



THE STUDY PREPARATORY SCHOOL PRIVACY NOTICE

INTRODUCTION AND WHO WE ARE

The Study Preparatory School (“the School”) is a limited company (Company n°1229741) and charity (Charity n°271012). Our registered address is 4 Peek Crescent, London, SW19 5ER. We are an independent preparatory school.

We are the data controller for the purpose of the General Data Protection Regulation (EU 2016/679), the UK Data Protection Act 2018, and supporting legislation.

This policy is to help prospective and current parents understand how and why the School collects personal information and what the School does with that information. It also explains what decisions a parent can make about their own information.

This **Privacy Notice** applies alongside any other information the School may provide about a particular use of personal data, for example when collecting data via an online or paper form.

If you have any questions about this Privacy Notice, please contact the Bursar.

We have separate Privacy Notices for staff and for alumnae.

RESPONSIBILITY FOR DATA PROTECTION

The School has appointed The Bursar as Privacy and Compliance Officer who will deal with all your requests and enquiries concerning the school’s uses of your personal data (see section on Individual Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law. The Bursar can be contacted by emailing bursar@thestudyprep.co.uk.

TYPES OF PERSONAL DATA COLLECTED AND USED BY THE SCHOOL

Generally, the School receives personal data from the individual directly (including, in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments).

However in some cases personal data may be supplied by third parties (for example another School, or other professionals or authorities working with that individual); or collected from publicly available resources

Set out below are examples of different types of personal data collected by School and where this comes from.

- names, addresses, telephone numbers, e-mail addresses and other contact details provided in admission forms
- bank details and other financial information provided by parents who pay School fees
- additional financial information such as credit references and information relating to payment of School fees will be requested by the School where applicable
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks provided by the pupils' former schools;
- references given or received by the School about pupils, and information provided by previous educational establishments and/or other professionals or organisations working with pupils
- where appropriate, information about pupil's health, and contact details for their next of kin. This information is provided in pupil admission forms;
- correspondence with and concerning staff, pupils and parents past and present
- images of pupils (and occasionally other individuals) engaging in School activities, and images captured by the School's CCTV system (in accordance with the School's policy on taking, storing and using images of children and CCTV policies);
- car details (about those who use our car parking facilities);
- personnel files, including in connection with academics, employment or safeguarding;
- where appropriate, information about individuals' health and welfare, and contact details for their next of kin;

HOW AND WHY THE SCHOOL NEEDS TO COLLECT AND USE PERSONAL INFORMATION

In order to carry out its ordinary duties to staff, pupils and parents, the School may process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of its daily operation.

Some of this activity the School will need to carry out in order **to fulfil its legal rights**, duties or obligations – including those under a contract with its staff, or parents of its pupils. Examples of this include where the School needs to use personal information about a pupil and/or her parents to report a safeguarding concern to Children's Services, the police or local authority.

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

The School expects that the following uses may fall within the category of legitimate interests:-

- For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents);
- To provide education services, including musical education, physical training or spiritual development, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Maintaining relationships with alumni and the School community, including direct marketing or fundraising activity;
- For the purposes of management planning and forecasting, research and statistical analysis;
- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate;

- To give and receive information and references about past, current and prospective pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the School;
- To safeguard pupils' welfare and provide appropriate pastoral care;
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's E-Safety Policy;
- To make use of photographic images of pupils within the School, for example in class, for school displays and exhibitions, for relevant academic work, in communications within the School community, and for the security and welfare of pupils.
- For security purposes, including CCTV in accordance with the School's CCTV policy; and
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School.

In addition, the School will on occasion need to process 'sensitive personal data' regarding individuals. This includes information about a person's physical or mental health, race or ethnic origin, political or religious beliefs, trade union membership or criminal records and proceedings. Sensitive personal data is given special protection under Data Protection law and will only be processed by the School with the explicit consent of the individual or as otherwise permitted by the law.

These reasons will include:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs;
- To provide educational services in the context of any special educational needs of a pupil;
- To provide spiritual education in the context of any religious beliefs;
- In connection with employment of its staff, for example DBS checks, welfare, union membership or pension plans;
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are SEND, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

Some data processing will be carried out by the School based on **consent**, for example the use of photographic images of pupils on the School website, in accordance with the School's Photographic Image Usage Consent Form and the School's Taking Storing and Using Pupil Images Policy. Consent may be withdrawn at any time, by contacting the School.

WHO HAS ACCESS TO PERSONAL DATA AND SHARING PERSONAL INFORMATION WITH THIRD PARTIES

For the most part, personal data collected by the School will remain within the School, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). However, a certain amount of any SEN pupil's relevant information and any pupil's relevant medical information, for example concerning allergies will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

Occasionally, the School will need to share personal information with third parties in accordance with its legal or contractual obligations or as part of the School's legitimate interests. Examples of this include:-

- Sharing information with local authorities, the Independent Schools Inspectorate and/or the Department of Education where for example there are any safeguarding concerns
- Sharing information with the police
- Sharing information with legal advisers to obtain legal advice
- Sharing information with UK Visas and Immigration if a pupil is not a British national to ensure they have the right to study in the UK
- Sharing information with the School's insurance company if there is a serious incident at the School
- Sharing the fact of any unpaid fees with other Schools
- Sharing any relevant information to other schools a child may attend – for example details of family circumstances for safeguarding

The School is under duties imposed by law and statutory guidance to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This may include file notes on pupil or safeguarding files, and in some cases referrals to relevant authorities such as the local authority or police. For further information about this, please view the School's Safeguarding Policy. In addition, the School has a policy of recording low level pastoral care issues regarding children's welfare.

Finally, in accordance with Data Protection Law, some of the School's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the School's specific directions.

HOW LONG WE KEEP PERSONAL DATA

The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Details of how long the School will keep different types of personal data are set out in the School's **Records Retention** Guidelines

KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

The School will use the contact details of parents, alumni and other members of the school community to keep them updated about the activities of the School, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Details of how the School will process alumnae data are set out in the **Study Prep Alumnae Privacy Notice**. Subject to parental consent, the School may also share parent email contact details with The Study Association

Should you wish to limit or object to any such use, or would like further information about them, please contact the Bursar in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the School may need nonetheless to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

INDIVIDUAL'S RIGHTS

You have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require us to correct the personal data we hold about you if it is incorrect;
- to require us (in certain circumstances) to erase your personal data;
- to request that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

You may exercise these rights by contacting the Bursar. Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. The school will endeavour to respond to any such requests as soon as is reasonably practicable and in any event within statutory time-limits (which is generally one month, but actually fulfilling more complex or multiple requests, e.g. those involving third party information, may take 1-2 months longer).

CONSENT

Where the School is relying on consent as a means to process personal data, any person may withdraw this consent at any time. Please be aware however that the School may have another lawful reason to process the personal data in question even without your consent.

That reason will usually have been asserted under this Privacy Notice, or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because a purchase of goods, services or membership of an organisation such as an alumni or parents' association has been requested).

DATA ACCURACY AND SECURITY

The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify the School of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the School may need to process your data, of who you may contact if you disagree.

The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to School systems. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to the Bursar, bursar@thestudyprep.co.uk.

If an individual believes that the School has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the School's Complaints procedure and should also notify the Bursar. There is also the right to lodge a complaint with the Information Commissioner's Office at <https://ico.org.uk/concerns>

Reviewed: June 2020