



**HOW WE USE YOUR DATA**  
**PRIVACY NOTICE FOR PARENTS**

**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 data. Personal data is data that identifies you and relates to you. For example, data about your family circumstances, your financial data and photographs of you.

We strongly recommend reading the full version of our parent privacy notice below, which is also published on the School's website:  
<https://www.redmaidshigh.co.uk/about-us-school-policies>. The full version includes additional points, such as, the rights you have in your information including what decisions you can make about your data, for how long the School retains your personal data and our legal bases for using your personal data.

The School's primary reason for using your personal data is to provide educational services to your child.

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 data about you from admissions forms/website enquiry forms and from your child's previous school. We may also get data from professionals such as doctors and from local authorities.
- We will have data about any family circumstances which might affect your child's welfare or happiness.
- We will process financial data about you in relation to the payment of fees. In some cases we get data about you from third parties such as credit reference agencies or from your child's previous school(s).
- We may take photographs or videos of you at School events to use on the School's website, social media sites, in press releases, at School open events or in the School prospectus. This is to show prospective parents and 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.
- 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

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activities taking place (including fundraising events) and the School newsletter.

- We may keep details of your address when your child leaves the School so we can invite you to keep in touch with us via our Connect Portal; RHSA Connect.
- We may share your data with Third Parties, such as Parent Pay and Operoo so that we can ask you for permission for your daughter to attend trips and make any payments, if appropriate.

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

- In accordance with our legal obligations, we will share data with local authorities, the Independent Schools Inspectorate and the Department for Education, for example, where we have any safeguarding concerns.
- If you have unpaid fees we may share data about this with other schools or educational establishments to which you intend to send your child.
- On occasion, we may need to share information with the police, our legal advisors and our insurers.

Our Compliance Officer is the person responsible at our school for managing how we look after personal data. They can answer any questions which you may have about how we use your personal data and can be contacted directly at [privacy@redmaidshigh.co.uk](mailto:privacy@redmaidshigh.co.uk)

## 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 data. It also explains the decisions that you can make about your own data.

If you have any questions about this notice please contact the Compliance Officer.

### What is "personal data"?

Personal data is data that identifies you as an individual and relates to you.

This includes your contact details, next of kin and financial data.

### Our legal bases for using your data

This section contains information about the legal bases that we are relying on when handling your data.

The two tables below contain a general description of the different legal bases but we have also used a colour code system so that you can see which bases we are relying on for each of the purposes described at paragraphs 1 to 30 below.

#### Legitimate interests ("LI")

This means that the School is using your data when this is necessary for the School's legitimate interests except when your interests and fundamental rights override our legitimate interests.

Specifically, the School has a legitimate interest in:

- providing educational services to your child and to other children;
- safeguarding and promoting the welfare of your child, other children and our employees;
- promoting the objects and interests of the School. This includes fundraising and using photographs of you at our School events on the School's website, social media sites, in press releases, at School open events or in other promotional material. It also includes 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;
- keeping the school buildings safe;
- using your data in connection with legal disputes. For example, if you or your child bring a claim against the School;
- protecting the School's reputation;
- facilitating the efficient operation of the School; and
- ensuring that all relevant legal obligations of the School are complied with (for example in relation to inspections).

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In addition your personal data may be processed for the legitimate interests of others. For example another school will have a legitimate interest in knowing if you have not paid School fees that are due to us.

#### Necessary for contract ("CT")

We will need to use your 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 and so that we can contact you if there is a concern.

#### Legal obligation ("LO")

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

#### Vital interests ("VI")

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

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

The following are examples of when we use your data to perform tasks in the public interest:

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

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

#### Substantial public interest ("SPI")

The School is also allowed to use special categories of personal data where doing so is necessary in the substantial public interest. This is similar to "public interest" in the table above.

#### Social protection and social security laws

Also the School may use your data to comply with social protection law (e.g. to look after your child) and social security laws. Social protection law is

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concerned with preventing, managing, and overcoming situations that adversely affect people's wellbeing.

#### Vital interests ("VI")

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

#### Legal claims ("LC")

We are allowed to use your data if this is necessary in relation to legal claims. For example, this allows us to share data with our legal advisors and insurers.

## **How and why does the school collect and use personal data?**

We set out below examples of the different ways in which we use personal data and where this personal data comes from. The letters highlighted in different colours below refer to the legal bases we are relying on. Please see the section above for an explanation.

