



Privacy Notice

Who we are

For the purposes of this policy Newbridge Preparatory School ("The School", "we") refers to any organisation which is part of the Newbridge Preparatory School Community and includes the Parents, Staff and Friends Association. This notice is designed to conform to the General Data Protection Regulation (EU 2016/679) and the UK General Data Protection Act 2018. We will refer to this as Data Protection Law.

Who to contact

The Headmistress, Mrs Fisher, is our named individual responsible for data protection. She is lead of a team of who oversee how we process your data: the GDPR team comprises the Headmistress, the Deputy and the Office Manager. If you have a question, issue or wish to change the way we currently use your data please contact the Newbridge Preparatory School GDPR team in writing: The GDPR Team, Newbridge Preparatory School, 51 Newbridge Crescent, Tettenhall, Wolverhampton, WV6 0LH.

What we do with your data

This privacy notice is intended to provide information about how we will use (or "process") personal data about individuals including: its current, former and prospective staff; its current, past and prospective pupils; their parents, carers or guardians (referred to in this document as "parents"); and any other members of the Newbridge Preparatory School Community. This information is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used. All members of the Newbridge Preparatory School Community are all encouraged to read this Privacy Notice and understand the School's obligations to its entire community.

This **Privacy Notice** applies alongside any other information we may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This **Privacy Notice** applies in addition to our other relevant terms, conditions and policies. These include but are not limited to:

- any contract between the School and its staff or the parents of pupils;
- the School's policy on taking, storing and using images of children;
- the School's CCTV (where used);
- the School's retention of records policy;
- the School's safeguarding or health and safety policies, including as to how concerns or incidents are recorded; and
- the School's IT policies, including its Acceptable Use policy, WiFi policy and Remote Working policy.

Anyone who works for, or acts on behalf of, Newbridge Preparatory School (including staff, volunteers, Directors and service providers) should also be aware of and comply with this Privacy Notice and all relevant school policies.

Why the School needs to process personal data

The lawful basis for data processing as set out in data protection law include the following:

- Consent
- Contract
- Legal obligation
- Vital interest
- Public Task
- Legitimate interest

We will always seek to process data only when necessary. We will be targeted in and proportionate in our processing to achieve a purpose. In order to carry out our ordinary duties to members of the Newbridge Preparatory School Community (including staff, pupils, former pupils and parents) we may process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of our daily operation. We will need to carry out some of this activity in order to fulfil our legal rights, duties or obligations – including those under a contract with its staff, or parents of its pupils. All six basis are equally valid for processing data but we are obliged to inform you of the basis under which we process your data.

Other uses of personal data will be made in accordance with our 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.

We expect that the following uses may fall within the category of the Schools (or its community's) "**legitimate interests**":

- For the purposes of pupil admission (and to confirm the identity of prospective pupils and their parents);
- To provide education services, including musical education, physical or spiritual development and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Maintaining relationships with past pupils 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 (such as diversity or gender and taxation records);
- 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, staff and parents in school publications, on the School 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 individuals;
- To enable payments to be made where appropriate to individual service providers.
- For security purposes, including CCTV in accordance with the School's CCTV policy; and
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School;

In addition, we may need to process **special category personal data** (concerning health, ethnicity, religion or sexual orientation) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on us by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons may 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 where it is in the individual's interests to do so: for example for medical advice, social services, insurance purposes or to organisers of school trips;
- 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;
- In connection with employment of its staff and volunteers, for example DBS checks, welfare or pension plans;
- To provide suitable food and drink at School or an event while being respectful of religious, cultural and or medical requirements, including allergies.
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with our legal obligations and duties of care.

Types of personal data we process

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities or use their car for work related tasks);
- bank details and other financial information, e.g. about parents who pay fees to the School;
- past, present and prospective pupils' academic, disciplinary, admissions, assessment and attendance records (including information about any special needs), and examination scripts and marks;
- where appropriate, information about individuals' health, and contact details for their next of kin;
- records of gifts made and any gift aid declarations

- references given or received by the School about pupils, and information provided by previous educational establishments and/or other professionals or organisations working with pupils; and
- images of pupils, staff and parents (and occasionally other individuals) engaging in school activities, and images captured by the School's CCTV system (in accordance with the School's policy on taking, storing and using images);

Where we collect information about you from

We collect information in the following ways:

When you give it to us DIRECTLY

You may give us your information as a prospective, current or former pupil, or member of staff, or parent, or in order to receive information from the School, sign up for one of our events, make a donation, purchase our products or communicate with us. Sometimes when you support us, your information is collected by an organisation working for us (e.g. an online payment), but we are responsible for your data at all times.

