

The Avenue Pre Preparatory School and Nursery

Privacy Notice

Introduction

1. RESPONSIBILITY FOR DATA PROTECTION
2. THIS NOTICE
3. TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL
4. WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA
5. USE OF PERSONAL DATA BY THE SCHOOL
6. KEEPING IN TOUCH AND SUPPORTING THE SCHOOL
7. RIGHTS OF ACCESS TO PERSONAL DATA ("SUBJECT ACCESS REQUEST")
8. EXEMPTIONS
9. WHOSE RIGHTS
10. DATA ACCURACY AND SECURITY
11. QUERIES AND COMPLAINTS

RESPONSIBILITY FOR DATA PROTECTION

- In accordance with the Data Protection Act 1998 ('the Act'), the School has notified the Information Commissioner's Office of its processing activities. The School's Organisation Name is Cantabile Limited and ICO registration number is ZA311575. The school's registered address is 2 Highgate Avenue, Highgate, London, N6 RX
- The School has appointed the Company Secretary as Privacy Officer who will endeavour to ensure that all personal data is processed in compliance with this policy and the Act.

THIS NOTICE

- This notice applies alongside any other information the school may provide about a particular use of personal data, for example when collecting data via an online or paper form. Everyone has rights with regard to the way in which their personal data is handled. During the course of the School's activities it collects, stores and processes personal data about staff, pupils, their parents, suppliers and other third parties, and it is recognised that the correct and lawful treatment of this data will maintain confidence in the organisation and will provide for successful business operations.
- This information is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used. Staff, parents and pupils are all encouraged to read this policy and understand The School's obligations to its entire community.
- This notice is intended to provide information about how the school will use (or "process") personal data about individuals including current, past and prospective pupils; and their parents, carers or guardians (referred to in this policy as "parents").
- It applies in addition to the school's terms and conditions, and any other information the school may provide about a particular use of personal data, including e.g. the school's policy on taking, storing and using images of children.
- Anyone who works for, or acts on behalf of, the school (including staff, volunteers, governors and service providers) should also be aware of and comply with the school's data protection policy for staff, which also provides further information about how personal data about those individuals will be used.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

The school may process a wide range of personal data about individuals including current, past and prospective pupils and their parents as part of its operation, including by way of example:

- Names, addresses, telephone numbers, e-mail addresses and other contact details;
- Bank details and other financial information, e.g. staff payroll;
- Past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs);
- Where appropriate, information about individuals' health, and contact details for their next of kin;
- References given or received by the school about pupils, and information provided by previous educational establishments and/or other professionals or organisations working with pupils; and
- Images of pupils (and occasionally other individuals) engaging in school activities, and images captured by the school's CCTV system (in accordance with the school's policy on taking, storing and using images of children);

- Generally, the school receives personal data from the individual directly (or, in the case of pupils, from parents). However, in some cases personal data may be supplied by third parties (for example another school, or other professionals or authorities)

WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to staff, pupils and parents, The School may process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of its daily operation.

Some of this activity The School will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with its staff, or parents of its pupils.

Other uses of personal data will be made in accordance with The School's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involve special or sensitive types of data.

USE OF PERSONAL DATA BY THE SCHOOL

The school will use (and where appropriate share with third parties) personal data about individuals for a number of purposes as part of its operations, including as follows:

- For the purposes of pupil selection and to confirm the identity of prospective pupils and their parents;
- To provide education services, (including SEN), including musical education, physical training or spiritual development, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Maintaining relationships with alumni and The School community;
- For the purposes of management planning and forecasting, research and statistical analysis, and to enable the relevant authorities to monitor the school's performance;
- To give and receive information and references about past, current and prospective pupils, including/relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend;
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the school;
- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so, for example for medical advice, insurance purposes or to organisers of school trips;
- To monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's IT: acceptable use policy;
- To make use of photographic images of pupils in school publications, on the school website and (where appropriate) on the school's social media channels in accordance with the school's policy on taking, storing and using images of children;
- For security purposes, including CCTV and for regulatory and legal purposes (for example child protection and health and safety) and to comply with its legal obligations; and

- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

In addition, The School may need to process special category personal data (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks on staff) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons may include:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so: for example for medical advice, social services, insurance purposes or to organisers of school trips;
- To provide educational services in the context of any special educational needs of a pupil;
- In connection with employment of its staff, for example DBS checks, welfare or pension plans;
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

The school will use the contact details of parents, alumni and other members of the school community to keep them updated about the activities of the school, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the school may also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the school community, such as the Schools PTA
- Contact parents and/or alumni (including via the organisation above) by post and email in order to promote and raise funds for the school and, where appropriate, other worthy causes
- Collect information from publicly available sources about parents' and former pupils' occupation and activities, in order to maximise the school's fundraising potential

Should you wish to limit or object to any such use, or would like further information about them, please contact the Privacy Officer in writing.

