WETHERBY PREPARATORY SCHOOL
MARYLEBONE

inspired

Wetherby Preparatory School
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Privacy Notice for Boys and Parents

Policy reviewed by:	Lloyd Jackson
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Reviewer's signature:	
Head's signature:	

Circulation: This policy is addressed to all members of staff and volunteers and is available to parents on request. It applies wherever staff or volunteers are working with the boys.

Please note: 'School' refers to Wetherby Preparatory School and 'parents' refers to parents, guardians and carers.

1. Who we are and the purpose of this Privacy Notice

We are Wetherby Preparatory School (the "**School**"), with address Bryanston Square, London W1H 2EA. The School is a member of the Inspired Education Group (the "**Group**").

This **Privacy Notice** is intended to provide information about how the School will collect, use and hold (or "**process**") personal data about individuals including: current, past and prospective boys; and their parents, carers or guardians (referred to in this policy as "**parents**"). Please note that the School has a separate Privacy Notice applicable to its employees and other staff.

This Privacy Notice applies alongside any other information the School may provide about a particular use of personal data. This Privacy Notice also applies in addition to the School's other relevant terms and conditions and policies, including:

- any contract between the School and the parents of boys;
- the School's policy on taking, storing and using images of the boys;
- the School's CCTV and/or biometrics policy;
- the School's and/or Group's Data Retention Policy;
- The School's Data Protection Rights Policy;
- The School's Cookies Policy;
- the School's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the School's or the Group's (as applicable) IT policies.

This Privacy Notice may be updated from time to time to ensure continued compliance with applicable laws and to reflect best practice.

2. What information is collected about the boys and parents

The types of personal data the School may process include:

- name and contact information such as the address, email and telephone number of the boy, parent, guardian, fee payer and next of kin;
- boy's date and country of birth, ethnicity, gender and country of domicile, passport number or national identity card details and visa status and other immigration status information;
- car details (about those who use our car parking facilities);
- information relating to a boy's education history such as previous schools, courses completed, dates of study, attendance, disciplinary and safeguarding records and examination results;
- boys' academic data including examination and assessment results, reports and curriculum timetables;
- information about boys' health and medical conditions, special educational needs and family circumstances / living arrangements;
- safeguarding information;
- correspondence with and concerning boys and parents (past and present);
- references given or received from previous schools or education establishments, and relevant information provided by previous educational establishments and/or other professionals or organisations working with the boys;
- information relating to fees such as parents' banking details and other financial information (including any source of funds and/or anti-money laundering information we are required to

collect by law), and pupil scholarships and bursaries;
- information which may assist with the provision of appropriate medical and pastoral care of the boy such as any disability, medical, or dietary issues. This may also include information about family or personal circumstances where this is relevant to the assessment of suitability to receive a bursary; and
- images of the boys (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).

Please note that the School will routinely anonymise and/or aggregate personal data, such that it is no longer considered "personal data" under applicable data protection law, or otherwise apply appropriate data minimisation procedures such as pseudonymisation. We use this data set for evaluation and analytical purposes and we may also share it with third parties for these purposes.

3. How the School collects information

Generally, the School receives personal data from the individual directly (including, in the case of boys, from their parents). However, in some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities, or third party service providers who credit and identity check parents and their source of funds); or collected from publicly available resources.

With the above in mind, the following are the primary ways the School collects personal data about boys and parents:

- information provided during the admission process and when a boy is attending the School;
- information generated during the course of studies and time at the School (e.g. attendance, academic achievement, behaviour or safeguarding information);
- information received from previous places of education (whether part of the Group or not);
- information received from statutory agencies;
- information provided by third parties in relation to a boy's right to study at the School or in relation to funding (for example for bursaries or scholarships); and
- information from access to and use of the School's website, or other online educational tools and software including the Group's Global Study Platform.

4. Why the School needs to process personal data

The primary use of the personal data we collect is to support the learning and development of the boys during their time at the School, whilst ensuring the wellbeing and safeguarding of the boys. In order to do so, the School needs to process a wide range of personal data about our community as part of our daily operations.

