

## Parent Privacy Notice

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<b>Related Policies, Procedures, and/or Documentation</b>	<ul style="list-style-type: none"> <li>▪ CSF Data Protection Policy</li> <li>▪ CSF Admissions Policy</li> </ul>
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### VERSION HISTORY

Version Number	Amendment(s) Or Formal Review	Date [Month/Year]	Summary of change(s)
1.0	Formal Review	November 2023	Formal Review and Approval at A&R Sub-Committee Meeting
1.1	Update	March 2024	Updated Role Descriptors / Titles; converted to new policy template and structure; reviewed and updated website links.



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## INTRODUCTION

This notice is to help you understand how and why Coventry School Foundation collects personal information about you and what we do with that information. It also explains the decisions that you can make about your own information. If you have any questions about this notice, please contact the Head of your school.

## WHAT IS PERSONAL INFORMATION?

Personal information is information that identifies you as an individual and relates to you. This includes your contact details, next of kin and financial information. We may also 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?

We set out below examples of the different ways in which we use personal information and where this personal information comes from. The Foundation's primary reason for using your personal information is to provide educational services to your child.

- We obtain information about you from admissions forms and from your child's previous school. We may also get information from professionals, such as doctors, and from 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 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 Foundation.
- We use CCTV to make sure the Foundation sites are safe. There is no use of CCTV in private areas such as toilets.
- We may take photographs or videos of your child and / or you at school events to use on social media and on the schools' websites. This is to show prospective parents and pupils what we do here and to advertise our schools. 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 our schools. For example, by sending you information about events and activities taking place (including fundraising events) and the school's newsletter.
- We may keep details of your address when your child leaves the Foundation so we can send you our Alumni Newsletter and find out how your child is progressing. We may also pass your details onto our alumni organisations, which are called Old Wheatleyans/ Bablake Former Pupils, and Old Coventrians for King Henry's. Further information on the alumni associations can be found here: <http://www.bablake.com/526/old-wheatleyans/welcome> or <https://kinghenrys.co.uk/alumni/welcome-to-the-alumni>.



- We may use information about you if we need this for historical research purposes or for statistical purposes.

## FINANCIAL INFORMATION

- We will process financial information about you in relation to the payment of fees. 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 hold information about 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.
- Failure to supply information may result in a refusal of an award or credit.
- We may obtain information about you from publicly available sources such as Companies House and Zoopla to assess your ability to pay School Fees.

## 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 any safeguarding concerns.
- On occasion, we may need to share information with the police.
- We may also 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 our schools in fulfilling their obligations and to help run them properly. 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 that your child has 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 share some information with our insurance company, for example, where there is a serious incident at the School.
- We may share information about you with other schools in the Foundation. For example, financial information or details of family circumstances.
- If you have unpaid fees while your child is at the school, 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 stepparent. 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.



- We may need to share information if there is an emergency, for example, if you are hurt whilst on school premises.

## OUR LEGAL GROUNDS FOR USING YOUR INFORMATION

This section contains information about the legal basis that the Coventry School Foundation is relying on when handling your information.

### Legitimate Interests

This means that the processing is necessary for legitimate interests except where the processing is unfair to you. The Foundation relies on legitimate interests for most of the ways in which it uses your information.

Specifically, the Foundation has a legitimate interest in:

- providing educational services to your child;
- safeguarding and promoting the welfare of your child (and other children);
- promoting the objects and interests of the Foundation. This includes fundraising. 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;
- facilitating the efficient operation of the Foundation; and
- ensuring that all relevant legal obligations of the Foundation are complied with.

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

If you object to us using your information where we are relying on our legitimate interests as explained above, please speak to the Head.

### Necessary for a Contract

We will need to use your information in order to perform our obligations under our contract with you. 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

Where the Foundation needs to use your information 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 information to third parties such as the courts, the local authority or the police where legally obliged to do so.

### Vital Interests

For example, to prevent someone from being seriously harmed or killed.

### Public Interest

The Foundation considers that it is acting in the public interest when providing education.



## SPECIAL CATEGORIES OF PERSONAL INFORMATION

The Foundation must also comply with an additional condition where it processes special categories of personal information. These special categories are as follows: - 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.

### Substantial Public Interest

The processing is necessary for reasons of substantial public interest.

### Vital Interests

To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt or if they are unconscious.

### 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.

### Medical Purposes

This includes medical treatment and the management of healthcare services.

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 this consent remains valid. Please speak to your Head if you would like to withdraw any consent given.

## SENDING INFORMATION TO OTHER COUNTRIES

We may send your information to other countries where:

- We store information on computer servers based overseas; or
- We communicate with you or your child when you are overseas (for example during the summer holidays if you live in a different country, or when your child is on an overseas trip).

The European Commission has produced a list of countries that have adequate data protection rules. The list can be found here: [The European Commission - Rules on International Data Transfers](#)

If the country that we are sending the 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.



**FOR HOW LONG DO WE KEEP YOUR INFORMATION?**

We keep your information for as long as we need to in order to educate and look after your child.

We will keep some information after your child has left the Foundation, for example, so that we can find out what happened if you make a complaint.

In exceptional circumstances, we may keep your 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 you 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 one of our schools.

**WHAT DECISIONS CAN YOU MAKE ABOUT YOUR INFORMATION?**

From May 2018, data protection legislation gives you a number of rights regarding your information. Some of these are new rights whilst others build on your existing rights. 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. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to.
- You can ask us to delete the information that we hold about you in certain circumstances, for example, 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.

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

**FURTHER INFORMATION AND GUIDANCE**

The Heads are the people responsible at the Coventry School Foundation for managing how we look after personal information and deciding how it is shared.

Like other organisations we need to keep your information 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 information that we get fairly.



This notice is to explain how we use your personal information. The Head can answer any questions that you may have.

Please speak to your Head if:

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

If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office: <https://ico.org.uk/>

## **REVIEW, APPROVAL AND PUBLICATION**

The Chief Operating Officer has strategic oversight of this statement which is reviewed every year unless otherwise required owing to a change in policy/legislation or guidance; once reviewed, the policy is presented to the Audit and Risk Sub-Committee for their formal approval.

## **RELATED POLICIES AND PROCEDURES**

This policy may need to be read in conjunction with the following Foundation/School policies:

- CSF Data Protection Policy
- CSF Admissions Policy

And the following Foundation documents:

- Terms and Conditions of the Contract with Parents

And/or with reference to the following legislation or governance provisions:

- UK GDPR and Data Protection Act 2018.

## **APPENDICES**

There are no appendices to this policy.

**END**