RIGHTS OF ACCESS TO PERSONAL DATA ("SUBJECT ACCESS REQUEST")

- Individuals have the right under the Act to access to personal data about them held by the school, subject to certain exemptions and limitations set out in the Act. Any individual wishing to access their personal data should put their request in writing to the Privacy Officer.
- The school will endeavour to respond to any such written requests (known as "subject access requests") as soon as is reasonably practicable and in any event within statutory time limits. The school may charge an administration fee of up to £10 for providing this information.
- You should be aware that certain data is exempt from the right of access under the Act. This may include information which identifies other individuals, or information which is subject to legal professional privilege. The school is also not required to disclose any pupil examination scripts (though examiners' comments may fall to be disclosed), nor any reference given by the school for the purposes of the education, training or employment of any individual.

- A person with parental responsibility will generally be expected to make a subject access request on behalf of younger pupils. A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

EXEMPTIONS

Certain data is exempted from the provisions of the Act, including the following:

- The prevention or detection of crime
- The assessment of any tax or duty
- Where the processing is necessary to exercise a right or obligation conferred or imposed by law upon the School
- Information which might cause serious harm to the physical or mental health of the pupil or another individual
- Cases where the disclosure would reveal a child is at risk of abuse
- Information contained in adoption and parental order records
- Information given to a court in proceedings under the Magistrates' Courts (Children and Young Persons) Rules 1992

WHOSE RIGHTS

- The rights under the Act belong to the individual to whom the data relates. However, the school will in most cases rely on parental consent to process personal data relating to pupils (if consent is required under the Act) unless, given the nature of the processing in question, and the pupil's age and understanding, it is more appropriate to rely on the pupil's consent. Parents should be aware that in such situations they may not be consulted.
- In general, the school will assume that pupils consent to disclosure of their personal data to their parents, e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare, unless, in the school's opinion, there is a good reason to do otherwise.
- However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the school will maintain confidentiality unless, in the school's opinion, there is a good reason to do otherwise; for example where the school believes disclosure will be in the best interests of the pupil or other pupils.
- Pupils are required to respect the personal data and privacy of others, and to comply with the school's Online Safety policy and the school rules and code of conduct. Our pupils are young so probably don't use social media?!? We
- The provision of essential information identified in the School's Terms and Conditions forms a part of the contractual relationship between parents and the school. If subsequent to providing consent a parent/guardian does not provide the information identified in the Parental Contract/terms and Conditions a parent/guardian may be considered in breach of the terms of the contract with the school.

DATA ACCURACY AND SECURITY

- The school will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the Privacy Officer of any changes to information held about them.
- An individual has the right to request that inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under the Act) and may do so by contacting the Privacy Officer in writing.
- The school will take appropriate technical and organisational steps to ensure the security of personal data about individuals. All staff will be made aware of this policy and their duties under the Act.
- The school will not transfer data held on the school systems to third countries other than those in the EU. All data held by the school on individuals and hosted by the school will be stored on systems in the UK or the EU.
- The school will retain pupil records as required by statutory authorities. At the end of this period the school will seek the consent of the data subject/ individual to retain and use any records held beyond this date. The school will also comply with any requirement under the Charities Act, Companies Acts or Taxation Laws to retain financial records which may include parental details including contractual details..

QUERIES AND COMPLAINTS

- Any comments or queries on this policy should be directed to the Privacy Officer using the following contact details:
*The Avenue Nursery and Pre Preparatory School, 2 Highgate Avenue, London N6 5RX -
gabrielf@avenuepreprep.co.uk*
- If an individual believes that the school has not complied with this policy or acted otherwise than in accordance with the Act, they should utilise the school complaints procedure and should also notify the Privacy Officer.
- An individual may also raise a complaint about the school and its handling of personal data directly with the office of the information commissioner (ICO) ico.org.uk

Reviewed 28 March 2019

By Gabriel Fysh

Reviewed annually

