



**BEDFORD  
GIRLS  
SCHOOL**

## **How we use your daughter's information Privacy Notice for younger pupils**

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**Independent Day School for Girls**

**The Harpur Trust**

## Pupil Privacy Notice for Parents - Key Information

This notice contains the key information about how and why Bedford Girls' School, who are part of the Harpur Trust collects 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 their personal information.

We encourage you to read the full version of our pupil privacy notice which is published on the School website and can be found here [www.bedfordgirlsschool.co.uk/389/our-school/school-policies](http://www.bedfordgirlsschool.co.uk/389/our-school/school-policies). You can also obtain a copy of the full privacy notice by contacting the School at [information@bedfordgirlsschool.co.uk](mailto:information@bedfordgirlsschool.co.uk) or calling 01234 361900

The full version includes additional points, such as:

- the rights your daughter has in their 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 grounds 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.

- When you join the School your Admissions and Acceptance Forms give us lots of personal information about your daughter. Your daughter, their teachers and other pupils may also provide information once your daughter is a pupil in the School. Your daughter's old school also gives us information about your daughter so that we can teach and care for your child.
- Sometimes we get information from your daughter's doctors and other professionals where we need this to look after your child.
- We may need to report some of your daughter's information to the government. For example, we need to tell the local authority that your daughter attends one of the Harpur Trust's schools or let them know if we have any concerns about your daughter's welfare.
- We may use photographs or videos of your daughter, along with their names, for the Bedford Girls' School's website, social media sites, newsletters and publications to show current parents and prospective families what we do here, or on the Harpur Trust's website to promote the Harpur Trust. We may continue to use these photographs and videos after your daughter has left Bedford Girls' 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, social media and send articles/photographs and videos to local and national news outlets to celebrate School's achievements.
- We may keep details of your daughter's address when she leave so we can send her alumnae mailings and find out how she is getting on. Your daughter automatically becomes a member of our Alumnae association, and we will pass her details onto The Alumnae - further information on The Alumnae association can be found here [www.bedfordgirlsschool.co.uk/375/connected-community/alumnae](http://www.bedfordgirlsschool.co.uk/375/connected-community/alumnae)

The Headmistress is the person responsible at our school for managing how we look after personal information. The Headmistress can answer any questions which you may have about how we use your daughter's personal information.

## Introduction

This notice is to help parents understand **how** and **why** Bedford Girls' School collects 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 their behalf. When your daughter is older (usually when they reach the age of 12) they will be considered mature enough to exercise their own data protection rights.

If you have any questions about this notice please talk to the Headmistress.

## 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 their date of birth and address as well as things like exam results, medical details and behaviour records. The School may also record your daughter's religion or ethnic group. CCTV, photos and video recordings of your daughter are also personal information.

## How and why does the School collect and use personal information?

We set out below examples of the different ways in which we use personal information and where this personal information comes from. Our primary reason for using your daughter's information to provide your daughter with an education.

The admissions forms and acceptance forms which you complete give us personal information about your daughter. We get information from your child, their teachers and other pupils. Your daughter's old school also gives us information about your daughter if we need this to teach and care for them.

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

We collect this information to help the School run properly, safely and to let others know what we do here. Here are some examples:

- We need to tell all appropriate members of staff if your daughter is allergic to something or might need extra help with some tasks.
- We may need to share information about your daughter's health and wellbeing with the School nurses or counsellors.
- We use CCTV to make sure the school sites are safe. CCTV is not used in private areas such as changing rooms.
- We may need to report some of your daughter's information to the government. For example, we need to tell the local authority that your daughter attends one of the Trust's schools or let them know if we have any concerns about your daughter's welfare.
- We may 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 Harpur Trust's schools.
- If your daughter is from another country we have to make sure that they have the right to study in the UK. We might have to provide their information to UK Visas and Immigration.

