



The Abbey

The independent school for girls aged 3-18.

How We Use Your Daughter's Information Privacy Notice for Younger Pupils: for Girls aged under 16 years

Independent Day School for Girls

The Abbey, Reading

September 2018

Summary Pupil Privacy Notice for Younger Pupils (for Girls aged under 16 years)

Key Information

This notice contains the key information about how and why we collect your daughter's personal information and what we do with that information. Personal information is information that identifies your daughter as an individual and relates to your daughter. For example, information about how well your daughter is doing at School and any information that we need to take care of your daughter. Photographs and videos of your daughter also count as her personal information. We encourage you to read the full version of our pupil privacy notice which is published on the School's website and can be found at - <https://www.theabbey.co.uk/parentprivacy>

You can also obtain a copy of the full privacy notice by contacting the School on externalrelations@theabbey.co.uk

The full version includes additional points, such as:

- the rights your daughter has in her information including what decisions you can make about your daughter's information;
- for how long the School retains your daughter's personal information; and
- our legal bases for using your daughter's personal information.

Our primary reason for using your daughter's personal information is to provide her with an education.

We set out below examples of the different ways in which we use your daughter's personal information and where that personal information comes from.

- Admissions forms give us lots of personal information about your daughter. We get information from you, your daughter's teachers and other pupils. Your daughter's old school also gives us information about your daughter so that we can teach and care for your daughter.
- Sometimes we get information from your daughter's doctors and other professionals where we need this to look after your daughter.
- We may need to report some of your daughter's information to the government (e.g. the Department for Education). For example, we may need to tell the local authority that your daughter attends the School, if she leaves the School or let them know if we have any concerns about your daughter's welfare.
- We may use photographs or videos of your daughter for the School's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the School. We may continue to use these photographs and videos after your daughter has left the School.
- Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.
- We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing.
- We use CCTV to make sure the School site is safe and secure. CCTV is not used in private areas such as changing rooms.

- We will keep details of your daughters address when you leave the School so we can send her our alumnae newsletters/publications and find out how she is getting on. We will retain this information in the School's CRM alumnae database. Further information on the alumnae association can be found at - <http://theabbey.co.uk/community/alumnae>
- We will send your daughter information to keep her up to date with what is happening at the School. For example, by sending her information about events and activities taking place (including fundraising events) and the School newsletter.
- We are legally required to provide the Department for Education with certain information about you daughter. Some of this information will be stored on Government sites, such as the National Pupil Database. Organisations can request information from the National Pupil Database which might include information about your daughter. But they are only allowed to do this for limited purposes and they must be very careful about how they use your information. More information can be found here - <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

You have the following rights regarding your daughter's information:

- Rectification of information held;
- Access to information held;
- Deletion of information in certain circumstances;
- Portability - the transfer of information to you or a third party;
- Restriction of use of information; and
- The right to object to the use of information in certain circumstances.

These rights are explained in more detail in the full privacy notice, and the Data Protection Officer can give you more information. If you have any questions about how we use your personal information, please speak to your daughter's form tutor.

The Data Protection Officer (DPO) is the person responsible at our school for managing how we look after personal information and can answer any questions which you may have about how we use your daughter's personal information. The Head of Finance and Resources is responsible for strategic oversight of the Data Protection policies and actions.

Contacts

- The School Data Protection Officer can be contacted on dpo@theabbey.co.uk
- The Head of Finance and Resources can be contacted on finance@theabbey.co.uk

Consent for all Girls under the age of 16 years

Parents should be aware that, from around the age of 12 and upwards, the law recognises pupils' own rights to have a say in how their personal information is used - including their images. Consent at The Abbey is sought from the parents of all girls below 16 years of age; and for girls 16 and over from the pupils themselves. The Abbey encourages all parents to share these consent decisions with their daughters.

Pupil Privacy Notice for Younger Pupils (for Girls aged under 16 years)

Introduction

This notice is to help you understand **how** and **why** we collect your daughter's personal information and **what** we do with that information. It also explains the decisions that you can make about your daughter's information.

We are giving you this notice because you are able to exercise your daughter's data protection rights on her behalf. When your daughter is older (usually when they reach the age of 16) she will be considered mature enough to exercise her own data protection rights.

If you have any questions about this notice please talk to The Head of Finance and Resources.

What is "personal information"?

