

## PRIVACY NOTICE FOR PARENTS, PUPILS AND OTHERS

We take your privacy very seriously. Please read this Privacy Notice carefully as it contains important information on who we are, how and why we collect, store, use and share ("process") personal information, your rights in relation to your personal information and how to contact us and supervisory authorities in the event you have a complaint.

When we process your personal information, we are subject to the UK General Data Protection Regulation (UK GDPR). Personal information is information that identifies you as an individual and relates to you, for example, your contact details, financial information, exam results, photos and images captured by CCTV.

The personal information we process about you varies according to who you are. For that reason we have distinguished between the personal information we process about parents and family members, pupils, alumni, visitors, suppliers and job applicants. Please be sure to read the sections of the Privacy Notice which apply to you.

### Who we are

Leweston School ("the School") is an independent school and a registered charity (number 295175) located at Leweston School, Sherborne, Dorset DT9 6EN. The School is administered by its corporate trustee, Leweston School Trust (company number 2041443), of the same address.

### The personal information we collect and use

In the course of running the School and delivering educational services we may collect and use the following personal information about you.

#### Parents<sup>1</sup> and other family members

- Names, addresses, telephone numbers, e-mail addresses and other contact details for parents and next of kin
- Information verifying your identity
- Information about the vehicles of those using our car parking facilities
- Information about members of your family, your family relationships and family circumstances
- Information about court orders or criminal petitions which relate to you
- Information relevant to any complaint made to the School which involves you or your child
- CCTV images of you taken on the School premises and images of you attending School events
- Bank details and other financial information
- Information about your financial background. Some of this information may come from third parties such as credit reference agencies or your child's previous schools or publicly available sources such as Companies House

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<sup>1</sup> 'Parents' includes all those with parental responsibility for a pupil of the School. It also includes current and prospective parents of a pupil of the School.

- Other information provided by you on registration and admissions forms or by your child's previous schools or the local authority
- Health information that you give us or that we receive from third parties such as the local authority or health professionals.

### **Pupils<sup>2</sup>**

- Information verifying your identity including, in the case of international students, copy passports or other evidence of your right to study in the UK
- Information provided about you on registration and admissions forms (such as name, contact details, disabilities, difficulties with work, hobbies and interests, medical information and family circumstances) or by your previous schools (such as achievements and difficulties) or by pupils, teachers and others during the course of your education at the School
- Pupil references given or received by the School and information provided by other educational establishments and/or other professionals or organisations working with pupils or the local authority
- Information about your health or disabilities and information from you, your parents, doctors and other professionals, including personal care information (where appropriate)
- Ethnicity, religion, country of birth and mother tongue
- Information contained in Education, Health and Care Plans or Statements of Special Educational Needs
- Your date of birth
- Information in your academic, disciplinary, admissions and attendance records (including reasons for absences)
- National curriculum assessment results, examination scripts and marks (including assessment, tracking and progress information)
- Information about you which is relevant to any complaint made to the School which involves you
- Information about court orders or criminal petitions which relate to you or your family
- Information relating to your use of email, the internet and mobile electronic devices (including where appropriate its content). For more information please refer to the School's IT Acceptable Use Policy available on the School Portal
- CCTV images taken on the School premises and images of you used for identity purposes or of you engaging in School activities. For more information please see the School's policy on the taking, storing and using images of children.

### **Alumni<sup>3</sup>**

- Names, addresses, telephone numbers, e-mail addresses and other contact details
- The dates when you attended or worked at the School

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<sup>2</sup> 'Pupils' includes current and prospective pupils of the School.

<sup>3</sup> Alumni means those individuals who have been enrolled as Old Antonians.

- Information about your interests and achievements as a pupil
- Information about your further education and/or employment
- Your involvement with us, for example, whether you participate in the School's organisation, events and activities, including volunteering.

#### **Visitors**

- Names and contact details
- Information about the vehicles of those using our car parking facilities
- Purpose of visit and name of person visited.

#### **Suppliers**

- Your name, contact information (including email address, telephone and fax numbers and postal address), job title and employer organisation
- Information to enable us to check and verify your identity
- Your billing, transaction and payment information
- Information to enable us to undertake credit or other financial checks on you.

#### **Job applicants**

- Your name, contact information (including email address, telephone and fax numbers and postal address)
- Details contained in your curriculum vitae, qualifications and references
- Other personal information provided by you.

#### **How we use your personal information**

Our primary reasons for using your personal information are to facilitate the provision of educational services, to safeguard and promote the welfare of pupils and for the administration of the School. These include the more specific reasons below.

#### **Parents**

- To contact and communicate with you or next of kin
- To consider your child's application for admission and to confirm your identity
- To provide appropriate care and support to your child
- To comply with our safeguarding obligations to protect the welfare and well-being of your child and other pupils at the School
- To deal with complaints
- To ensure that we share information with you appropriately and lawfully
- To ensure the School site is safe
- To promote the School internally on display boards and externally in our publications, on social media, on our website and in the press
- To facilitate administration of fees and other expenses
- To assess your ability to pay our fees and any application for deferment of fees or a bursary and to recover unpaid fees
- To meet your dietary requirements and make reasonable adjustments for any disability you may have

- To provide prospective schools with information about outstanding fees and payment history
- For the ongoing administration of the School including management planning and forecasting, research and statistical analysis and as required to meet our legal and regulatory obligations.