Some of this activity the School will need to carry out is because it is **necessary for the performance of a contract** with our staff, or parents of our boys.

Other uses of personal data will be made in accordance with the School's legitimate interests, or the legitimate interests of others, provided that these are not outweighed by the impact on individuals. The School expects that the following uses will fall within that category of our (or our community's) "**legitimate interests**":

- For the purposes of pupil selection, to confirm the identity of prospective boys and their parents, and retain a record (if appropriate) for the purposes of future applications or openings;
- To carry out credit, identity and source of funds checks, whether with previous schools and/or third party sources or service providers, including for the purposes of verifying that parents are not subject to (or within the purview of) sanctions;
- To provide education services (including musical education, physical training or spiritual development, career services, and extra-curricular activities to boys), and monitoring boys' progress and educational needs, including where such services are provided remotely / via apps or other technology platforms (either temporarily or permanently), including where assisted by AI (in accordance with the School's AI Policy);
- To provide school transport services, catering or specialised care;
- To report to and liaise with parents about their child's progress, welfare and development including by way of regular reports and parents' evenings;
- To organise and manage meetings, events and social engagements for boys and parents;
- To maintain relationships with alumni and the School community, including by 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 promote diversity and equality;
- To monitor and evaluate the performance and effectiveness of the School, and to maintain and improve the academic, corporate, financial, estate and human resource management of the School;
- 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 and current boys, including relating to outstanding fees or payment history, to/from any educational institution that the boy attended or where it is proposed they attend; and to provide references to potential employers of past boys;
- For debt collection purposes;
- To enable boys to take part in national or other assessments, and to publish the results of public examinations or other achievements of boys of the School;
- To safeguard boys' health and 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 Acceptable Use Policy;
- To make use of images (including photographs and videos) of boys for administrative and day to day internal uses such as newsletters and year books, 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;
- For the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities;
- For regulatory record keeping / compliance purposes in respect of immigration requirements, as an employer and/or visa sponsor;
- To carry out or cooperate with any School or external complaints, disciplinary or investigation process;
- To contact parents or boys to promote the Group's services on matters such as openings on waiting lists at sister schools, opportunities within the Parent Teacher Associations or friends of

the School, or for Alumni events and activities;
- To promote the School to prospective parents and boys; and
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School;

The School may also process your personal data for our compliance with our **legal obligations**. In this respect, we may use your personal data for the following:
- To meet our compliance and regulatory obligations, including in order to comply with any requirement of any applicable statute, regulation or regulatory rule, such as compliance with anti-money laundering laws and safeguarding requirements;
- For the prevention, detection and investigation of crime;
- To assist with investigations, including criminal investigations carried out by the police and other competent authorities; and
- To administer and maintain such records as may be required by applicable laws and regulations from time to time.

We may also process your personal data for **additional reasons** where:

- It is necessary to protect the vital interests of a boy or another person;
- It is necessary for the establishment, exercise or defence of legal claims (for example, to protect and defend the School's rights, property, or those of any affiliates, including the Group); or
- We have the consent of the data subject to do so (for example, we seek parental and/or pupil consent for certain external marketing uses of the boys' images).

In addition, the School will on occasion need to process more 'sensitive' types of data (sometimes referred to as **special category personal data)** (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information in accordance with rights or duties imposed on us by law, including as regards safeguarding, or from time to time by explicit consent where required. These reasons will include:

- To safeguard boys' 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 health / medical condition or other relevant information where it is in the individual's interests to do so: for example for emergency medical care, to arrange the assessment and diagnosis of a boy's health and medical conditions and special educational needs, 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 comply with public health requirements;
- To provide educational services in the context of making reasonable adjustments for a boy's disability and/or any special educational needs of a boy;
- To run any of the School's systems that operate on biometric data, such as for security and other forms of pupil identification (lockers, lunch etc.);
- As part of any School or external complaints, disciplinary or investigation process that involves such data, for example if there are SEND, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection, diversity monitoring, attendance / absence reporting, health and safety and immigration / visa sponsorship compliance) and to comply with its legal obligations and duties of care.

