



QUEEN'S COLLEGE PREPARATORY SCHOOL

FULL PUPIL PRIVACY NOTICE, FEBRUARY 2018

Introduction

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

We are giving you this notice because you are able to exercise your daughter's data protection rights on their behalf. When your daughter 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 Bursar.

What is "personal information"?

Personal information is information that Queen's College Preparatory School holds about your daughter and which identifies your daughter.

This includes information such as their date of birth and address as well as things like assessment results, medical details and behaviour records. Queen's College Preparatory School may also hold information such as your daughter's religion or ethnic group for the purpose of equal opportunities monitoring. CCTV, photos and video recordings of your daughter are also personal information.

How and why does Queen's College Preparatory 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.

1. Our primary reason for using your daughter's information is to provide your daughter with an education.
2. Queen's College Preparatory School will also use your daughter's personal information to safeguard and promote your daughter's welfare and the welfare of others (for example, so that we can look after you daughter if they are hurt).

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

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

3. We will use information about your daughter during the admissions process e.g. when marking entrance assessments and considering any information provided on the registration form. We will let your daughter's previous school know if they have been offered a place at the Prep School and request a reference from them.

4. We need to tell all appropriate members of staff if your daughter is allergic to something or has a health issue.
5. We will tell your daughter's teachers if she has special educational needs or requires extra help with some tasks.
6. We will need to share information about your daughter (e.g. about their health and wellbeing) with the staff in the School Office and the College Nurse.
7. Where appropriate, Queen's College Preparatory School will have information about your religious beliefs and practices. For example, if your daughter does not eat certain foods.
8. We use CCTV to make sure the Queen's College Preparatory School site is safe. CCTV is not used in private areas such as bathrooms and classrooms where pupils change for PE and Games.
9. We record your daughter's attendance and if she has time away from the Prep School we record the reason(s) why.
10. We will need to report some of your daughter's information to the government (e.g. the Department for Education). We will need to tell the local authority that your daughter attends or leaves Queen's College Preparatory School and let them know if we have any concerns about your daughter's welfare.
11. We may need to share information about your daughter with the Health and Safety Executive (a government organisation) if there is a health and safety issue at Queen's College Preparatory School.
12. Queen's College Preparatory School is a charity which means that in exceptional circumstances we may need to share your daughter's information with the Charity Commission e.g. in the event of a serious incident.
13. When we are inspected by the Independent Schools Inspectorate we will have to make your daughter's information available to the inspectors to assist them with their inspection.
14. If Queen's College Preparatory School receives a complaint or grievance which involves your daughter we will need to use their information to deal with this appropriately. For example, if you make a complaint or if another parent complains about an issue which involves your daughter.
15. We are legally required to provide the Department for Education with certain information about your daughter. Some of this information will be stored on the National Pupil Database. Organisations can request information from the National Pupil Database which includes information about your daughter. But they are only allowed to do this for limited purposes and they must be very careful about how they use your daughter's information. More information can be found here - <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>
16. We will need information about any court orders or criminal petitions which relate to your daughter. This is so that we can safeguard your daughter's welfare and wellbeing and the other pupils at Queen's College Preparatory School.

17. If your daughter is from another country we have to make sure that they have the right to study in the UK. Sometimes the government will ask us to provide information as part of our reporting requirements. In addition to this we have a duty to provide information about your daughter to UK Visas and Immigration.
18. Depending on where your daughter will go when they leave us, we will provide their information to other schools and colleges. For example, we may share information about your daughter's assessment results and provide references if requested. If your daughter has a safeguarding file, we are legally required to pass this file to their next school.
19. If your daughter takes entrance examinations for Senior Schools we will need to share information about them with the schools to which she has applied . For example, if your daughter requires extra time in exams.
20. We may need to share information with the police or our legal advisers if something goes wrong or to help with an enquiry. For example, if one of your daughter's classmates is injured at Queen's College Preparatory School or if there is a burglary.
21. We use consultants, experts and other advisors to assist Queen's College Preparatory School in fulfilling its obligations and to help run the School properly. We will share your daughter's information with them if this is relevant to their work.
22. If your daughter has misbehaved in a serious way, and the police have become involved, we will need to use information about the action taken by the police.
23. We may share some information with our insurance company to make sure that we have the insurance cover that we need.
24. We will share your daughter's academic and (where fair) their behaviour records with you or their education guardian so you can support their schooling.
25. We may share information about your daughter with Queen's College, London. For example, how well your daughter has behaved at Queen's College Preparatory School and their assessment results.
26. We will monitor your daughter's use of email, the internet and mobile electronic devices e.g. iPads. This is to check that your daughter 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 acceptable use of IT policy or speak to your daughter's Form Teacher.
27. We will request permission on an annual basis to use photographs or videos of your daughter for the School's website and social media sites or prospectus to show prospective pupils what we do here and to advertise Queen's College Preparatory School. We may continue to use these photographs and videos after your daughter has left the Prep School.
28. Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.
29. We publish our Senior School entrance examination 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.