### **Pupils**

- To verify your identity
- To administer our registration and admissions processes
- To provide you with an education including through use of online educational platforms, monitoring progress and needs (including special educational needs), participation in internal and external examinations and extra-curricular activities, School trips and work experience
- To provide careers advice
- To ensure your and other pupils' safety, health and wellbeing and provide appropriate care and support including pastoral and medical care and treatment where necessary
- To promote proper behaviour of pupils and deal with complaints and disciplinary matters
- To monitor your use of technology to ensure it is responsible and safe
- To promote the School internally on display boards and externally in our publications, on social media, on our website and in the press including by publication of exam results or pupil achievements
- To promote pupil, site and IT safety
- To ensure that we share information with your parents appropriately and lawfully
- To meet your dietary requirements and make reasonable adjustments for any disability you may have
- To provide prospective schools or employers with references
- For the ongoing administration of the School including management planning and forecasting, research and statistical analysis and as required to meet our legal and regulatory obligations
- To comply with our obligations regarding the right of overseas pupils to study in the UK.

### **Alumni**

- To maintain relationships between alumni and the School
- To keep you updated about the activities of the School and other alumni, including by sending updates and newsletters by post and email
- To encourage and administer your involvement with the School including in relation to the School's organisation, events, activities and volunteering
- To meet your dietary requirements and make reasonable adjustments for any disability you may have when you attend School events.

### **Visitors**

- To administer your visits to the School and ensure site, pupil and staff security.

### **Suppliers**

- To enter into and administer our contracts for the supply of goods and services from you

- To verify your identity and undertake credit or other financial checks on you
- To administer payments to you.

#### **Job applicants**

- To communicate with you in relation to job roles
- To verify your identity, qualifications and experience
- To assess your suitability for job roles.

#### **Who we share your personal information with**

The third parties with whom we may share your personal information include the following.

- Local authorities and the Department for Education in accordance with our legal obligations, for example regarding registration, attendance, safeguarding or educational and health needs
- The Independent Schools Inspectorate in relation to their inspections
- Law enforcement bodies for safeguarding purposes, the prevention and investigation of crime and the prosecution of offenders
- Other emergency services and/or the Health and Safety Executive if there is an emergency or incident at the School
- Suppliers of healthcare and social care
- Consultants, experts, other advisers and suppliers who assist the School in fulfilling its educational, administrative and operational purposes. These include our legal advisers, accountants, IT consultants, third party cloud computing services, online educational platforms, bursary application consultants and debt recovery agents
- UK visas and immigration division of the Home Office regarding a pupil's right to study in the UK if they are not of British nationality
- The Charity Commission where required, for example, if a serious incident has occurred
- Our insurers, for example where there is a potential claim on our insurance policy
- Former or prospective schools or educational establishments, for example, in relation to the offer of a place, exam results, academic and behavioural records, safeguarding issues, references, outstanding fees and payment history
- Examination boards when pupils take public examinations
- Parents, in relation to information about pupils, subject to their entitlement to such information
- Suppliers and other third parties in relation to extra-curricular activities and School trips
- For overseas pupils whose parents live overseas, any appointed guardian, subject to their being entitled to such information
- Any agent appointed to act on behalf of parents who are based overseas
- As necessary to comply with legal or regulatory obligations
- In relation to promotional material with the School community (parents, pupils, staff, governors and alumni).

We will only share personal information when we have a good reason to do so.

### **Whether information has to be provided by you, and if so why**

The provision of your personal information is necessary to enable us to deliver education and related services. If you object to the provision of certain information, we will inform you if it is mandatory. This may be because we need the information to meet a legal obligation, it is required under the Parent Contract or we cannot provide a service without it.

### **Reasons we can collect and use your personal information**

We rely on a number of different lawful bases when we collect and use your personal information.

**Contract:** this allows us to process personal information where necessary for the performance of a contract to which you are a party (or intend to become a party), such as the Parent Contract or a contract with a supplier.

**Legal obligation:** this allows us to process personal information where necessary to comply with a legal or regulatory obligation to which we are subject, such as to report a safeguarding concern, to comply with a court order or to provide information to a branch of local or central government.

**Vital interests:** this allows us to process personal information on those very rare occasions where it is necessary to protect you or someone else from risk of death or serious injury.

**Public task:** this allows us to process personal information where necessary for the performance of a specific task which is in the public interest and set out in law, such as the provision of education or safeguarding.

**Consent:** in limited circumstances, we will not process your personal information without your prior consent, for example, where we use images of pupils for promotional purposes. You can withdraw your consent at any time by contacting our Director of Business Strategy and Operations using the contact details at the end of this notice. Any use of your personal information before you withdraw consent remains valid.

