



GREENBANK PREPARATORY SCHOOL & DAY NURSERY

PRIVACY & DATA PROTECTION POLICY

Member of Staff Responsible	Denise Proud / Adam Dyson
Date of Current Policy	Spring 2019
Date to be reviewed	Spring 2021

This policy is applicable to all pupils, parents, carers or guardians and staff.

ABOUT US & CONTACTING US:

Greenbank School Ltd is the 'data controller' of the information you provide to us. This term is a legal phrase used to describe the person or entity that controls the way information is used and processed. We are registered under the Data Protection Act 1998 and GDPR 2018 with the Information Commissioner's Office in the UK. Our registration number is Z7461807.

The Data Compliance Officer is the Headteacher. Day to day matters are dealt with by the SLT, Operations & Finance Managers, as appropriate.

You are welcome to get in touch with us at any time to discuss your information using the following contact details:

Headmistress

Greenbank Preparatory School, Heathbank Road, Cheadle Hulme, Cheshire, SK8 6HU

Telephone: 0161 485 3724

Email: headmistress@greenbankschool.co.uk

The School will collect and process certain information about its employees, pupils, parents, alumni and staff to allow for effective and safe running of the School. We take your privacy very seriously and we are committed to ensuring that you know exactly what information we collect about you and how we use or 'process' your information.

Please take the time to read this Privacy & Data Protection Policy as it sets out what information we collect about you, how we use it and how we keep it safe. By applying to or contracting with the School or providing information to us, you agree to its terms.

WHAT INFORMATION DO WE COLLECT AND WHEN?

We collect:

- **All information we require you to provide to us, together with any additional information you choose to provide to us.** For example, when you apply or register your child for a place at the School, we will process the information that you provide on the Application Form and Acceptance & Agreement Card and any additional information that you provide to us as part of an enquiry, complaint or feedback.
- **Academic and Pastoral Information.** We need to keep a record of the academic achievements of each of our pupils and a pastoral record to ensure that we can provide them with the best education and overall experience at the School. For example, we will keep a record of each pupil's progress reports, exam results and pastoral records.
- **E-Safety.** We also monitor the email accounts, social media content and internet use (including use of the School's devices and/or the School's internet facilities) of our pupils to ensure compliance with the School Rules or where it is appropriate for the School to do so in connection with the School's legal and/or other duties and responsibilities or other legitimate purposes or good practice requirements. In doing so, if we find anything that gives us cause for concern or evidences any breach of our School Rules or our policies and procedures, we may print and/or save a copy of such email/social media content or any such associated document for use in any disciplinary action and to be saved on the pupil's record. Staff, parents and pupils sign a Think then Click document which can be found in our Internet Usage and E-Safety policy on our website.
- **Family Information.** We need to know who to contact in an emergency or should we need to speak to you about any concerns we have with your child. Part of our role as a School is also to provide pastoral care and to do this, it is essential that we have an up to date and accurate record of each pupil's family circumstances. This may include who the pupil resides with, where the pupil lives, what a pupil's parents' occupation is, any court orders concerning the family, and any safeguarding information, including whether anyone living with the pupil has a criminal record. We will collect this information when you first apply for a place at the School. We will ask you to check and confirm that this information is still up to date annually but please notify us as soon as possible if any of this information changes.
- **Medical Information.** To ensure the safety and wellbeing of our pupils, we need to know any medical information that may affect a pupil. For example, we need to know if a pupil is taking any prescription medication and, where applicable, how such medication needs to be administered at School, if a pupil has any allergies, if a pupil has sustained an injury outside of school (such as a broken bone, sprain or strain) and if a pupil has an underlying condition that we should be aware of.