When you give it to us INDIRECTLY

Your information may be shared with us by independent organisations for example fundraising sites like *Just Giving* or *Virgin Money Giving*. These independent third parties will only do so when you have indicated that you wish to share your details with the School and with your consent. You should check their Privacy Policy when you provide your information to understand fully how they will process your data.

When you give permission to OTHER ORGANISATIONS to share or it is available publicly

We may receive and record information from organisations such as DfE or individual schools and Nursery that we use to better understand our pupils' and to inform advice given to current pupils. We may combine information you provide to us with information available from external sources in order to gain a better understanding and to improve our methods, products and services. The information we get from other organisations may depend on your privacy settings on these sites or the responses you give, so you should regularly check them. This information comes from the following sources:

Third party organisations

You may have provided permission for a company or other organisation to share your data with third parties, including charities. This could be when you buy a product or service, register for an online competition.

Social Media

Depending on your settings or the privacy policies for social media and messaging services like Facebook, WhatsApp or Twitter, you might give us permission to access information from those accounts or services. By joining an official school page or group in social media, you consent to allowing us to contact you through that platform.

Information available publicly

This may include information found in places such as Companies House and information that has been published in articles/newspapers. This information is already in the public domain.

When we collect it as you use our websites

Like most websites, we use “cookies” to help us make our sites – and the way you use them – better. Cookies mean that a website will remember you. They are small text files that sites transfer to your computer (or phone or tablet). They make interacting with a website faster and easier – for example by automatically filling your name and address in text fields.

In addition, the type of device you are using to access our website and the settings on that device may provide us with information about your device, including what type of device it is, what specific device you have, what operating system you are using, what your device settings are, and why a crash has happened. Your device manufacturer or operating system provider will have more details about what information your device makes available to us.

CCTV

Some parts of our school site may be monitored by CCTV. We use any video and audio recorded to protect our pupils, staff and visitors while they are on site, to deter crime, and to help maintain good order within the School grounds. We retain this information for a period of up to three months. Access to CCTV footage is controlled. CCTV footage may be passed onto the Police or other relevant authorities.

Who helps us process your data

Occasionally, we will need to share personal information relating to our community with third parties, such as:

- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- government authorities (e.g. HMRC, DfE, police or the local authority);
- appropriate regulatory bodies (e.g. The Independent Schools Inspectorate ISI, The Charity Commission or the Information Commissioner).
- Associated bodies including IAPS, ISA and ISC; and
- The Parents, Staff and Friends of Newbridge Preparatory School Association

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
- pastoral or safeguarding files
- Special Educational Needs and Disability (SEND)

However, a certain amount of any 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 Local Authority Designated Officer, LADO or police. For further information about this, please view the School’s Safeguarding Policy.

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

How we store your data

We store your data securely on our network and on remotely held secure servers within the UK. We regularly back up our data to a secure remote server. Data collected using a third party application, such as Engage, Double First, Parents Evening System, Purple Mash, Wordsmith, Lessons Learned will be stored on the third party's server. We only use third parties which comply with all relevant GDPR information. Physical data is stored securely in offices and secure storage cupboards at School. Access to physical and digitally held data is restricted to appropriate school staff and volunteers.

How long we keep personal data

We 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 legal recommendation for how long to keep ordinary staff and pupil personnel files is up to the pupils 25th birthday. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements. Specific details of a pupil's time at school are kept on the school database and stored indefinitely for past pupils. If you have any specific 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 the GDPR Team. However, please bear in mind that we 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, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of that fact in order to fulfil your wishes (called a "suppression record").