**Legitimate interests:** this allows us to process personal information where necessary for our or another person's legitimate interests except where your privacy interests outweigh these legitimate interests. We rely on this lawful basis for a large part of our processing activities and the legitimate interests which we have identified include the following.

- Providing educational services, extra-curricular activities, School trips, and pastoral and medical care to pupils
- Facilitating the efficient management and operation of the School including by historical and other research and statistical analysis
- Promoting pupils' proper behaviour and dealing with complaints
- Administering pupil registration and admission
- Safeguarding and promoting the welfare of pupils and staff
- Promoting the objects and interests of the School, including through promotional publications and an alumni organisation
- Ensuring site, pupil, staff and IT security and the effective operation of our systems and network

- Using your information in connection with legal disputes, for example if you make a claim against the School
- Protecting the School's reputation
- Ensuring that all relevant legal obligations of the School are complied with, for example in relation to inspections and reporting to the local authority
- The administration of School or alumni events
- Complying with our contractual obligations where you are not a party to the contract
- Exchanging information with other schools, educational institutions and employers.
- We may rely on more than one lawful basis for many of our processing activities.

### **How long your personal information will be kept**

We will not retain your personal information for longer than necessary for the purposes set out in this notice. It follows that our retention periods will vary depending on the type of personal information concerned, for example, CCTV footage will be kept for a much shorter period than pupil files. Our retention periods are generally dictated by the following criteria.

- Statutory requirements
- Department for Education or NHS guidance
- The limitation period within which legal claims may be brought and their duration
- The period within which complaints, challenges and appeals may be brought and their duration
- The period for which your personal information is still being used, for example, to keep you informed about our news and how you can support us or for historical research or statistical purposes.

When it is no longer necessary to retain your personal information, we will delete or anonymise it.

For more detailed information about the School's retention periods please contact the Director of Business Strategy and Operations.

### **Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine need to know it. Those processing your information on our behalf will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### **Transfer of your information out of the UK**

We do not usually transfer your information out of the UK during the course of our general operations. There are some exceptions which include

- Where you ask us to communicate with you overseas, for example, if you are on holiday or live outside the UK

- Where we need to communicate with third parties in relation to a School trip outside the UK
- Where we appoint a non-UK representative to facilitate the admission of non-UK pupils.

We will ensure that any transfers of your personal information outside the UK are made either

- With your consent
- To countries or organisations which are the subject of an EU Commission adequacy decision or a UK adequacy regulation as appropriate
- Subject to an agreement containing the EU's standard contractual clauses or the UK's standard data protection clauses as appropriate or
- Otherwise in compliance with applicable data protection laws.

For more information about the safeguards in place for our transfers of personal information outside the UK, please contact the Director of Business Strategy and Operations.

### **Your rights**

Under applicable data protection laws, you have a number of important rights which you can exercise free of charge. In summary, those include the right to

- Access your personal information and certain other supplementary information that this Privacy Notice is already designed to address
- Require us to correct any mistakes in your information which we hold
- Require the erasure of personal information concerning you in certain situations
- Receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit that information to a third party in certain situations
- Object at any time to processing of personal information concerning you for direct marketing
- Object to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- Object in certain other situations to our continued processing of your personal information, for example, where we process personal information on the basis of 'legitimate interest' and
- Otherwise restrict our processing of your personal information in certain circumstances.

For further information on each of those rights, including the circumstances in which they apply, see the Guidance from the UK Information Commissioner's Office (ICO) on individuals' rights under the UK GDPR available here: <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

If you would like to exercise any of these rights, please

- Contact our Director of Business Strategy and Operations
- Let us have enough information to identify you and, where necessary, verify your identity and
- Let us know the information to which your request relates.



In most cases, a pupil's rights can be exercised by a parent. In some circumstances, we may need a pupil's authorisation to respond to a request relating to their information by a parent.

If you would like to unsubscribe from any promotional or marketing communications you receive from us, please contact our Director of Business Strategy and Operations. It may take up to five working days during term time (or until the fifth working day of a new term if notice is received during a holiday period) for any changes to be implemented. Until that point, our continued use of your information will be lawful.

### **How to complain**

We hope that we can quickly and satisfactorily resolve any query or concern you raise about our use of your information. Please contact our Director of Business Strategy and Operations in the first instance.

You also have the right to complain to the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/>. If you live or work outside the UK but within the EU or EEA, you can also complain to your local supervisory authority.

### **Changes to this Privacy Notice**

We may change this Privacy Notice from time to time. Please check it periodically.

### **How to contact us**

Please contact our Director of Business Strategy and Operations if you have any questions about this Privacy Notice or your data protection rights using the following contact information.

- By email at [worsleyc@leweston.dorset.sch.uk](mailto:worsleyc@leweston.dorset.sch.uk)
- By telephone on 01963210691
- By post at Director of Business Strategy and Operations, Leweston School, Sherborne, Dorset DT9 6EN.

### **Do you need extra help?**

If you would like this notice in another format (for example, audio, large print, braille) please contact us (see 'How to contact us' above).