Personal information is information that the School holds about your daughter and which identifies your daughter.

This includes information such as her date of birth and address as well as things like exam results, medical details and behaviour records. The School will also hold information such as her religion or ethnic group as it is a legal requirement to report these statistics to the Department for Education. CCTV, photos and video recordings of your daughter are also personal information.

Our legal bases for using your child's information

This section contains information about the legal basis that we are relying on when handling your daughter's information.

The two tables below contain a general description of the different legal bases but we have also used a letter code system so that you can see which bases we are relying on for each of the purposes described at paragraphs 1 to 36 below.

Legitimate interests - LI

This means that the School is using your daughter's information when this is necessary for the School's legitimate interests or someone else's legitimate interests. We won't rely on this basis when your daughter's interests and fundamental rights override our legitimate interests. Specifically, the School has a legitimate interest in:

- Providing your daughter (and other children) with an education and making sure that your daughter is behaving properly.
- Complying with our agreement with you for your daughter to be at the School.
- Keeping the school buildings safe.
- Making sure that the School is well managed and that we protect the School's reputation.
- Safeguarding and promoting your daughter's welfare and the welfare of other children.
- Promoting the objects and interests of the School. This includes fundraising e.g. if we want to raise money to build new buildings and using photographs of your daughter in promotional material such as on our website and in the prospectus.
- Ensuring that all relevant legal obligations of the School are complied with (for example in relation to inspections).

- Using your daughter's information in connection with legal disputes.
- Facilitating the efficient operation of the School.

In addition your daughter's personal information may be processed for the legitimate interests of others. For example, we may use information about your daughter when investigating a complaint made by another pupil.

Legal obligation - LO

Where the School needs to use your daughter's information in order to comply with a legal obligation, for example to report a concern about your wellbeing to Children's Services. We will also have to disclose your daughter's information 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 daughter's information to protect your daughter's vital interests or the vital interests of someone else (e.g. if your daughter or they are seriously hurt).

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

This applies where what we are doing is for the benefit of people generally. The following are examples of where this applies:

- providing your daughter and others with an education;
- safeguarding and promoting your daughter'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 information. These special categories include: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information, and information about sex life or orientation.

Substantial public interest - SPI

The School is allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This is similar to "public interest" in the table above. For example the School will use information about your daughter's health to look after her. We may also use other types of special category personal data about your daughter to provide her with an education, to look after your daughter and her classmates or when the School is inspected.

Employment and social protection and social security law- ESP

There will be times when the School needs to use your daughter's information because we are an employer. Also the School will use your daughter's information to comply with social protection law (e.g. to look after your daughter) and social security laws. Social protection law is concerned with preventing, managing, and overcoming situations that adversely affect people's wellbeing.

Vital interests - VI

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

Legal claims - LC

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. This applies whenever sharing special category data is necessary in relation to legal claims.

Medical purposes - MP

This includes medical treatment and the management of healthcare services.

How and why does the School collect and use your daughter's personal information?

We set out below different ways in which we use personal information and where this personal information comes from. The letter codes refer to the legal bases we are relying on. Please see the section above for an explanation.

1. Our primary reason for using your daughter's information is to provide your daughter with an education - LI, PI, SPI.
2. The School will also use your daughter's personal information to safeguard and promote your daughter's welfare and the welfare of others (for example, so that we can look after your daughter if they are hurt) - LI, PI, SPI, ESP, MP.

The admissions forms which you complete give us personal information about your daughter. We get information from your daughter, her teachers and other pupils. Your daughter's old school also gives us information about how well your daughter did and any difficulties they had if we need this information to teach and care for her.

Sometimes we get information from your daughter's doctor and other professionals where we need this to look after your daughter.

3. We will use information about your daughter during the admissions process e.g. when assessing entrance exams and considering any information provided on the registration form. We may let your daughter's previous school know if they have been offered a place at the School - LI, PI, SPI.
4. We need to tell all appropriate members of staff if your daughter has a health issue - LI, PI, SPI.
5. We will tell your daughter's teachers if he or she has special educational needs or requires extra help with some tasks - LI, PI, SPI.
6. We will need to share information about your daughter (e.g. about her health and wellbeing) with the School Nurse - LI, PI, SPI, ESP, MP.
7. If we have information that your daughter suffers from an allergy we will use this information so that we can look after your daughter - LI, PI, SPI, VI, MP.
8. If we have information that your daughter suffers from a disability we will use information about that disability to provide support - LI, PI, SPI, ESP, MP.
9. Where appropriate, the School will have information about your daughter's religious beliefs and practices. For example, to prepare our submission to the Independent Schools Council

(ISC) annual census. However, it is not possible to identify your daughter from the information which we provide to the ISC - LI, PI, SPI.