Keeping in touch and supporting the School

The School will use the contact details of parents, past pupils and other members of the School community to keep them updated about the activities of the School, or past pupils 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 past pupils, as appropriate, with organisations set up to help establish and maintain relationships with the School community, such as The Parents, Staff and Friends of Newbridge Preparatory School Association.
- Contact parents and/or past pupils (including via the organisations above) by post and email in order to promote and raise funds for the School.
- Collect information from publicly available sources about parents' and former pupils' occupation and activities, in order to maximise the School's potential and improve community reach.
- Should you wish to limit or object to any such use, or would like further information about them, please contact the GDPR Team in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising by Newbridge Preparatory School. However, we are 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

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the School, and in some cases ask for it to be erased or amended or have it transferred to others, or for the School to stop processing it – but subject to certain exemptions and limitations. Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the GDPR Team. We 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). We 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 (and parents need to be aware this may include their own children, in certain limited situations – please see *Pupil Requests* below), 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). We are not required to disclose any pupil test or assessment papers (or other information consisting solely of pupil test answers), provide assessment or other test marks, 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

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. Pupils at Newbridge Preparatory School are generally not assumed to have the level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home to make requests about their own data. Older children, particularly those in their final year at Newbridge Preparatory School (Year Six), may however be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

Parental requests

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. We 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. 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 we are relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Examples where we do rely on consent are: certain types of uses of images, certain types of marketing and fundraising activity. 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. That reason will usually have been asserted under this Privacy Notice, or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, services or membership of an organisation such as parents' association has been requested). Consent is given by signing an acceptance form of the schools' terms and conditions prior to entry.

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). In general, the School will assume that pupil 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. Staff are under professional duties to do the same covered under the relevant staff policy. Staff are also required to respect the personal data and privacy of others and comply with all School policies.

Data Accuracy and Security

We will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Where possible we use publicly available sources to keep your records up to date; for example, the Post Office's National Change of Address database and

information provided to us by other organisations as described above. We regularly contact parents, past pupils and Friends of the School with ways they can update their information and have self-update systems in place for these users. We really appreciate it if you let us know if your contact details change by contacting the school office. An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why we may need to process your data, of who you may contact if you disagree. The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems. All staff and Directors will be made aware of this notice and their duties under Data Protection Law and will receive relevant training.

Direct Marketing

We will contact you to let you know about activities at the School, news about current and former pupils, and to ask for donations or other support. The weekly newsletter, the school website and Facebook are examples of this. Occasionally, we may include information from partner organisations or organisations who support us in these communications. If you do not want to hear from us, that is fine. Just let us know when you provide your data or contact us at the GDPR Team. We do not sell personal details to third parties. We do share some information with The Parents, Staff and Friends of Newbridge Preparatory School Association. We have a statutory duty to share some information when requested with government bodies when requested.

Photographs and Videos

We use photographs and videos of pupils, parents, staff, Past pupils, volunteers and other guests at School events for marketing, fundraising and other publicity purposes. We understand there are many valid reasons why you may not wish us to use your photograph or photographs of your children in this way. This is fine, just let us know you would like to opt out of giving your photography permission by contacting the GDPR Team in writing.

Pupil Data

Pupil data is updated on a regular basis by staff, parents and pupils. Parents and Pupils are regularly invited to update pupil data where necessary.

Sharing your story

Some people choose to tell us about their experiences at the School and or share photographs and memorabilia from their time at the School. They may also share stories about their life before or after their time with the School. If we have the explicit and informed consent of the individual, or their parent or guardian if they are under 18, this information may be made public by us at events, in material promoting the School or in documents such as the weekly newsletter.

Your right to know what we know about you, make changes or ask us to stop using your data

You have a right to ask us to stop processing your personal data, and if it is not necessary for the purpose you provided it to us for (e.g. registering you for an event) we will do so. You

have a right to ask for a copy of the information we hold about you. If there are any discrepancies in the information we provide, please let us know and we will correct them. If you want to access your information, send a description of the information you want to see and proof of your identity by post to: The GDPR Team. We do not accept these requests by email or telephone so we can ensure that we only provide personal data to the right person. If you believe that we have not complied with this notice or acted otherwise than in accordance with Data Protection Law, they should utilise the School complaints procedure and should also notify the GDPR Team. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the School before involving them.

Building profiles of supporters and targeting communications

When building a profile we may analyse geographic, demographic and other information relating to you in order to better understand your interests and preferences in order to contact you with the most relevant communications. In doing this, we may use additional information from third party sources when it is available. Such information is compiled using publicly available data about you, for example addresses.