- Depending on where your daughter will go when they leave us we may need to provide their information to other schools and colleges. For example, we may share information about your daughter's exam results and provide references. We may need to pass on information which they need to look after your child.
- If your daughter takes public examinations we will need to share information about them with examination boards. For example, if your daughter requires extra time in exams.
- We may need to share information with the police or our legal advisers if something goes wrong or to help with an inquiry. For example, if one of your daughter's classmates is injured at school or if there is a burglary.
- Occasionally we may use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly. We might need to share your daughter's information with them if this is relevant to their work.
- If your daughter have misbehaved in a serious way, and the police have become involved, we may need to use information about the action taken by the police.
- We may share some information with our insurance company to make sure that we have the insurance cover that we need.
- We may share your daughter's academic and (where fair) their behaviour records with you or their education guardians so you can support their schooling.
- We may share information about your daughter between the schools in the Harpur Trust. For example, how well your daughter has behaved at other schools in the Harpur Trust and their test results.
- 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 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 themselves 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.
- We may use photographs or videos of your daughter, along with their names, for the Bedford Girls' School's website, social media sites, newsletters and publications to show current parents and prospective families what we do here and on the Harpur Trust's website to promote the Harpur Trust. We may continue to use these photographs and videos after your daughter has left Bedford Girls' School. Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.
- If you have any concerns about us using photographs or videos of your daughter please speak to your daughter's form teacher.
- We publish our public exam results, sports fixtures and other news on the website and send articles, photographs, and videos to local and national news outlets to celebrate the School's achievements.
- We may keep details of your daughter's address when she leaves so we can send her alumnae mailings and find out how she is getting on. Your daughter automatically becomes a member of our Alumnae association so we will pass her details onto The Alumnae - further information on The Alumnae association can be found here [www.bedfordgirlsschool.co.uk/375/connected-community/alumnae](http://www.bedfordgirlsschool.co.uk/375/connected-community/alumnae)

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

- IT consultants who might access information about your daughter 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 our sites.

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

### **Our legal grounds for using your information**

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

#### Legitimate interests

This means that the processing is necessary for legitimate interests except where the processing is unfair to your daughter. The School relies on legitimate interests for most of the ways in which it uses your daughter's information.

Specifically, the School has a legitimate interest in:

- Providing your daughter with an education.
- 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.
- Facilitating the efficient operation of the School and the Harpur Trust.
- Ensuring that all relevant legal obligations of the School and the Harpur Trust are complied with.

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.

If you object to us using your daughter's information where we are relying on our legitimate interests as explained above please speak to Headmistress.

#### Legal obligation

Where the Harpur Trust 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 may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

#### Vital interests

For example, to prevent someone from being seriously harmed or killed.

#### Public interest

The School and considers that it is acting in the public interest when providing education.

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, health information, and information about sex life or orientation.

Substantial public interest

The processing is necessary for reasons of substantial public interest.

Vital interests:

To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

Legal claims:

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.

Medical purposes

This includes medical treatment and the management of healthcare services.

We may ask for your consent to use your daughter's information in certain ways. 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 the UK. For example, we may:

- store your daughter's information on cloud computer storage based overseas; or
- communicate with you about your daughter by email when you are overseas (for example, when you are on holiday).

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: [http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm)

If the country that we are sending your 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 the UK.

We will provide you with details about the safeguards which we have in place outside of this privacy notice. If you have any questions about the safeguards that are in place please contact the Headmistress.

## For how long do we keep your daughter's information?

We keep your daughter's information for as long as we need to in order to educate and look after them. We will keep certain 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 we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the School or Harpur Trust.

The table below shows for how long we keep different types of information about your daughter.

Type of information	Retention period or the criteria used to determine the retention period
Parent correspondence and financial details	Six years after pupil has left school
Bursary application	Six years after pupil has left school
Parent correspondence details (non-starters)	Five years
Pupil acceptance details (HT office)	Six years after pupil has left school
Pupil records	Date of birth + 25 years

## What decisions can you make about your daughter's information?

From May 2018 you will be able to make various decisions about your daughter's information. Some of these are new rights whilst others build on your daughter's existing rights. Your daughter's rights are as follows:

- if information is incorrect you can ask us to correct it;
- you can also ask what information we hold about your daughter and be provided with a copy. We will also give you extra information, such as why we use this information about your child, where it came from and what types of people we have sent it to;
- 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;
- you can ask us to send you, or another organisation, certain types of information about your daughter in a format that can be read by computer;
- our use of information about your daughter may be restricted 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.

The Headmistress 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. The Headmistress can answer any questions which you might have.

Please speak to The Headmistress if:

- you object to us using your daughter's information for marketing purposes e.g. to send your daughter information about school events. We will stop using your daughter's information for marketing purposes if you tell us not to; or
- you would like us to update the information we hold about your child; or
- you would prefer that certain information is kept confidential.

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](https://ico.org.uk).