



Introduction

This School Privacy Notice (referred to as Parent Privacy Notice in our Terms and Conditions) is intended to explain how we collect, use and hold ("process") personal data about current and past pupils and parents. It is also relevant to other members of the School community. There is a specific policy for staff and users of our Holiday Activities service. It also explains your rights in relation to the personal data we hold. Pupils are encouraged to read the Pupil Privacy Policy.

The School is committed to being transparent about how it collects and uses data and to meeting its data protection obligations.

The School is a data controller of your personal information, if you have any queries please contact our Administrative Principal at privacy@clairescourt.net or 1 College Avenue Maidenhead, Berks, SL6 6AW.

Who this document applies to

All current pupils and their parents who accept a place or are on roll at the School. Other members of our School community such as PTA trustees, visitors and suppliers.

About this document

This School Privacy Notice explains how we process your personal data. It applies in addition to the School's other relevant terms and conditions and policies, including:

- Any contract between the School and parents of pupils
- The School's CCTV Policy
- Biometric Policy
- The School's Taking, Storing and Using Images Policy
- The School's Retention of Records Policy
- The School's Data Protection Policy
- The School's Safeguarding, pastoral, health and safety policies
- IT policies

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 this Privacy Notice.

How we collect your information

Information is collected in a variety of ways. For example, this can be by new pupil information forms and other school forms, general communication such as emails, discussions with staff, interviews or other types of assessment. Most of the data we process comes directly from the individual concerned or in the case of pupils, from their parents. We may also collect personal data about pupils and parents from previous schools and other third parties.

Data check

Each year we send an electronic 'data check' reminder to parents asking that personal data is checked and consent preferences are updated. It is important that parents keep their records up to date and you can inform the School at any time of changes.

The types of personal data processed by the School

Personal data that may be collected by us includes:

- name, address and other contact details
- date of birth
- previous school/education details, school reports and references
- assessment information
- academic, disciplinary and other education related records, examination scripts and marks, attendance records
- emergency contact information (other than parents)
- information on siblings
- information relating to special educational needs or disabilities, this may include Educational Psychologist (EP) reports
- parent employment information
- bank details and other financial information
- passport details
- images of pupils - photos and videos and images captured by the School's CCTV system
- 'Special Category' data including:
 - Gender, nationality, ethnicity, religion
 - Medical /health information
 - Biometric information (fingerprint identification system)

How we use your data and the legal basis for processing it

We process personal data to support the School's operation as an independent day school for pupils aged 3 to 18 years, our primary reason for using personal data is to provide educational services to your child. Our legal basis for processing it is:

- (1) To enter or fulfill a contract with you

We need to process data to form a contract with you to deliver educational services and to perform our contractual obligations, for instance to be able to contact you if there is a concern.

- (2) Legitimate Interests

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.

The School expects that the following uses will fall within its (or its community's) "legitimate interests":

- For the purposes of pupil selection (and to confirm the identity of pupils and their parents).
- To provide education services, including musical education, physical training or spiritual development, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs.
- Maintaining relationships with alumni and the School community, including direct marketing or fundraising activity.
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law.
- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate.
- 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; and to provide references to potential employers of past pupils.
- 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 care.
- 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 our 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 biometrics and CCTV in accordance with the School's Biometrics or CCTV policies.
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process.
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School.

(3) Special Category Data

In addition, the School will on occasion need to process special category personal data (concerning health, ethnicity, religion, biometrics or sexual life) in accordance with rights or duties imposed on it by law, the reasons 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 or other relevant information where it is in the individual's vital interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be

made aware of dietary or medical needs, our coach services for pupil identification and safety.

- To provide educational services in the context of any special educational needs of a pupil.
- To provide spiritual education in the context of any religious beliefs.
- To run any of its systems that operate on biometric data (such as remote printing and cashless catering).
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are SEN, health or safeguarding elements.

(4) Legal Obligations

Some data we process about you or your child is to fulfil our legal rights, obligations and duty of care.

- For child protection, diversity monitoring and health and safety.
- To provide data for the Department for Education (DfE), the Independent Schools Inspectorate and the Independent Schools Council.

Sharing your information with others

Occasionally, the School will need to share personal information relating to its community with third parties, such as professional advisers (lawyers, insurers and accountants), government authorities (DfE, police or the local authority) and regulatory bodies such as the Independent Schools Inspectorate.