Changes to this Notice

We may change this Privacy Notice from time to time. If we make any significant changes in the way we treat your personal information we will make this clear on the Newbridge Preparatory School Website or by contacting you directly. If you have any questions, comments or suggestions, please let us know by contacting the GDPR Team.

Legal Underpinning of this Privacy Notice.

Various laws underpin this Privacy Notice and are relevant to Newbridge Preparatory School.

- The Data Protection Act 1998 and related statutory instruments (until 25 May 2018)
- The General Data Protection Regulation (from 25 May 2018)
- The Data Protection Act 2018 and related legislation (from 25 May 2018, form TBC)
- The Privacy and Electronic Communications Regulations 2011 (PECR) (to continue after 25 May 2018 until replaced by the ePrivacy Regulation – form and date TBC)
- The Protection of Freedoms Act 2012 (biometrics and CCTV)

Please note that independent schools are not subject to the specific information provisions (including the parental right to see the pupil record, and Freedom of Information).

Specific Information (*In alphabetical order*)

Accidents and Incidents

Newbridge Preparatory School keeps a record of all accident and "near miss" incidents that occur on site or as part of its activities. This is a legal requirement and helps us to monitor the health and safety of Staff, Pupils, and other visitors. Anyone who sustains an injury while on site or working away on School business, should complete an accident report.

Agents

Newbridge Preparatory School occasionally uses agents to assist in the recruitment of staff. Where Newbridge Preparatory School receives information from an agent, it does so under the terms of the agent's privacy notice. Applicants who apply to Newbridge Preparatory School through an agent should familiarise themselves with their agent's privacy notice.

Applications & Enquiries

By completing an enquiry form or by making an enquiry in person, over the phone or by email you consent to your details being used to facilitate the admissions process. You can remove yourself and your family from the admissions process at any time by contacting the admissions team. Data collected during an initial enquiry will be used for a full range of marketing activities, including sending School publications, notification of open days and other recruitment events. Unless you notify us otherwise, emails, letters and other communications with applicants may be tracked and stored for up to 15 years to ensure that we are better able to tailor our future recruitment processes. While processing your application, information concerning your child's performance at school, including their attendance record; school reports and examination results and financial information including information about the payment of fees may be requested from their current and or former schools. Once a child has been admitted to the School the information on their formal application will form the basis of their pupil record and will be retained indefinitely.

Bursaries

In order to assess applications for bursaries fairly, the School requests information and documentation relating to the financial circumstances of those who have applied for means tested financial assistance. External publically available information may also be sought. All such information is treated as highly confidential and access to this financial information is strictly limited. Means tested assistance is reviewed regularly, and the information provided during the assessment process is stored for up to seven years after the pupil leaves the School.

Archives

Records considered to be of historic value are retained in Newbridge Preparatory School's archive indefinitely.

Current and Former Parents and Guardians

As a current or former parent your data will be used for a full range of activities, including sending School publications, collection of School Fees, promotion of benefits and services available to parents and former parents, notification of Parents, Staff and Friends of Newbridge Preparatory School Association events and the sending of messages. Emails, letters and other communications with the School and The Parents, Staff and Friends of Newbridge Preparatory School Association may be tracked and stored to ensure that we are better able to tailor our future communications.

Current Pupils

We hold personal data pertaining to children and use it to: support their teaching and learning; monitor and report on their progress; provide appropriate pastoral care; and assess how well we are doing as a school. This information includes a pupil's contact details,

assessment results, attendance information and personal characteristics such as ethnic group, any special educational needs and relevant medical information. Newbridge Preparatory School issues all pupils with an Admissions Pupil Number (APN).

Activities / Trips / Visits / Residential

Newbridge Preparatory School collects and shares such information as necessary to facilitate pupil trips and visits both as part of its regular curriculum and as part of its extra-curriculum programme. For example, it may be necessary to share medical information with staff taking a trip out of School. It may also be necessary to share this data with the relevant organisation.

