

## HOW WE USE YOUR INFORMATION

### PRIVACY NOTICE FOR PARENTS

#### WHO WE ARE

Whitgift School is a member of the John Whitgift Foundation, a registered charity (number 312612), with Head Office at North End, Croydon, Surrey, CR9 1SS. The Foundation encompasses J W Educational Ltd, Company Number 03470213, with the same registered address. JW Educational Ltd runs the Whitgift School Shop and Whitgift Fitness and Wellbeing Centre. A separate Privacy Notice is provided for J W Educational Ltd.

The John Whitgift Foundation is registered with the UK Information Commissioner's Office as a Data Controller through the payment of the Data Protection Fee. It is committed to complying with all aspects of data protection and its responsibilities under both the General Data Protection Regulation (EU 2016/679) and the UK Data Protection Act 2018.

This Privacy Notice relates specifically to Whitgift School, Haling Park, South Croydon, CR2 6YT and to the parents of Whitgift School students. It covers both the parents' own data and that of their sons. However it should be noted that a Privacy Notice is provided specifically for Whitgift School students and their personal data belongs to them. As a part of the John Whitgift Foundation data may be held by either or both of the School and the John Whitgift Foundation.

#### WHAT THIS PRIVACY NOTICE IS FOR

This Notice is intended to provide information about how and why the School will use (or "process") personal data about individuals including its current and past students; and their parents, carers or guardians (referred to in this policy as "parents").

Personal data is information about you from which you can be identified (either directly or indirectly). For example, information about your family circumstances, your financial information and photos of you.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Parents and students 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 the School may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This Privacy Notice also applies in addition to the School's other relevant terms and conditions and policies, including:

- the contract between the School and the parents of students;
- the School's policy on taking, storing and using images of children;
- the School's CCTV policy;
- the School's Data Protection Policy;
- the School's safeguarding, pastoral, 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 and eSafety Policy.

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 the John Whitgift Foundation's Employee Privacy Statement, which also provides further information about how personal data about those individuals will be used.

## **RESPONSIBILITY FOR DATA PROTECTION**

The John Whitgift Foundation, as the Data Controller, will deal with all your requests and enquiries concerning the School's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this Notice and Data Protection Law.

Please contact the John Whitgift Foundation by email at [enquiries@johnwhitgiftfoundation.org](mailto:enquiries@johnwhitgiftfoundation.org), by telephone on 020 8680 8499 or by post to John Whitgift Foundation, North End, Croydon, CR9 1SS.

## **WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA**

In order to carry out its ordinary duties to students and parents, the School needs to process a wide range of personal data about individuals (including students or parents) as part of its daily operation.

Some of this activity the School will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with the parents of its students.

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.

Appendix 1 contains more detail about the purposes for which your personal data is used, the applicable lawful bases as well as further information about sources and recipients. It does not say anything different to what is set out here but does go into more detail.

The School expects that the following uses will fall within the category of **legal obligation**:

- The provision of student data to the Department for Education;
- The provision of student and/or parent data to the relevant authorities to fulfil the School's legal obligations in relation to safeguarding;
- The provision of student data to His Majesty's Immigration Service in relation to the undertaking of academic study in the UK by non-EU citizens;
- The provision of information on rare occasions to third parties such as the courts and legal representatives, the local authority or the police where legally obliged to do so.

The School expects that the following use will fall within the category of **contract**:

- To carry out our obligations and enforce our rights under our contract with you;
- To provide education services, including musical education, physical training or spiritual development, career services, and extra-curricular activities to students, and monitoring students' progress and educational needs (ie to teach your child);

- To look after your child:
- To update parents on their son's progress and so that we can contact them if there is a concern.

The School expects that the following uses will fall within the category of **legitimate interest**:

- For the purposes of student selection (and to confirm the identity of prospective students and their parents);
- Maintaining relationships with alumni and the school community, including newsletters, details of events, direct marketing or fundraising activity;
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background [and relevant interests];
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or gender pay gap analysis);
- 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 students, including relating to outstanding fees or payment history, to/from any educational institution that the student attended or where it is proposed they attend; and to provide references to potential employers of past students;
- To enable students to take part in national or other assessments, and to publish the results of public examinations or other achievements of students of the School;
- To safeguard students' 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; (this may also be a **public interest** task)
- To make use of photographic images of students 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 children;
- For security purposes, including CCTV in accordance with the School's CCTV policy;
- To carry out or cooperate with any School or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the school.

