



ALDENHAM FOUNDATION

Parent Privacy Notice

**September 2019
by KM**

Parents Privacy Notice

Introduction

The Aldenham Foundation is a “data controller”. This Privacy Notice is to help you understand how and why we collect personal information about you and what we do with it. It also explains the decisions that you can make about your own information.

Data Protection Manager

We have appointed Mr K Mahon, the Bursar as the Foundation’s Data Protection Manager (DPM) to oversee compliance with this Privacy Notice. If you have any questions about this Privacy Notice or how we handle your personal information, please contact the DPM. You have the right to make a complaint at any time to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues.

Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

What is personal information?

Personal information is that which identifies you as an individual and relates to you. This includes your contact details, next of kin and financial information. We may also need to hold information such as your religion or ethnic group. CCTV, photos and video recordings of you are also personal information.

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

Set out below are examples of different ways in which we use personal information and its source. Our primary reason for using your personal information is to provide educational services to your child.

- We obtain information about you from admissions forms and your child's previous school.
- Sometimes when appropriate, we may obtain information from professionals such as doctors or local authorities.
- We may have information about any family circumstances which might affect your child's welfare or happiness.
- We may need information about any court orders which relate to you. This is so that we can safeguard the welfare and wellbeing of your child and other pupils.

- We use CCTV to make the Foundation safe. It is not used in private areas such as changing facilities.
- We may take photographs or videos of you and pupils at events to use on social media, on our website or in other marketing communications. This helps us show prospective parents and pupils what we provide and to promote the Foundation. We may seek specific consent before using a photograph or video recording of parents and pupils where we consider that the use is more privacy intrusive. We may continue to use these photographs and videos after your child has left the Foundation.
- We may send you information to keep you up-to-date with what is happening at the Foundation. For example, by sending you information about events and activities taking place (including fundraising events) and newsletters.
- We may keep details of your address when your child leaves us so we can find out how your child is progressing. We may also pass your details onto the respective alumni organisation. Further information on the alumni association can be found on our website.
- We may use information about you if we need it for historical research purposes or for statistical purposes.

Financial information

- We need to process your financial information in relation to fee payments. In some cases we get information about you from third parties such as credit reference agencies or from your child's previous school(s).
- We may receive and hold information about any bankruptcy petitions and statutory demands.
- 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.

Sharing personal information with third parties

- In accordance with our legal obligations, we may share information with local authorities, the Independent Schools Inspectorate and the Department for Education. For example, where we have a safeguarding concern.
- On occasion, we may need to share information with the police.
- We may need to share information with our legal advisors for the purpose of obtaining legal advice.
- Occasionally we may use consultants, experts and other advisors to assist us in fulfilling our obligations and to help run the Foundation. We might need to share your information with them if this is relevant to their work.

- If your child is not of British nationality we have to make sure they have the right to study in the UK. We might have to provide information about you to UK Visas and Immigration to comply with our duties as a Tier 4 sponsor.
- We may need to share some information with our insurance company. For example, if there is a serious incident.
- If you have unpaid fees while your child is with us we may share information about this with other schools or educational establishments to which you intend to send your child.
- If your child leaves us to attend another school we may need to provide that school with information about you. For example, details of family circumstances for safeguarding reasons.
- We may share information about you with others in your family, such as another parent or step-parent e.g. 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.
- We may need to share information if there is an emergency. If you are hurt whilst on Foundation premises for example.
- We sometimes use contractors to handle personal information on our behalf:
 - IT consultants who might access information about you when checking the security of our IT network.
 - We use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on site.

Your Personal Data collected by us will mostly remain within the Foundation and will be handled only by staff in accordance with access protocols (i.e. on a 'need to know' basis). Particular strict rules apply in the context of:

- Medical records accessed only by the Health Centre and our doctor.
- Pastoral or safeguarding files.

Data Retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity as well as the potential risk of harm from unauthorised use or disclosure of it, the purposes for which we process your personal data, whether we can achieve those purposes through other means, and the applicable legal requirements.

Our legal grounds for using your information

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

Legitimate interests

This means we are using your information when this is necessary for our legitimate interests except when this would be unfair to you. The Foundation relies on legitimate interests for

many of the ways in which it uses your information. Specifically, the Foundation has a legitimate interest in:

- Providing educational services to your child and to other children.
- Safeguarding and promoting the welfare of your child (and other children).
- Providing and receiving information and references about past, current and prospective pupils and to provide references to potential employers of past pupils.
- Promoting the objects and interests of the Foundation. This includes fundraising and using photographs of you and your child at our school events in promotional materials. It also includes making sure that we are able to enforce our rights e.g. so that we can contact you if unpaid school fees are due.

In addition, your personal information may be processed for the legitimate interests of others e.g. another school will have a legitimate interest in knowing if you have not paid our fees.

If you object to us using your information where we rely on our legitimate interests as explained please contact us.

Legal obligation

Where we need to use your information in order to comply with our legal obligations e.g. report a concern to Children's Services. We may have to disclose your information to third parties such as the courts, the local authority or police where legally obliged to do so.

Necessary for a contract

We will need to use your information in order to perform our obligations under our contract with you e.g. we need your name and contact details so that we can update you on your child's progress and so that we can contact you if there is a concern.

Performance of a task carried out public interest

We also rely on the use of your information where it is necessary in the public interest e.g. to provide your child with an education, to look after your child and their classmates, or when the Foundation is inspected.

Vital interests

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

Consent

We may ask for your consent to use your information in certain ways. If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. Please contact us if you would like to withdraw any consent given.

Special Categories

We must also comply with an additional condition where we process special categories of personal information. These special categories are: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership,

genetic information, biometric information, health information, and information about sex life or orientation.

What decisions can you make about your information?

From May 2018 data protection legislation gives you a number of rights. Some of these are new whilst others build on your existing ones. Your rights are as follows:

- If information is incorrect you can ask us to correct it.
- You can also ask what information we hold about you and be provided with a copy. You can ask us to delete the information that we hold about you in certain circumstances e.g. where we no longer need the information.
- You can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer.
- Our use of information about you may be restricted 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.

Further information and guidance

We can answer any questions which you may have. Please speak to us if:

- You object to us using your information for fundraising purposes e.g. to send you information about a fundraising initiative. We will stop using your information for fundraising purposes if you tell us not to.
- You would like us to update the information we hold about you.
- You would prefer that certain information is kept confidential.