Display and Storage of Pupils' Work

As part of the normal operation of the School it is necessary to collect, mark, display and distribute pupils work. Staff must be cautious when arranging for the display or circulation of work that it does not inadvertently share biographical or other personal data. For example, a birthday wall in an EYFS classroom should not contain the date of birth, only the month a child is born. Grading of work, and the storage of those grades will be collected by staff and shared with other staff as necessary to provide a suitable learning experience for pupils and for monitoring and assessing pupils, staff and our educational programmes. Marks may be shared with external bodies such as GL Assessment and Standards and Testing Agency.

Medical Records

When a pupil accepts a place at Newbridge Preparatory School, data relating to the health and medical record of that pupil will be collected. This might include medical records, details of any illnesses, allergies or other medical conditions suffered by the pupil. Medical Records are Special Category Data, and the School uses this information in order to safeguard and promote the welfare of its pupils, for example the School uses details of any medical conditions so that staff will be able to respond appropriately in the event of a medical emergency. Medical record pertaining to a pupil will be destroyed after the pupil's 25th birthday.

Special Educational Needs (SEN)

When a pupil accepts a place at Newbridge Preparatory School, data relating to any disabilities and or special educational needs of that pupil will be collected. This might include by way of example medical records and or records of SEND assessments. SEND Data is Special Category Data. Relevant SEND information will be shared with Newbridge Preparatory School Staff where appropriate to ensure that pupils with special educational needs are given the best possible learning, co-curricular and pastoral experience. Relevant information will also be shared externally with appropriate educational bodies for example with an examination or other awarding body. SEND information will also be used to measure the effectiveness of our SEND programme. SEND records pertaining to a pupil will be destroyed after the pupil's 25th birthday.

Examination Results and Achievements

It has long been a tradition at Newbridge Preparatory School to publish, places and scholarships offered at senior schools in the local media, on websites and in the school newsletter. Students or their parents may request not have their results published. Similarly, winners of School prizes, Officer's positions, and other notable achievements are celebrated

in publications such as the Speech Day Programme and the School Newsletter. Some are also presented on the school *Honours Boards*. Anonymised academic results may be shared with other organisations to facilitate the compilation of league tables and other metrics including “value added”. Details and or copies of certificates and awards gained in school and those sent in from home will be celebrated in assembly and printed in the school newsletter.

Debtors

Newbridge Preparatory School reserves the right to pursue all debtors to the School and organisations within the School Community. In extreme cases, we may work with a debt collection agency. Any actions taken to recover debts will be reasonable and proportionate to the amount owed. If we are unable to contact you using the contact information you have provided we reserve the right to use that data to trace your current contact details to enable the matter to be resolved.

Due Diligence

There are a number of occasions where it is prudent for Newbridge Preparatory School to run checks into the background of donations, suppliers, Bursary recipients, parents and past pupils. For example if a past pupil pledges a large gift to the School or where the School intends to make a significant purchase from a supplier. Where the School deem it necessary to do so we reserve the right to perform credit checks and other legitimate forms of due diligence processing.

EYFS

Data from the Early Years Foundation Stage, in the form of photographs and observations is shared with parents through the 2 Build a Profile system. Where parents claim early years funding we share that information with government agencies for reporting and monitoring purposes, including pupil name, age and attendance data.

Email

By its very nature, all email contains personal data, and Newbridge Preparatory School takes a number of steps to secure its email systems. By emailing Newbridge Preparatory School the contents of your email, including your email address will be logged and stored on the School’s IT systems. Your email address will then be used for future relevant correspondence, unless you request otherwise.

Events

By booking to attend a School, particularly using the Parents Evening Portal, you agree that your data can be processed by Newbridge Preparatory School in order to facilitate your attendance at that events and similar future events that we believe may be of interest to you.

Food and Drink

Where necessary we may collect and store meal preferences and information about allergies and other food related medical conditions for use in events both on and off site and for serving meals and other foods at School. This information may include special category data about medical conditions and or ethnicity and religious beliefs.

Gifts

Records of gifts, including Gift Aid will be kept indefinitely so we can continue to engage with supporters making donations and their families. Donors are asked if they would like their gifts recognised publically and have the option of being able to opt out of doing so.