In addition, the School will on occasion need to process **special categories of personal data** (concerning health, ethnicity or religion) in accordance with rights or duties imposed on it by law, including as regards safeguarding, or from time to time by explicit consent where required. These reasons will include:

#### **To Protect the Vital Interests of the Data Subject:**

- To safeguard students' 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 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;
- To provide educational services in the context of any special educational needs of a student;

- 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; or

### **To Comply with Legal Obligations or for the Establishment, Exercise or Defence of Legal Claims:**

- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.
- For the establishment, exercise or defence of legal claims.

### **TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL**

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- bank details and other financial information, e.g. about parents who pay fees to the John Whitgift Foundation;
- past, present and prospective students' academic, disciplinary, pastoral, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- where appropriate, information about individuals' health, welfare or safeguarding, and contact details for their next of kin;
- references given or received by the School about students, and relevant information provided by previous educational establishments and/or other professionals or organisations working with students;
- correspondence with and concerning students and parents past and present; and
- images of students (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 of children and the School's CCTV policy);

### **HOW THE SCHOOL COLLECTS DATA**

Generally, the School receives personal data from the individual directly (including, in the case of students, from their parents). This may be via a form (such as the Admissions forms), or simply in the ordinary course of interaction or communication (such as email or written assessments).

However in some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities working with that individual).

### **WHO HAS ACCESS TO PERSONAL DATA AND WHO THE SCHOOL SHARES IT WITH**

Occasionally, the School will need to share personal information relating to its community with third parties, such as:

- professional advisers (e.g. medical staff, 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);
- other educational institutions (e.g. past or prospective); and

- software and educational resource and cloud storage providers

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 Doctor and appropriate medical staff under his/her supervision, or otherwise in accordance with express consent); and
- pastoral or safeguarding files.

However, a certain amount of any SEND student's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the student requires.

If your child has an educational guardian, we may need to share information with them and/or with any homestay appointed to provide accommodation.

Students 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 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.

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, web developers or software 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. Occasionally this may require personal data to be transferred internationally, such as for cloud storage. Where this is outside of the EEA, then contractual clauses are in place in order to provide the same level of protection as if the data were held in a country directly under the remit of the GDPR.

## **HOW LONG WE KEEP PERSONAL DATA**

The School will retain personal data securely and only in line with how long it is necessary to keep it for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary student personnel files is up to 7 years following departure from the School. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

Images of and references to your child in School publications, along with a minimal archival record (such as name, years at the school and post-school destination) may be retained indefinitely in the School's archives.

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 Whitgift School Director of Estates and Facilities, in his role as the School's Data Protection Compliance Manager. The Director of Estates and Facilities can be contacted on [js@whitgift.co.uk](mailto:js@whitgift.co.uk), via the School switchboard on 020 8688 9222 or by post at Whitgift School, Haling Park, South Croydon, CR2 6YT.

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. The School's Retention Schedule is available on 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 the 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, 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, such as Whitgift for All;
- Contact parents and/or alumni (including via the organisations above) by post and email in order to promote and raise funds for the School;
- Should you wish to limit or object to any such use, or would like further information about them, please contact the John Whitgift Foundation in writing. 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, etc.

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 John Whitgift Foundation, ideally via email to [enquiries@johnwhitgiftfoundation.org](mailto:enquiries@johnwhitgiftfoundation.org) or otherwise addressed to the John Whitgift Foundation, North End, Croydon, CR9 1SS.

The Foundation 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 Foundation 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 Foundation 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 further 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).

The Foundation is also not required to disclose any student examination scripts (or other information consisting solely of student 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.

- Student requests

Students 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 (see section Whose Rights? below). A student of any age may ask a parent or other representative to make a subject access request on his behalf.

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

Students of Whitgift School 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 students without their consent. The School may consider there are lawful grounds for sharing with or without reference to that student.

Parents will in general receive educational and pastoral updates about their children. Where parents are separated, the School will 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 students – 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 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 and certain types of 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. a parent contract, or because a purchase of goods, services or membership of an organisation such as an alumni association has been requested).

- 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 students – for example, under the parent contract, or via a form. Parents and students 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 student's age and understanding – to seek the student'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 students' 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 student's activities, progress and behaviour, and in the interests of the student's welfare. That is unless, in the School's opinion, there is a good reason to do otherwise.

However, where a student 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 student or other students, or if required by law.

Students are required to respect the personal data and privacy of others, and to comply with the School's relevant policies, e.g. IT: acceptable use policy and the School Rules.



## **DATA ACCURACY AND SECURITY**

The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify the relevant person, (normally the School Office) of any significant changes to important information, such as contact details, held about them.