- **Financial Information of the Parents.** As we are a private school dependent on fees being paid, we need certain financial information about parents of pupils and prospective pupils in order to ensure that School fees are paid. This includes keeping a record of your payment history. We will require more detailed financial information from parents of pupils who are in receipt of/have applied to receive any financial assistance from the School. This is because we need to ensure that they are awarded fairly to pupils according to the relevant criteria.
- **CCTV Footage.** We operate CCTV on School premises for the safety of our pupils and staff. This footage is electronically stored for up to 8 weeks after which it is recorded over. CCTV footage will only be stored for a longer period where we have encountered an incident which necessitates the retention of that footage for administrative or legal purposes. Only authorised personnel have access to viewing and administration of the system.
- **Biometrics.** Biometric access control readers are located at the main reception door, the Nursery entrance door and the Infant playground gate. The use of Biometric technology does not affect user's privacy rights: no images are stored within the templates; data conversion from the scan to the template is a one-way, non-reversible process and all templates are encrypted to prevent tamper. All individuals who are added as users to the system will have an appropriate identification check e.g. photo ID. Only authorised users will add, remove or amend details on the Biometric system. A video intercom system is available for individuals who are not registered on the Biometric system to gain access if appropriate.
- **Photographs of Pupils, Alumni, Staff and Parents.** For example, for our school records and for marketing purposes. We will always inform pupils (or where pupils are not old enough to understand the full implications of photographs being taken, parents) that photographs are being taken and what they will be used for.
- **Information on what you view, click on and access** through our marketing emails and website. For our website, this information may include the site that you came from, and where you went when you left our site. We also track how often you visit and use our website. We do this via email and website cookies, and similar tracking technology built into our website. We make a cookie policy available on our website to give you more detailed information on how we use them.
- **Your Social Media Content.** Where this is in the public domain, and any messages you send direct to us via social media. This information can include

posts and comments, pictures and video footage on sites such as Facebook and Twitter. We use this information to correspond with you if you contact us directly through these sites and we may also use this information for marketing purposes and to stay in contact with our alumni and other supporters of the School.

- **Staff Devices.** We may monitor usage and traffic of the email accounts, social media content and internet use (including use of the School's devices and/or the School's internet facilities) of our staff. We do this to ensure compliance with the requirements of our Code of Conduct for Staff and all other relevant policies relating to Staff, these are all made available to staff on the School's Office 365 shared resources. We may also do this where it is appropriate for the School to do so in connection with the School's legal duties and responsibilities or in accordance with good practice requirements. In doing so, if we find anything that gives us cause for concern or evidences any breach of the terms of the Staff Code of Conduct and/or School policies as above, we may also monitor the content of emails and print and/or save a copy of such email/social media content or any such associated document for use in any disciplinary action and to be saved on that member of staff's record. For more information the Acceptable Use Policy is available on request.

HOW DO WE COLLECT YOUR INFORMATION?

We collect information on you through any of the following, as they apply to you:

- your completed Application Form and Acceptance & Agreement Card
- our website and your use of it, including through our website enquiry form
- your application form or any other information provided to the School in relation to any employment opportunity with the School; emails and other communications you send to us, or that we send to you
- our conversations with you; and
- your use of the School's devices and/or the School's internet facilities
- your use of social media, including "like" buttons and similar functions made available by social media platforms

HOW DO WE USE YOUR INFORMATION?

We use the information we collect for the following purposes:

- to allocate places at the School to pupils
- to provide a safe School and an environment in which the pupils can thrive
- to provide the pupils from potential harm
- to ensure compliance with our School Rules, Staff Code of Conduct and Handbook and procedures and to take any necessary disciplinary actions
- to ensure that parents are able to pay our fees, to collect any debts owing to us and to help us allocate and administer bursaries and instalment plans for the payment of fees

- to provide you with our website, which requires a certain amount of technical information to work properly
- to collect feedback from you about the School
- to contact you regarding your child, in the event of an emergency and regarding any school events but also to enforce a contract if you don't honour it, including the collection of any debts that we may be owed by you
- to reply to any questions, suggestions, concerns or complaints you have contacted us about
- to respond to any social media posts or other public comments you might make, whether they are directed to us or about us
- for recruitment purposes if you have applied for a position with us including to contact you to discuss a role with us and to assess your suitability. As part of this we may combine any personal data you provide to us with other information we obtain independently from social media sites (e.g. LinkedIn or Facebook)
- to ensure compliance by our Staff with the School's policies and procedures and the terms of their employment
- for the purpose of maintaining our alumni network
- to advertise the School to you via email or post according to your preferences where you have expressed an interest in the School or have applied in the past
- to tell you about any changes to our policies. For example, if we change this privacy and data protection policy or our terms and conditions
- to gather statistics about our pupils, prospective pupils and their family backgrounds and
- to monitor how people use our website to see if they are being abused or threatened, for example, by would-be hackers looking to undermine our security

WHO DO WE SHARE YOUR INFORMATION WITH?