IT

Use of our WIFI and other networks is monitored. We may record how many times you use a service, where you use it, at what times you use it, the quantity of data traffic and how long each session lasts as well as which sites you access. This information helps us to build a profile of our users for statistical purposes and to improve how we provide our service to you. IT usage that infringes our acceptable use policy may be shared with the relevant staff and or authorities so that appropriate action can be taken. Most of this data will be aggregated into groups, which means that we will not be able to identify you individually. However to enforce our acceptable use policy we may collect identifying information about you and your devices including IP address, cookies, and or user information. Our IT systems are backed up offsite, and some of our systems use cloud based storage. Off-site storage of data only happens on secure regulated servers within the UK. Some data is collected using online forms. This data is also stored securely.

Lettings

Any individual entering into a contract to let or rent part of Newbridge Preparatory School's facilities agrees to the School processing their data to fulfil the contract. We will also use your data to offer you information about similar opportunities in the future. We may also use information to promote future events and lettings.

Past Pupils

As a former pupil, your data will be used for a full range of past pupils activities, including sending School publications, promotion of benefits and services available to past pupils, notification of past pupils events and the sending of SMS text messages id appropriate. Your data will also be used in the School fundraising programmes and related research, which in turn may include wealth screening and analysis. Emails, letters and other communications with the School and may be tracked and stored, to ensure that we are better able to tailor our future communications.

Professional Photography

School individual and group photographs are taken annually. A whole school photograph is taken bi-annually. It is current practice to print each pupil's first name and surname underneath both group and whole school photographs. This data will be shared with the photography company in advance. These photographs displaying the name and photographs of pupils may also be displayed within the school building. Parents may request not have their child in these photographs. Allowing a child to have their photograph taken is giving consent to the use of these photographs indefinitely.

Sales

To fulfil our obligations to individuals who purchase items of second hand uniform or other incidental merchandise (i.e. photographs, DVDs) we will need to process your personal data. This will include payment information, order details, and if delivering an item contact

details. When arranging delivery we will need to pass your contact details to a third party delivery company. This data will include geographical address, email and phone number.

Scholarships

Pupil's records will include all scholarships and awards.

Self Employed Staff

We process personal data relating to self-employed staff at Newbridge Preparatory School. This is for employment purposes and to assist in the running of the School, for example to enable appropriate background checks to be completed.

Staff & Students

We process personal data relating to those we employ to work at, or otherwise engage to work at, Newbridge Preparatory School. This is for employment purposes to assist in the running of the School and to fulfil our contractual arrangements, for example enabling individuals to be paid and to enable appropriate background checks to be completed.

This personal data includes identifiers such as names and National Insurance numbers and characteristics such as employment contracts and remuneration details, qualifications and absence information. We will not share information about you with third parties without your consent unless the law requires us to.

In addition, we process personal data relating to individuals applying for roles at the School. Information related to unsuccessful applicants is destroyed within 12 months of their application being processed unless their consent has been given to retain the data.

In the case of students, Newbridge Preparatory School will share any information required by the student's institution as set out in the student's contract with the institution.

Training

Newbridge Preparatory School encourages its staff, students and volunteers to undergo training from time to time. As part of this process it may be necessary to share information such as previous qualifications, driver's licence details or other personal information with training providers and or awarding bodies. Records of such training are stored by the School.

Volunteers

We are grateful to past pupils, parents and other friends of the School who give of their time to support School activities. We necessarily require volunteers to provide information including name, contact details, address and date of birth. Where appropriate we may require regular volunteers to supply further information to enable us to carry out suitable background checks. Volunteers who wish to receive communications from the School will be asked to share relevant data to do so.

Directors

A special category of volunteer are the Directors (Governors) of the School, who are the charity's trustees. We process personal data relating to Directors and prospective Directors of Newbridge Preparatory School. This data will be shared with external bodies including the school accountants, the Charity Commission and Companies House.

If you would like to exercise any of the rights listed above including a subject access request, or if you no longer wish to receive information from Newbridge Preparatory School, please write to us:

The GDPR Team
Newbridge Preparatory School
51 Newbridge Crescent
Tettenhall
Wolverhampton
WV6 0LH.

For further information see the Information Commissioner's guidance on the ICO Website <https://ico.org.uk/>.

This Privacy Notice was last updated in May 2018. Newbridge Preparatory School reserves the right to vary this Privacy Notice from time to time. When we make significant changes we will notify our contacts via email (unless specifically agreed otherwise) and we will publish a notification on our website.

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