1. The School's primary reason for using your personal data is to provide educational services to your child - **LI**, **CT**, **PI**, **SPI**.
2. 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**, **SPI**.
3. We will need data about any court orders or criminal petitions which relate to you. This is so that we can safeguard the welfare and wellbeing of your child and the other pupils at the School - **LI**, **CT**, **PI**, **SPI**.
4. We use CCTV to make sure the school site is safe and minibus forward facing dashboard cameras to capture any footage in the case of an incident. Images captured of you via CCTV or dashboard cameras will be your personal data. CCTV is not used in private areas such as toilets - **LI**, **CT**, **PI**, **SPI**.
5. The School use vehicle registration plate recognition software to enter the site freely through the barrier. - **LI**, **PI**, **SPI** If there is a complaint or grievance made to the School which involves you then we will use your data in connection with that complaint or grievance - **LI**, **PI**, **SPI**.
6. The School may share data about you with the local authority for the purpose of the preparation, implementation and / or review of your child's Education Health and Care Plan - **LI**, **PI**, **LO**.
7. Where appropriate, the School will have data about your religious beliefs and practices in so far as they might affect your involvement in school activities such as the Head's suppers. For example, if you do not eat certain foods - **LI**, **SPI**.]

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8. We may take photographs or videos of you at School events to use on the School's website, social media sites, in press releases, at School open events or in other promotional material. This is to show prospective parents and 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 - **LI**.
9. 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**.
10. We may keep details of your address when your child leaves the School so we can invite you to keep in touch with the school via our alumnae system; RHSA Connect. If you accept the invitation and join our virtual community you will be able to manage your subscription and mailing preferences directly. - **LI**.]
11. We may use data about you if we need this for historical research purposes, statistical purposes, or to further develop our school's Archive to promote its history. As such, we can keep data about you for a very long time. For example, if we consider the data might be useful if someone wanted to write a book about the School - **LI**.
12. We may use your data when ensuring network and information security, for example, our anti-virus software might scan files containing data about you - **LI**.

#### Financial data

13. We will process financial data about you in relation to the payment of fees. In some cases we get data about you from third parties such as credit reference agencies or from your child's previous school(s) - **LI, CT**.
14. We will hold data about bankruptcy petitions and statutory demands, where relevant - **LI, CT**.
15. We may search the files of any licensed credit reference agency or a due diligence identity database 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**.
16. We may share your data with debt recovery suppliers if you do not pay any school fees owed to the School - **LI, CT**.

Failure to supply data may result in a refusal of an award or credit.

## Sharing personal data with third parties

17. In accordance with our legal obligations, we will share data with local authorities, the Independent Schools Inspectorate and the Department for Education, for example, where we have any safeguarding concerns or to comply with our legal obligations - **LI, LO, PI, SPI**.
18. On occasion, we may need to share your data with the police for the prevention and investigation of crime and the prosecution of offenders. We will only do this in specific circumstances to assist the police with their investigations - **LI, CT, LO, PI, SPI**.
19. We may need to share data 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, SPI**.
20. In certain circumstances, we may also need to share data with our legal advisers for the purpose of obtaining legal advice - **LI, LO, PI, SPI, LC**.
21. 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 data with them if this is relevant to their work - **LI, CT, PI, SPI**.
22. If your child is not of British nationality we have to make sure that your child has the right to study in the UK. Sometimes the government will ask us to provide data as part of our reporting requirements. In addition to this we have a duty to provide data about you to UK Visas and Immigration to comply with our duties as a child student visa sponsor - **LI, CT, LO, PI, SPI**.
23. We may share data about you with our insurance company, for example, where there is a serious incident at the School - **LI, SPI, LC**.
24. If you have unpaid fees we may share data about this with other schools or educational establishments to which you intend to send your child - **LI**.
25. If your child leaves us to attend another school we may provide that school with data about you. For example, details of family circumstances if there have been any safeguarding incidents - **LI, LO**.
26. We may share data 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, SPI**.
27. We may need to share data if there is an emergency, for example, if you are hurt whilst on School premises - **LI, VI**.
28. If you have appointed an agent to act on your behalf, we may share data with them. For example, we may send letters to them so that they can pass these on to you - **LI**.