5. Who personal data may be shared with

Processing by third parties. 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). However, we use data processors who are third parties who assist us with some functions, including accounting, IT, cloud storage / records management, monitoring, mailing, and to support our delivery of the curriculum and associated education services to the boys (including via AI systems). This type of external data processing is subject to contractual assurances that personal data will be kept securely and used only in accordance with the School's specific directions.

Data sharing. The School will from time to time, need to share personal information relating to its community of boys and parents with third parties, such as:

- External health professionals such as educational psychologists and speech therapists;
- Appropriate contractors and third-party suppliers, such as visiting music teachers;
- Government and local authorities, statutory agencies and/or regulatory bodies;
- Bursary and scholarship funding organisations;
- Examination boards /assessment centres;
- The Group, other entities within the Group, or other schools in the Group;
- Exit/destination schools (including in the form of confidential references);
- Professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- Third parties and their advisers in the event of a possible or actual sale, merger or other restructuring or financing of the School / Group; and
- Courts or debt collections agencies in the event of non-payment of fees.

International data transfers. Where data is transferred internationally, we will put in place appropriate measures to ensure the adequate protection of your personal data when it is transferred to countries that do not provide the same level of protection for personal data, and ensure that international transfers are carried out in accordance with applicable data protection laws.

Marketing activity. The School may use parents' email addresses to create lookalike audiences in Social Media Platforms for marketing purposes. This involves using email addresses in an encrypted format to match users on the platform and to create a Custom Audience or Lookalike Audience. Emails are not shared in a readable format (i.e. the data is pseudonymised) and will be deleted by the platform after the matching process. The primary purpose of using lookalike audiences is to support our marketing activities by reaching potential parents who may be interested in our educational services. This is done by leveraging information such as demographics, interests and behaviours for matching purposes. We process your personal data for lookalike audiences based on our legitimate interests. We have assessed that this processing is necessary for our marketing activities and does not override your rights and freedoms. You have the right to object to this use of your data at any time. You can do this by contacting the School directly or via Facebook using **this link**.

6. How long the School keeps personal data

The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason, including to meet regulatory and legal requirements or for

archiving purposes. For further information on data retention, please see the School's Data Retention Policy which is available upon request. We may retain certain academic data for longer periods for archiving, research and statistical purposes. Where we do so, we will put in place suitable data minimisation procedures. This will include removing the data from day-to-day processing and putting in place access restrictions.

7. Keeping in touch and supporting the School

On leaving the School, boys will also become members of the Alumni community. Where applicable some personal data from pupil records will be transferred to the Alumni database. This may include items such as contact details, sporting interests, and academic details. 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.

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).

8. Your personal data rights

You have a number of rights in relation to your personal data. These are:

- **The right of access**: You may request a copy of the personal data that the School holds about you.
- **The right to rectification**: You may ask the School to correct any information we hold about you if it is incorrect.
- **The right to erasure**: You may ask the School (in certain circumstances) to delete information that the School holds on you.
- **The right to restrict processing**: You may ask the School to restrict our data processing activities (and, where the School's processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal).
- **The right to data portability**: You may ask the School (in certain circumstances) to transfer your personal data to another data controller in a format that makes it easy for them to use.
- **The right to object**: You may object, on grounds relating to your particular situation, to any of the School's particular processing activities where you feel this has a disproportionate impact on your rights.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. The School will endeavour to respond to any such requests as soon as reasonably practicable and in any event within legal time limits. To exercise any of these rights, or if you have any data protection related concerns, please contact: **dpo@inspirededu.com**.

You also have the right to complain to a Data Protection Authority if you believe that your personal information has been collected or used in breach of relevant data protection laws. This will typically be the Data Protection Authority in the country in which you are located.