may ask for your consent to use your information in certain ways as an alternative to relying on any of the lawful bases above (e.g. LI or PI). For example, we may ask for your consent to send you information about our fundraising projects by email.

If we ask for your consent to use your personal data you can take back this consent at any time. Any use of your personal data before you withdraw your consent remains valid.

You can speak to the Data Protection Lead if you would like to withdraw any consent given.

Sending information to other countries

When the School sends personal data outside of the UK, we have to consider if the other country has the same level of protection for personal data as there is in the UK. Some countries are considered by the UK Government to have adequate rules and this includes all of the European Economic Area and some other countries, such as, New Zealand, Argentina and Switzerland.

The School sends your personal data to countries with adequate rules when we:

- store your personal data in cloud computer storage with servers in Ireland.

In certain circumstances, we may send your personal data to countries which do not have the same level of protection for personal data as there is in the UK. For example, we may:

- store your personal data on cloud computer storage based in the USA.

We will provide you with additional details about where we are sending your personal data, whether the country has an adequacy finding and if not the safeguards which we have in place outside of this privacy notice.

If you have any questions about the safeguards that are in place please contact the Data Protection Lead.

For how long do we keep your personal data?

We keep your personal data for as long as we need to in order to educate and look after your child. We will keep a lot of information after your child has left the School, for example, so that we can find out what happened if you make a complaint.

In some cases we may keep your personal data for a longer time than usual but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

Please see our Information and Records Retention Policy for more detailed information.

What decisions can you make about your information?

- **Correction:** if information the School holds about you is incorrect or incomplete you can ask us to correct it.
- **Access**: you can also ask what information we hold about you and to be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about you, where it came from and who we have sent it to.

- **Deletion**: you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.
- **Portability**: you can request the transfer of your personal data to you or to a third party in a format that can be read by computer.
- **Restriction**: you can request that we restrict how we use your personal data in certain circumstances.
- **Object**: you may object to us using your personal data where:
  - we are using it for direct marketing purposes (e.g. to send you an email about a fundraising opportunity);
  - the lawful basis on which we are relying is either legitimate interests or public task. Please see the section "The purposes for which we use your personal data and the lawful bases" above; and
  - if we ever use your personal data for scientific or historical research purposes or statistical purposes.

Some of these rights don't apply in all cases. For example, if you ask us to delete your personal data then in some cases we will not need to comply with your request.

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

Further information and guidance

The Data Protection Lead is the person responsible at our school for managing how we look after personal data and deciding how it is shared.

Like other organisations we need to keep your personal data safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.

This privacy notice does not, and is not intended to, give you any rights which you did not already have. For example, it does not give you any additional contractual rights.

Please speak to the Data Protection Lead if:

- you would like to exercise any of your rights listed above; or
- you would like us to update the information we hold about you; or
- you would prefer that certain information is kept confidential. Please note that there will be occasions when your expectation of confidentiality is overridden by the School's other obligations e.g. if we need to share information for safeguarding reasons.

If you fail to provide certain information when requested, we may not be able to perform our obligations under the contract we have entered into with you. We may also be prevented from complying with our legal obligations (such as to ensure the welfare of your child and their classmates). Failing to provide information may also adversely affect the education and care we are able to provide to your child.

You have a right to lodge a complaint with the Information Commissioner's Office (ico.org.uk). If you do have any concerns about how we have handled your personal data we would kindly ask that you

contact us in the first instance before you speak to the ICO so that we have an opportunity to put things right.

Last Updated: 30 April 2024