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 the School may need to process your data and 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 governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

## **THIS NOTICE**

The School will update this 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.

## **QUERIES AND COMPLAINTS**

Any comments or queries on this Notice should be directed to the Director of Estates and Facilities at Whitgift School, in his role as the School's Data Protection Compliance Manager, using the following contact details: [js@whitgift.co.uk](mailto:js@whitgift.co.uk), 020 8688 9222 or Whitgift School, Haling Park, South Croydon, Surrey, CR2 6YT.

If an individual believes that the School has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the School Complaints Procedure and should also notify the John Whitgift Foundation. 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 the regulator.

Reviewed by The Director of Estates and Facilities: September 2023

Next review: September 2024

### **Our purposes and lawful bases in more detail**

This section contains more detail about the purposes for which your personal data is used, the applicable lawful bases as well as further information about sources and recipients. It does not say anything different to what is set out above but does go into more detail.

We have also used a coded system so that you can see which bases we are relying on for each of the purposes described at paragraphs 1 to 46 below. LI means legitimate interests, CT means contract, PI means public interest, LO means legal obligation and VI means vital interests. So (LI, PI) means that we are relying on both legitimate interests and public interest for that purpose.

1 The School's primary reason for using your personal data is to provide educational and pastoral services to your child (LI, CT, PI).

2 We will use information about you in order to process your application for your child's admission to the School. We obtain information about you from the admissions forms and from your child's previous school(s). We may also get information from professionals such as doctors and local authorities (LI, CT, PI).

3 We will have information about any family circumstances which might affect your child's welfare or happiness. This is to help us provide appropriate care and support to your child (LI, CT, PI).

4 We may use medical information about you if we need this to look after your child (LI, CT, PI).

5 We will need information about any court proceedings, court orders or criminal petitions which relate to you. This is so we can safeguard the welfare and wellbeing of your child and the other pupils at the School (LI, CT, PI).

6 We use CCTV to help make the School site safe and for crime detection and prevention. We may also use CCTV in relation to complaints and any incidents which take place on our sites (e.g. accidents involving vehicles in our car park(s)). Images captured of you via CCTV will be your personal data. CCTV is not used in private areas such as toilets or changing rooms (LI, CT, PI, LO). For more information about our use of CCTV please see our CCTV Policy.

7 We will use your personal data to take other steps to make sure the School site and buildings are safe, for example, we keep a record of visitors to the School site (LI, PI, LO).

8 If there is a complaint or grievance made to the School that involves you, then we will use your personal data in connection with that complaint or grievance (LI, PI).

9 The School may share information about you with the local authority for the purpose of the preparation, implementation and / or review of your child's Education and Health Care Plan (LI, PI, LO).

10 Where appropriate, the School will have information about your religious beliefs or other beliefs and practices. For example, if you do not eat certain foods (LI, PI).

11 We may use your personal data in order to help make the School better, for example, to raise money for the School (LI).

- 12 We may take photos or images (including video recordings) of you at School events to use on social media and on the School website. This is to show prospective parents and pupils what we do here and to advertise the School. We may continue to use these photos and videos after your child has left the School (LI).
- 13 We will send you information to keep you up to date with what is happening at the School. For example, by sending you information about events and activities taking place (including fundraising events) and the School newsletter (LI).
- 14 We will keep details of your address when your child leaves the School so we can find out how your child is progressing (LI).
- 15 We may use your personal data when ensuring network and information security, for example, our anti-virus software might scan files containing information about you (LI).
- 16 We monitor our pupils' use of the internet and any internet based platform, and email as part of our safeguarding duties. On occasion, this may involve your personal data, e.g. if you have sent your child a message to their school email address (PI).
- 17 We also keep some information indefinitely for archiving purposes (this is known as "archiving in the public interest" under data protection law) and for historical research purposes.
- 17.1 This includes the School's legitimate interest in research; supporting long-term accountability; enabling the discovery and availability of the School and the wider school community's identity, memory, culture and history; enabling the establishment and maintenance of rights and obligations and of precedent decisions; educational purposes; and commercial and non-commercial re-use.
- 17.2 For example, we keep some old photos so that we have a record of what the School was like in the past. Information held in our archive may be made publicly available but this would only be done in compliance with data protection laws (LI, PI).
- 18 We may use your personal data in connection with legal disputes, for example, we may have to disclose your personal data as part of court proceedings (LI, PI, LO).  
Financial information
- 19 We may process information about you in relation to the payment of fees and for risk management and compliance purposes. In some cases we get information about you from third parties such as credit reference agencies or from your child's previous school(s) (LI, CT).
- 20 We may ask you for evidence of your identity e.g. copy of a driving licence or passport. This is so that we have a record of who is paying the fees for anti-money laundering purposes (LI).
- 21 We may hold information about bankruptcy petitions and statutory demands, where relevant (LI, CT).
- 22 We may search the files of any licensed credit reference agency in order to verify your identity. This also allows us to assess your application for the award of a bursary or for credit in contemplation of an agreement for the deferment of fees. The credit reference agency will keep a record of that search and details about your application. This record will be seen by other organisations which make searches about you (LI, CT).