30. We will keep details of your daughter's address when they leave so we can send them Alumnae Association communications and find out how they are getting on. We may also pass their details onto the alumni organisation which is called 'The QCPS Society'. Further information on the alumni association can be found here www.qcps.org.uk/welcome/the-qcps-society

31. Queen's College Preparatory School must make sure that our computer network is working well and is secure. This may involve information about your daughter, for example, our anti-virus software might scan files containing information about your daughter.

We will only share your daughter'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 sometimes use contractors to handle personal information on our behalf. The following are examples:

- IT consultants who might access information about your daughter when checking the security of our IT network; and
- we use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the School site.

If you have any concerns about the above, please speak to the Bursar.

Our legal grounds for using your daughter's information

This section contains information about the legal basis that we are relying on when handling your daughter's information as described above.

Legitimate interests

This means that Queen's College Preparatory School is using your daughter's information when this is necessary for the School's legitimate interests or someone else's legitimate interests.

We won't rely on this ground when your daughter's interests and fundamental rights override our legitimate interests. Specifically, Queen's College Preparatory School has a legitimate interest in:

- Providing your daughter and other children with an education and making sure that your daughter is behaving properly.
- Complying with our agreement with you for your daughter to be at Queen's College Preparatory School.
- Keeping the school buildings safe.
- Making sure that Queen's College Preparatory School is well managed and that we protect the School's reputation.
- Safeguarding and promoting your daughter's welfare and the welfare of other children.
- Promoting the objects and interests of Queen's College Preparatory School. This includes fundraising e.g. if we want to raise money to improve our facilities and using photographs of your daughter in promotional material such as on our website and in the prospectus.

- Ensuring that all relevant legal obligations of Queen's College Preparatory School are complied with (for example in relation to inspections).
- Using your daughter's information in connection with legal disputes.
- Facilitating the efficient operation of Queen's College Preparatory School.

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

Queen's College Preparatory School is relying on our legitimate interests for all of the 31 purposes listed above except number 15.

Legal obligation

Where Queen's College Preparatory School needs to use your daughter's information in order to comply with a legal obligation, for example to report a concern about your wellbeing to Children's Services. We will also have to disclose your daughter's information to third parties such as the courts, the local authority or the police where legally obliged to do so.

Legal obligation is relevant to the following purposes listed above: 10, 11, 12, 13, 15, 17, 19, 21 and 23.

Vital interests

In limited circumstances we may use your daughter's information to protect your daughter's vital interests or the vital interests of someone else (e.g. if your daughter or they are seriously hurt).

Performance of a task carried out in the public interest (or carrying out public tasks)

This applies where what we are doing is for the benefit of people generally. The following are examples of where this applies:

- providing your daughter and others with an education;
- safeguarding and promoting your daughter's welfare and the welfare of other children;
- facilitating the efficient operation of Queen's College Preparatory School; and
- ensuring that we comply with all of our legal obligations.

The Prep School is carrying out a public task in respect of all of the 31 purposes listed above except numbers: 15, 29, 30, and 31.

Queen's College Preparatory 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

Queen's College Preparatory School is allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This is similar to "public interest" in the table above. For

example, Queen's College Preparatory School will use information about your daughter's health to look after her. We may also use other types of special category personal data about your daughter to provide them with an education, to look after your daughter and their classmates or when the School is inspected. Queen's College Preparatory School is carrying out a public task in respect all of the 33 purposes listed above except numbers: 28, 29, 30, 31 and 32.

