

**PRIVACY NOTICE: PARENTS**  
**September 2023**



**Introduction**

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This summary is to help you understand how and why Windlesham House School (“the School”) collects personal information and what the School does with that information when you accept a place at Windlesham House School for your child. If you have any questions about this notice, please contact the Admissions Department: [admissions@windlesham.com](mailto:admissions@windlesham.com)

This summary is intended to provide information about how the School will use (or "process") personal information about pupils and the pupils parents, carers or guardians ("parents"). This information is provided in accordance with the rights of individuals under Data Protection Law to understand how your personal information is used. The School has also produced a pupil-friendly summary document of the privacy notice for pupils to read – available on request.

This summary applies when collecting information via the School’s online enquiry form on the website, via email, telephone enquiries and/or any paper form. Anyone who works for, or acts on behalf of, the School (including staff, volunteers, governing body members and service providers) are made aware of and should comply with the School’s Privacy Notice and its data protection procedures.

**Privacy Officer (PO)**

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The designated Privacy Officer at Windlesham House School (“the School”) is the Bursar. The Privacy Officer is responsible for all issues relating to Data Protection and any queries should be directed to her.

**How the School uses pupil information**

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The School collects and holds personal information relating to its pupils directly from their parent(s)/guardian(s) at the time of registration and joining the School and may also receive information about them from their previous School, local authority and/or the Department for Education (DfE). The School also creates personal information about the pupil during their time in the School in the form of assessments, marking of work and reports. The School uses this personal data:

- For the purposes of pupil assessment and to confirm the identity of prospective pupils and their parents;
- To provide education services (including SEN), career services, and co-curricular activities to pupils; monitoring pupils' progress and educational needs; and 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 Acceptable Use of ICT and Online Safety Policy;

- To make use of photographic images of pupils for identification purposes and in School publications, on the School website and (where appropriate) on the School's social media channels, where parental permission has been given, and in accordance with the School's use of images and videos procedure
- For security purposes, 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.

This information will include their contact details, assessment results, attendance information, any exclusion information, where they go after they leave the School and personal characteristics such as their ethnic group, any special educational needs they may have as well as relevant medical information.

The School collects photographic images of its pupils which the School uses for purposes of identification and also for marketing purposes. Upon accepting an offer of a place at the School for your child, you will have been offered an opportunity to consent or otherwise to the use of your child's photographic image for marketing purposes. The School will not use images of pupils for marketing purposes where parental consent has not been explicitly given.

Consent for the sharing of your data in this way may be given or withdrawn by you at any time during your child's attendance at the School. If you wish to change your consent please contact the Bursar on [eharris@windlesham.com](mailto:eharris@windlesham.com)

Images of parents, pupils and other visitors to the School will be captured by our CCTV system which monitors public areas. These images are collected and stored in line with the School's CCTV Procedure and Data Protection Policy. The images do not leave School premises and are never shared with any third party, with the potential exception of law enforcement agencies in the event of a security breach. Images will be stored for 90 days unless there is a specific purpose for which they are retained for a longer period.

The School will not give information about its pupils to anyone without your consent unless the law and our policies allow us to do so. If you want to receive a copy of the information about your child that the School holds, please contact the Privacy Officer.

If your child moves to another School, the School will share transfer reports about your child with their next School which may also include exam results.

When a child leaves the School, our records for that child will be archived for 25 years from the child's DOB, or 35 years in the case of SEN information. If any safeguarding information has been recorded about a child, we are required to archive those records for the lifetime of that child.

The School is required, by law, to pass certain information about our pupils to our local authority (LA) and the Department for Education (DfE).

DfE may also share pupil level personal data that the School supplies to them, with third parties. This will only take place where legislation allows it to do so and it is in compliance with the Data Protection Act 2018.

Decisions on whether DfE releases this personal data to third parties are subject to a robust approval process and are based on a detailed assessment of who is requesting the data, the purpose for which it is required, the level and sensitivity of data requested and the arrangements in place to store and handle the data. To be granted access to pupil level data, requestors must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and retention and use of the data.

For more information on how this sharing process works, please visit <https://www.gov.uk/guidance/national-pupil-database-apply-for-a-data-extract>

For information on which third party organisations (and for which project) pupil level data has been provided, please visit <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

If you need more information about how the DfE collect and use your information, please visit the DfE website at <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

When your child leaves the School, your child (if she has reached the age of 13) will be offered the opportunity to be included in our Alumni programme. A separate Privacy Notice regarding the processing of your data for Alumni purposes will be provided to you at that time.

If you would like to see a copy of the information about your child that the School holds, please contact the Privacy Officer.

### **How the School uses parent information**

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The School collects and process personal data relating to the parents of pupils at the School. This is for contractual purposes, to enable the payment of fees and for general day to day communication about your child and what is taking place at the school.

This personal data includes identifiers such as names, addresses, email addresses and telephone numbers, characteristics such as ethnic group, and banking details.

Upon accepting an offer of a place at the School for your child, you will have been offered an opportunity to consent or otherwise to the School sharing your contact information on a Whatsapp group with other parents in your child's cohort. The purpose of this sharing of information is to facilitate the wider School community. You will also have been offered an opportunity to consent or otherwise to the School sharing your contact information with our Fundraising team. The purpose of this sharing of information is also to facilitate the wider School community, including the promotion of fundraising efforts. The School will not share your contact information with either your child's cohort nor the Fundraising team unless explicit consent has been given.

Consent for the sharing of your data in this way may be given or withdrawn by you at any time during your child's attendance at the School. If you wish to change your consent please contact the Bursar on [eharris@windlesham.com](mailto:eharris@windlesham.com)

The School will not share information about you with third parties without your consent unless the law allows us to. The School is required, by law, to pass on some of this personal data to:

- the local authority (LE)
- the Department for Education (DfE)

### **Further information and guidance**

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If you require more information about how the local authority and/or DfE store and use your personal data please visit <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

If you would like to see a copy of the information about you that the School holds, please contact the Bursar on [eharris@windlesham.com](mailto:eharris@windlesham.com)

When your child leaves the School, your data will be archived under the retention rules for pupil files, with the exception of your financial information which will be kept for 6 years from the end of the year in which your child left the School, under HMRC requirements.

### **Complaints**

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If you have any complaint about the way that your data is handled please refer to the School's Complaints Policy. If after following the complaints process you think we have not dealt with your request for information properly, you can complain to the Information Commissioners Office.

## Related Policies

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- CCTV Procedure
- Complaints Policy
- Data Protection Policy
- Retention of Documents Procedure