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29. We may send you data about the School before you accept a place for your child. For example, we may send you a copy of the school prospectus or dates of open events. - **LI**.
30. If your child has an Education and Health Care Plan (EHC), we will share data with and obtain data from the local authority about you - **LO, PI, SPI**.
31. The School is a charity which means that in exceptional circumstances we may need to share your data with the Charity Commission, e.g. in the event of a serious accident - **LO**.
32. We may also share your data with third parties such as peripatetic staff, sports coaches, learning support staff, travel and accommodation providers or host schools and families (in order to appropriately manage residential trips and school exchanges) but would usually do so with your consent for the purpose in question - **LI**.
33. We may share your data with Parent Pay and Operoo so that we can ask you for permission for your daughter to attend trips and make any payments, if appropriate.

We sometimes use contractors to handle personal data on our behalf. The following are examples:

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

We obtain data about you from admissions/enquiry forms and from your child's previous school. We may also get data from professionals such as doctors and from local authorities.

### **Criminal offence data**

We may only use data relating to criminal convictions and offences where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations or to exercise our rights.

Less commonly, we may use data relating to criminal convictions and offences where it is necessary in relation to legal claims, where it is necessary to protect our pupils and you are not capable of giving your consent, or where you have already made the data public.

### **More than one basis**

As you will see from this notice, in some cases we will rely on more than one basis above for a particular use of your data. In addition, we may move from one of the legal bases listed above to another as circumstances change. For example, as a safeguarding matter becomes more serious, we may start to rely

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on legal obligation to share personal data with the local authority in addition to the other legal bases which are noted for safeguarding purposes.

## **Consent**

We may ask for your consent to use your data in certain ways as an alternative to relying on any of the bases in the table above. For example, we may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on legitimate interests or to use any quote provided in a testimonial. If we ask for your consent to use your personal data you can take back this consent at any time. Any use of your data before you withdraw your consent remains valid. Please speak to the Compliance Officer if you would like to withdraw any consent given.

## **Sending data to other countries**

In certain circumstances, we will send your 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 data 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:

[https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en)

If the country that we are sending your data 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 data as there is in the UK. Where appropriate we will put in place additional safeguards.

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 Compliance Officer.

N.B. This section is subject to change due to the BREXIT deal. It will be reviewed once further details are known.

## **For how long do we keep your data?**

We keep your data for as long as we need to in order to educate and look after your child or to provide you with data about relevant services. We will keep some data after your child has left the School, for example, so that we can find out what happened if you make a complaint.

In exceptional circumstances we may keep your 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.

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Please see our Information and Records Retention Policy for more detailed information. This can be found on our website here <https://www.redmaidshigh.co.uk/about-us-school-policies>.

### **What decisions can you make about your data?**

The Data Protection Act 2018 gives you a number of rights regarding your data.

Your rights are as follows:

- **The right to be informed:** this privacy policy gives you clear information about how your data is used and what your rights are.
- **The right to rectification:** if data the School holds about you is incorrect you can ask us to correct it.
- **The right of access:** you can also ask what data we hold about you 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 data about you, where it came from and what types of people we have sent it to.
- **The right to erasure:** you can ask us to delete the data that we hold about you in certain circumstances. For example, where we no longer need the data.
- **The right to data portability:** you can request the transfer of your data to you or to a third party in a format that can be read by computer. This applies where (a) the data has been provided by you; (b) the basis that we are relying on to process your data is consent or contract (please see "Our legal bases for using your data" above); and (c) the data is being processed by us on computer.
- **The right to restrict processing:** our use of data about you may be restricted in some cases. For example, if you tell us that the data is inaccurate we can only use it for limited purposes while we check its accuracy.
- **The right to object:** you may object to us using your data where:
  - a. we are using it for direct marketing purposes (e.g. to send you the School magazine;
  - b. the legal basis on which we are relying is either legitimate interests or performance of a task carried out in the public interest. Please see the section "Our legal bases for using your data" above; and
  - c. we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of you at a School event for historical reasons.

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- **Rights in relation to automated decision making and profiling:** this is when machines/software make decisions based on rules about someone. This is not a process that the School undertakes but it is important to know it is still your right.

The Compliance Officer can give you more information about your data protection rights.

### **Further information and guidance**

The Compliance Officer 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 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 data we get fairly.

This notice is to explain how we use your personal data. The Compliance Officer can answer any questions which you may have.

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 Compliance Officer if:

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

If you fail to provide certain data 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).

If you consider that we have not acted properly when using your personal data you can contact the Information Commissioner's Office - [ico.org.uk](http://ico.org.uk).

**Kate Doarks/Paul Dwyer/Lisa Brown/Richard Bacon April 2021**

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