We will only ever use your personal data for the purposes set out above. However, we cannot run the School without involving other people and organisations from time to time. When we share your information, we want you to know that we only do so in accordance with our legal data protection and privacy obligations.

Your information may be disclosed to:

- **other schools that you apply to and who request certain information from us.** For example, when your child goes to senior school, the new school may ask whether you have any outstanding obligations at the School or for your child's academic and behavioural record
- **other people who help us provide our website and marketing campaigns.** They include information technology experts who design and host our website and general service companies such as marketing companies who we use to help us with our fundraising or other mail campaigns
- **media and/or press companies** in order to advertise the School and any of the activities that we carry out. We will always collect the express consent of the pupil's parent where we do this
- **our professional advisors** including our lawyers, accountants and technology consultants when they need it to give us their professional advice
- **law or tax enforcement, the courts,** child protection agencies and any other government authority if they ask us to do so (but only if us doing so is lawful)

We may also share the information we collect where we are legally obliged to do so, e.g. to comply with a court order.

Social media, blogs, reviews etc.

Any social media posts or comments you send to us (on our Facebook or Twitter page, for instance) will be shared under the terms of the relevant social media platform (e.g. Facebook or Twitter) on which they're written and could be made public. Other people control these platforms and we are not responsible for this kind of sharing. Before you make any such remarks or observations, you should review the terms and conditions and privacy policies of the social media platforms you use. That way, you will understand how they will use your information, what information relating to you they will place in the public domain, and how you can stop them from doing so if you are unhappy about it.

SECURITY OF YOUR INFORMATION

We take the security of your information very seriously.

We use appropriate procedures and technical security measures to safeguard your information (in paper or electronic format) across all our computer systems, networks, website and premises.

Personal data stored electronically is password protected and mobile devices (such as laptops, memory sticks and mobile phones) are password protected and encrypted where appropriate.

HOW LONG DO WE KEEP YOUR INFORMATION?

To make sure we meet our legal data protection and privacy obligations, we only retain your information for as long as we actually need it for the purposes for which we acquire it (those purposes are set out above). Child protection safeguarding data will be retained according to the School's Safeguarding policy and in compliance with statutory and/or other relevant guidance.

After that we will either delete it or anonymise it so that it cannot be linked back to you.

MANAGING OUR MARKETING COMMUNICATIONS

When your child leaves Greenbank if you would like to stop receiving our email and/or SMS communications, please contact us on office@greenbankschool.co.uk and we will remove you from our marketing list(s).

MANAGING YOUR INFORMATION

It is vital to the health and wellbeing of our pupils and staff and the successful running of the School that the information we gather is accurate and up to date. We need your help to achieve this.

If you have any reason to believe that any of the information we collect on you or your child may be inaccurate, please contact us. Please also contact us to update the information that we hold.

UPDATES TO THIS PRIVACY & DATA PROTECTION POLICY

To ensure the effective running of the School we may need to change what kind of information we collect, how we store it, who we share it with and how we act on it in the future. Consequently, this Privacy and Data Protection Policy may be updated from time to time.

Whenever we make any significant changes to this policy, we will post a revised version on our website and notify parents, pupils and staff and alumni that we have done so. If at any time you are unhappy with changes to the way we process your data or your child's data, please contact us to discuss your concerns.

WHERE TO GO IF YOU WANT MORE INFORMATION ABOUT YOUR PRIVACY RIGHTS

The Information Commissioner's Office (ICO) regulates data protection and privacy matters in the UK. They make a lot of information accessible to consumers on their website and they ensure that the registered details of all data controllers such as ourselves are available publicly. You can access the ICO website here:

<https://ico.org.uk/>.

You can make a complaint to the ICO at any time about the way we use your information. However, we hope that you would consider raising any issue or complaint you have with us first. Your satisfaction is extremely important to us, and we will always do our very best to solve any problems you may have.