10. We use CCTV to make sure the School site is safe. CCTV is not used in private areas such as changing rooms - LI, PI, SPI.
11. We record your daughter's attendance and if he or she has time away from the School we record the reason(s) why - LI, PI, SPI.
12. We will need to report some of your daughter's information to the government (e.g. the Department for Education). We will need to tell the local authority that your daughter attends the School, if your daughter leaves the School or let them know if we have any concerns about your daughter's welfare - LI, LO, PI, SPI, ESP.
13. We may need to share information about your daughter with the Health and Safety Executive (a government organisation) if there is a health and safety issue at the School - LI, LO, SPI.
14. The School is a charity which means that in exceptional circumstances we may need to share your daughter's information with the Charity Commission e.g. in the event of a serious incident - LI, LO, PI, SPI.
15. When we are inspected by the Independent Schools Inspectorate we will have to make your daughter's information available to the inspectors to assist them with their inspection - LI, LO, PI, SPI.
16. If the School receives a complaint or grievance which involves your daughter we will need to use her information to deal with this appropriately. For example, if you make a complaint or if another parent complains about an issue which involves your daughter - LI, PI, SPI.
17. The School may share information about your daughter with the local authority for the purpose of the preparation, implementation and / or review of your child's Statement of Special Educational Needs or Education Health and Care Plan - LI, PI, LO.
18. We are legally required to provide the Department for Education with certain information about your daughter. Some of this information will be stored on Government sites, such as, the National Pupil Database. Organisations can request information from the National Pupil Database which includes information about your daughter. But they are only allowed to do this for limited purposes and they must be very careful about how they use your daughter's information. More information can be found here - <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information> - LO, SPI.
19. We will need information about any court orders or criminal petitions which relate to your daughter. This is so that we can safeguard your daughter's welfare and wellbeing and the other pupils at the School - LI, PI, SPI.
20. If your daughter is from another country (not a British national) we have to make sure that they have the right to study in the UK. Sometimes the government will ask us to provide information as part of our reporting requirements. In addition to this we have a duty to provide information about your child to UK Visas and Immigration - LI, LO, PI, SPI.

21. Depending on where your daughter will go when she leaves us we will provide her information to other schools and colleges. For example, we will share information about your daughter's exam results and provide references - LI, PI, SPI.
22. If your daughter has a safeguarding file, we are legally required to pass this file to her next school - LI, LO, PI, SPI, ESP.
23. If your daughter takes public examinations we will need to share information about her with examination boards. For example, if your daughter requires extra time in exams - LI, PI, SPI.
24. We may need to share information with the police or our legal advisers if something goes wrong or to help with an enquiry. For example, if one of your daughter's classmates is injured at School or if there is a burglary - LI, LO, PI, SPI, LC.
25. We use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We will share your daughter's information with them if this is relevant to their work - LI, PI, SPI.
26. If your daughter has misbehaved in a serious way, we may need to share information with the police and we may need to use information about the action taken by the police - LI, LO, PI, SPI, ESP.
27. We may share some information with our insurance company to make sure that we have the appropriate and necessary insurance cover that we need - LI, PI, SPI, LC.
28. If you have appointed an agent to act on your behalf during the admissions process, then we may share information about your daughter with them. For example, we may send them the acceptance letter so that they can pass this on to you- LI.
29. We will share your daughter's academic and (where fair) her behaviour records with you or her education guardian so you can support her schooling - LI, PI, SPI.
30. We will monitor your daughter's use of email, the internet and mobile electronic devices e.g. iPads. This is to check that your daughter is not misbehaving when using this technology or putting herself at risk of harm. If you would like more information about this you can read the acceptable use of IT and email policy or speak to your daughter's form teacher - LI, PI, SPI.
31. We may use photographs or videos of your daughter for the School's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the School. We will continue to use these photographs and videos after your daughter has left the School - LI, PI.
32. Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson - LI.