23 We may share your personal data with debt recovery suppliers if you do not pay any fees or other sums owed to the School (LI, CT).

24 We may obtain information about you from publicly available sources, such as Companies House and Zoopla, to verify your identity or other personal details and assess your ability to pay School fees (LI, CT).

25 If you apply to the School for a bursary, we will use the information that you provide to assess your application (LI, CT).

#### Sharing personal data with others

26 We will share information with local authorities, the Independent Schools Inspectorate and the Department for Education. For example, where we have any safeguarding concerns or to comply with our legal obligations. These organisations may also provide information to us for these purposes (LI, LO, PI).

27 On occasion, we may need to share your personal data with the police, or other law enforcement authorities, for the prevention or detection of crime or the apprehension or prosecution of offenders. We will only do this in specific circumstances to assist the police with their investigations (LI, CT, LO, PI).

28 We may need to share information about you with the Health and Safety Executive (a government organisation) if there is a health and safety issue at the School (LI, LO, PI).

29 In certain circumstances, we may also need to share information with our legal advisers for the purpose of obtaining legal advice (LI, LO, PI).

30 Occasionally we may use consultants, experts and other advisors to assist the School in fulfilling its obligations and to help run the School properly (e.g. our accountants). We will share your personal data with them if this is relevant to their work (LI, CT, PI).

31 We may share information about you with (and get information from) health authorities, providers of healthcare services and healthcare professionals, for example, in relation to pupil immunisations. (LI, PI).

32 If your child is not a British or Irish national, we have to make sure that your child has the right to study in the UK. Sometimes the government will ask us to provide information as part of our reporting requirements. Additionally, if your child is sponsored by us under a Child Student visa we will have to provide information about them to UK Visas and Immigration to comply with our duties as their sponsor (LI, CT, LO, PI).

33 The School is a charity which means that in exceptional circumstances we may need to share your personal data with the Charity Commission e.g. in the event of a serious incident (LI, LO, PI).

34 We may share some information with our insurance company to make sure that we have the insurance cover that we need or in connection with an actual or possible claim (LI, PI).

35 If the School is dealing with a request for information, query, complaint or grievance (e.g. from another parent), we may need to share your personal data with

other parties if it is relevant and appropriate to do so. For example, with the appropriate staff, pupil or parent involved and governors (LI, PI).

36 If you have unpaid fees we may share information about this with other schools or educational establishments to which you propose to send your child (LI).

37 If your child leaves us to attend another school we may provide that school with information about you. For example, details of family circumstances if there have been any safeguarding incidents (LI, LO, PI).

38 We may share information about you with others in your family, such as another parent or step-parent. For example, where this is part of our obligation to take care of your child, as part of our wider legal and regulatory obligations, or in connection with school fees (LI, PI).

39 We may need to share information if there is an emergency, for example, if you are hurt whilst on School premises (LI, VI).

40 We will share information about you with the Foundation]. For example, financial information or details of family circumstances (LI, PI).

41 If you have appointed an agent to act on your behalf, we may share information with them. For example, we may send letters to them so that they can pass these on to you (LI).

42 If you have appointed an educational guardian (and/or there are homestay arrangements) for your child, we may share your personal data with them (LI).

43 If your child has an Education and Health Care Plan (EHCP), we will share information with and obtain information from the local authority about you (LO, PI).

44 If ever in the future, we are considering restructuring the charity which operates the School, we may share your personal data with the other parties involved and with the relevant professional advisors (LI).

45 Some of the records the School keeps and which contain your personal data may be used by the School (or by someone else such as the government) to check that the School has been a good school (LI, PI).

46 We will share your personal data with the governors of the School if it is something they should be aware of, or the information will enable them to fulfil their role as a governor. For example, if there is a concern involving you or your child or something which affects the running of the School (LI, PI).

As you will see from the above, in some cases we will rely on more than one lawful basis for a particular use of your information.