



Current Parent and Pupil - Privacy Notice

Background

This privacy notice is also sent to parents alongside the Parent Terms and Conditions ("Parent Contract"), signed on acceptance to a Cothill Trust School.

For the purposes of Data Protection Law (the UK Data Protection Bill and the General Data Protection Regulation) the School is the Data Controller of Personal Data about pupils and their parents and/or guardians (the School's Information Commissioner's registration details are listed in section 1 of the School's Data Protection Policy, published on the Cothill Trust website). In the main (unless otherwise specified below), the School's basis for processing your and your child's personal data is as a result of either a contractual obligation under the Parent Contract or as a result of legitimate interest - in other words, the School requires this information in order to carry out its ordinary duties.

Personal Data processed by us includes:

- names, dates of birth, nationality and contact details;
- where appropriate, medical / health information; - assessment information;
- attendance records; - information relating to special educational needs or disabilities;
- previous school(s) information, including references and assessment data;
- images of pupils;
- in relation to parents and/or guardians - financial information

Some of this data is classified as Special Category Personal Data (sometimes called 'sensitive personal data' as defined in the School's Data Protection policy) such as information about parents' and / or pupils' ethnic group, religious beliefs and relevant medical information. The legal basis for processing this information is usually in order to adequately safeguard the interests your child but this information may also be processed in order to protect their vital interests or as a result of a legal obligation.

We acquire Personal Data in a number of ways. For example, parents of pupils may provide us with

Personal Data about themselves or their family in correspondence, forms, documents, during discussions with staff, and through our website. Every form completed by a parent or child containing personal data will be held in accordance with the School's Data Protection Policy.

Data Check Form

Each academic year, a data check form is sent to parents and pupils (either electronically or in hard copy) that asks for personal data to be checked and data preferences to be updated. It is vitally important that this is completed by parents and pupils to ensure that the School maintains accurate records.

How we use your Personal Data

We commonly use Personal Data for:

- Ensuring that we provide a safe and secure environment;
- Making decisions relating to admissions, bursaries and scholarships;
- Providing pastoral care;
- Providing education and learning for children (see additional note * below regarding online learning)
- Enabling pupils to take part in exams and assessments and to monitor and report on pupils' progress and educational needs;
- Providing additional activities for children and parents, such as extra-curricular clubs and educational trips and visits;
- Protecting and promoting our interests and objectives, including fundraising;
- Safeguarding and promoting the welfare of children;
- Where there has been a suspected misuse of the School's ICT facilities;
- Legal and management purposes and fulfilling our contractual and other legal obligations

** In March 2020, our schools had to physically close due to the Covid-19 pandemic and continue learning online. This was via google meet with a mixture of live and recorded lessons. Online learning continues to be offered for pupils who have been unable to return to our schools once opened (e.g international pupils) and those who may be shielding or self isolating. Our lawful basis to use personal data for this purpose is a contractual obligation to provide education for our pupils. Pupils are only able to access recordings or live lessons if they are from that class. Google security information can be found [here](#).*

We may share Personal Data with third parties where doing so complies with Data Protection Law. For example, we may share personal data:

- With relevant statutory agencies or authorities (e.g. for safeguarding reasons or in order to comply with our reporting obligations);
- Where necessary in connection with learning and extracurricular activities and trips undertaken by pupils;

- When a reference or other information about a pupil or ex-pupil is requested by another educational establishment or employer to whom they have applied;
 - To enable pupils to take part in national and other assessments;
 - To obtain professional advice and insurance for the School;
- and/or
- Where otherwise required by law or where reasonably necessary for the operation of the School.
- We may share information about a pupil with their parents where permitted by data protection law, e.g. information about the pupil's academic attainment, behaviour and progress.
- We may need to share special category data (medical for instance), in order to safeguard students' vital interests and welfare, to provide appropriate pastoral 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 vital interests to do so: for example for emergency medical advice or treatment, to insurance providers or to schools or individual host families caring for our pupils.
- When using the school's medical facilities, we will routinely share details of any physical injury and medication administered with a pupil's parents. Where a pupil contacts the medical centre for other issues, they will normally be asked for consent to share that information with their parents (however, in the case of any potential safeguarding concern, the pupil will not be promised confidentiality).

Biometric Information, Photographs & CCTV We do not currently use biometric data (eg. fingerprint identification systems) for school administration purposes (access to buildings, cashless purchasing etc).

We use CCTV recordings for the purposes of crime prevention and investigation and also in connection with our obligation to safeguard the welfare of pupils, staff and visitors to our site. CCTV recordings may be disclosed to third parties such as the police but only where such disclosure is in accordance with data protection law. Staff and pupils are also reminded that although the primary purpose of the School's CCTV system is the detection and prevention of crime, any evidence of misconduct captured incidentally on these cameras can be used as evidence in disciplinary matters. There will be no routine monitoring of data captured by CCTV for disciplinary purposes but in the event of an incident or allegation in relation to a visitor, pupil or member of staff, any existing footage may be reviewed if relevant to the allegations. We may use photographs (and occasionally other media such as video or sound recordings) of pupils for educational purposes or in our publications, including on the school website and on social media, for marketing and promotion purposes. We may also share photographs and other media with third parties for these purposes (for example, for publication in a local or national newspaper). Consent will be sought for the use of photos in line with the Taking and Storing Images of Children Policy (available on the School website).

Fees

We may make enquiries of pupils' previous schools for confirmation that all sums due and owing to such schools have been paid. We may also inform other schools or educational establishments to which pupils are to be transferred if any of our fees are unpaid.

Data Retention

Personal data will be stored securely and not be kept for any longer than required for the School's legitimate or lawful purposes. Some records have to be retained for minimum periods by law. As a general rule, when personal data is no longer needed for the purposes for which it was collected, your data will be securely and permanently destroyed as soon as practicable. The Schools of the Cothill Trust maintains a school archive of historical interest. This means that some data that is used for research purposes (and that is compatible with the purposes for which the data was originally collected) may be kept indefinitely if the relevant conditions apply.

For more information on an individual School's data retention policy or on how long it stores certain types of personal data, please contact the School's Data Compliance Lead or the Trust's Data Compliance Lead (datacompliance@cothilltrust.org).

Alumni

We may share your contact details and information about your interests with the Alumni so that they can inform you about events and activities which may be of interest. The Alumni may organise reunions, sporting fixtures, dinners, etc. The Cothill Trust Schools' Alumni have their own Privacy Notice that explains more fully how it uses alumni and parent data.

Last Review: December 2020