Employment and social protection and social security law

There will be times when Queen's College Preparatory School needs to use your daughter's information because we are an employer. Also the School will use your daughter's information to comply with social protection law (e.g. to look after your daughter) and social security laws. Queen's College Preparatory School is relying on this ground for the following purposes in particular: 2, 6, 10, 19 and 23.

Vital interests:

In limited circumstances we may use your daughter's information to protect your daughter's vital interests or the vital interests of someone else (e.g. if your daughter or, they are seriously hurt).

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. This applies whenever sharing special category data is necessary in relation to legal claims and is relevant to purposes 20 and 23 in particular.

Medical purposes

This includes medical treatment and the management of healthcare services.

This applies to the following purposes especially: 2 and 6.

Criminal offence information

In exceptional circumstances, we may use information about criminal convictions or offences. We will only do this where the law allows us to. This will usually be where such processing is necessary to carry out our obligations and to look after our pupils.

Multiple legal grounds

As you will see from the table above, in some cases we will rely on more than one ground for a particular use of your daughter's information. For example, we will rely on legitimate interests and public interest grounds when using your daughter's information to look after your daughter and her classmates and when providing your daughter with an education.

The ground that we will rely on for a particular purpose may vary depending on the circumstances. For example, if we decide to tell the local authority something about a pupil because we are worried about their welfare, sometimes this will be because we have a legal obligation to do so but on other occasions we may tell the local authority because we are worried about the pupil even if we don't have a legal obligation to report something (in which case we would be relying on legitimate interests and public interests).

Consent

We may ask for your consent to use your daughter's information in certain ways as an alternative to relying on any of the grounds in the table above. If we ask for your consent to use your daughter's personal information you can take back this consent at any time. Any use of your daughter's information before you withdraw your consent remains valid. Please speak to your daughter's Form Teacher if you would like to withdraw any consent given.

Sending information to other countries

We may send your daughter's information to countries which do not have the same level of protection for personal information as there is in the UK. For example, we may store your daughter's information on cloud computer storage based overseas.

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/international-transfers/adequacy/index_en.htm

If the country that we are sending your daughter's 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.

We will provide you with details about 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 Bursar.

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

We keep your daughter's information for as long as we need to in order to educate and look after them. We will keep certain information after your daughter has left the Prep School, for example, so that we can find out what happened if you made a complaint.

In exceptional circumstances we may keep your daughter's information 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.

We can keep information about your daughter 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 Queen's College Preparatory School.

Please see our Information and Records Retention Policy for more detailed information. This can be found on our website here www.qcps.org.uk/the-school/policies.

What decisions can you make about your daughter's information?

From May 2018 you will be able to make various decisions about your daughter's information. Some of these are new rights whilst others build on your daughter's existing rights. Some of your daughter's rights are listed as follows:

- **Rectification:** if information is incorrect you can ask us to correct it.
- **Access:** you can also ask what information we hold about your daughter and 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 your daughter, where it came from and what types of people we have sent it to.

- **Deletion:** you can ask us to delete the information that we hold about your daughter in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your daughter's information to you or to a third party in a format that can be read by computer in certain circumstances.
- **Restriction:** our use of information about your daughter may be restricted to simply storing it in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.
- **Object:** you may object to us using your daughter's information where:
 - we are using it for direct marketing purposes (e.g. to send your daughter the 'Queen's Today' magazine;
 - we are relying on either the legitimate interests or performance of a task carried out in the public interest legal ground to use it - please see the section "Our legal grounds for using your daughter's information" above;
 - we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of your class for historical reasons. The Bursar can give you more information about your daughter's data protection rights.

Further information and guidance

This notice is to explain how we look after your daughter's personal information. The Bursar can answer any questions which you might have.

Please speak to the Bursar if:

- you object to us using your daughter's information for marketing purposes e.g. to send your daughter information about school events. We will stop using your daughter's information for marketing purposes if you tell us not to; or
- you would like us to update the information we hold about your daughter; or
- you would prefer that certain information is kept confidential.

If you consider that we have not acted properly when using your daughter's personal information you can contact the Information Commissioner's Office - ico.org.uk.