If you have any concerns about us using photographs or videos of your daughter please speak to your daughter's form tutor.

33. We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing - LI.
34. We will keep details of your address when your daughter leaves the School so we can send her our alumnae newsletters/publications and find out how your daughter is getting on. We

will retain this information in the School's CRM alumnae database. Further information on the alumnae association can be found at - <http://theabbey.co.uk/community/alumnae> - LI

35. The School must make sure that our computer network is working well and is secure. This may involve information about your daughter, for example, our anti-virus software might scan files containing information about your daughter - LI.

36. We can keep information about your daughter for a very long time or even indefinitely if this is for archiving which is in the public interest. For example, old class photographs - LI.

We will only share your daughter's information with other people and organisations when we have a good reason to do so. In exceptional circumstances we may need to share it more widely than we would normally.

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

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

If you have any questions about the above, please speak to your daughter's form tutor.

Criminal offence information

In exceptional circumstances, we may use information about criminal convictions or offences. We will only do this where the law allows us to. This will usually be where such processing is necessary to carry out our obligations, to exercise our rights or to look after our pupils.

More than one basis

As you will see from the information above, in some cases we will rely on more than one basis for a particular use of your daughter's information. 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 on "legal obligation" to share personal information 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 daughter's information in certain ways as an alternative to relying on any of the bases in the points 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. If we ask for your consent to use your daughter's personal information you can take back this consent at any time.

Any use of your daughter's information before you withdraw your consent remains valid. Please speak to your daughter's form teacher if you would like to withdraw any consent given.

Sending information to other countries

We may send your daughter's information to countries which do not have the same level of protection for personal information as there is in the UK. For example, we may store your daughter's information 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

If the country that we are sending your daughter's 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.

We will provide you with details about the safeguards which we have in place outside of this privacy notice. For example, if we are using data protection clauses in our contract with the organisation to whom we are sending her information. If you have any questions about the safeguards that are in place please contact the Data Protection Officer (DPO).

For how long do we keep your information?

We keep your daughter's information for as long as we need to in order to educate and look after you. We will keep some information after your daughter 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 daughter's 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 your daughter for a very long time or even indefinitely if this is for archiving which is in the public interest.

Please see our Information and Records Retention List for more detailed information. This can be found on our website here.

What decisions can you make about your information?

You are able to make various decisions about your daughter's information on her behalf. Your daughter's rights are as follows:

- **Rectification:** if information the School holds about you daughter is incorrect you can ask us to correct it.
- **Access:** you can also ask what information we hold about your daughter 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 information about your daughter, where it came from and what types of people we have sent it to.
- **Deletion:** you can ask us to delete the information that we hold about your daughter in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your daughter's information to you or to a third party in a format that can be read by computer in certain circumstances.
- **Restriction:** our use of information about your daughter may be restricted to simply storing it 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.
- **Object:** you may object to us using your daughter's information where:

- we are using it for direct marketing purposes (e.g. to send you daughter the School magazine);
- 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 information" above;
- we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of your daughter's class for historical reasons.

Your daughter's form teacher or the DPO can give you more information about your daughter's data protection rights.

Further information and guidance

This notice is to explain how we look after your daughter's personal information. Your daughter's form teacher or the DPO can answer any questions which you might have.

Please speak to your daughter's form teacher if:

- you would like to exercise any of your daughter's rights listed above; or
- you would like us to update the information we hold about your daughter; or
- you would prefer that certain information is kept confidential.

If you have any questions about how we use your daughter's personal information, please speak to the Data Protection Officer or your daughter's form tutor.

The Data Protection Officer (DPO) is the person responsible at our school for managing how we look after personal information and can answer any questions which you may have about how we use your daughter's personal information. The Head of Finance and Resources is responsible for strategic oversight of the Data Protection policies and Data Protection compliance actions.

Contacts

- The School Data Protection Officer can be contacted on dpo@theabbey.co.uk
- The Head of Finance and Resources can be contacted on finance@theabbey.co.uk

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

Consent for all Girls under the age of 16 years

Parents should be aware that, from around the age of 12 and upwards, the law recognises pupils' own rights to have a say in how their personal information is used - including their images. Consent at The Abbey is sought from the parents of all girls below 16 years of age; and for girls 16 and over from the pupils themselves. The Abbey encourages all parents to share these consent decisions with their daughters.