We may also need to share Personal Data in connection with learning and extracurricular trips and activities undertaken by pupils. This may include our transport providers and travel agents.

For the most part, personal data collected by the School will remain within the School, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- Medical records held and accessed only by the School Nurse and shared with appropriate staff as authorised by the School Nurse, or otherwise in accordance with express consent.
- Pastoral or safeguarding files.

A certain amount of any SEN pupil's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

Staff, pupils and parents are reminded that the School is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the

LADO or police. For further information about this, please view the School's Safeguarding Policy.

In accordance with the UK GDPR and Data Protection Act 2018, some of the School's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the School's specific directions.

How we protect your data

The School takes the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

How long is your information kept

The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the School will retain pupil information up until the pupil's 25th birthday. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements. Please ask to see the School's Record Retention Policy & Schedule for more specific information. If you have any queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact privacy@clairescourt.net.

However, please bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data even following such request.

A limited and reasonable amount of information will be kept for archiving purposes and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes.

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, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the School will 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.
- Contact parents and/or alumni by post and email in order to promote and raise funds for the School and other worthy causes related to the School.

Should you wish to limit or object to any such use, or would like further information, please contact our Administrative Principal at privacy@clairescourt.net. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the School is nonetheless likely to retain some of

your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

Your rights

- **Rights of access**

You have various rights under the UK GDPR and Data Protection Act 2018 to access and understand the personal data held about you by the School, and in some cases you can ask for it to be erased or amended or have it transferred to others, or for the School to stop processing it, subject to certain exemptions and limitations.

You can:

- access and obtain a copy of the data on request
- ask us to change incorrect or incomplete data
- ask us to delete or stop processing your data
- object to the processing of your data where Claires Court Schools is relying on its legitimate interests as the legal ground for processing
- ask the School to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the School's legitimate grounds for processing data.

If you wish to access or amend your data, please put your request in writing to the Administrative Principal at privacy@clairescourt.net or 1 College Avenue Maidenhead, Berks, SL6 6AW.

The School will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time-limits (which is one month in the case of requests for access to information).

The School will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the School may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

- **Requests that cannot be fulfilled**

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals, or information which is subject to legal privilege (for example legal advice given to or sought by the School, or documents prepared in connection with a legal action).

The School is also not required to disclose any pupil examination scripts (or other information consisting solely of pupil test answers), provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the School itself for the purposes of the education, training or employment of any individual.

You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls

within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

- **Pupil requests**

Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the School, they have sufficient maturity to understand the request they are making. A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger pupils, the law still considers the information in question to be the child's: for older pupils, the parent making the request may need to evidence their child's authority for the specific request.

Pupils from Year 9 upwards are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home.

- **Parental requests, etc.**

It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about pupils without their consent. The School may consider there are lawful grounds for sharing with or without reference to that pupil.

Parents will in general receive educational and pastoral updates about their children, in accordance with the School's terms and conditions. Where parents are separated, the School will [in most cases aim to provide the same information to each person with parental responsibility, but may need to factor in all the circumstances including the express wishes of the child.

All information requests from, on behalf of, or concerning pupils – whether made under subject access or simply as an incidental request – will therefore be considered on a case by case basis.

- **Consent**

Where the School is relying on consent, for example biometrics, as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Please be aware however that the School may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.

Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates. However, the School will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils – for example, under the parent contract, or via a form. Parents and pupils should be aware that this is not

necessarily the same as the School relying on strict consent (see section on Consent above).

Where consent is required, it may in some cases be necessary or appropriate – given the nature of the processing in question, and the pupil's age and understanding – to seek the pupil's consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances.

In general, the School will assume that pupils' consent is not required for ordinary 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. That is 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 may be under an obligation to 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, or if required by law.

Pupils are required to respect the personal data and privacy of others, and to comply with the School's Acceptable use of ICT and the School Rules and Expectations.

Contact and complaints

If you have any comments or concerns about how we process your data please contact our Administrative Principal privacy@clairescourt.net. If you are not satisfied with the outcome, or how we deal with your complaint, you can contact the Information Commissioner: www.ico.org.uk.

This notice

The School will update this School Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

Last reviewed: April 2025

Next review: April 2026

Reviewed by: PAH
