



**Queen's College, London &  
Queen's College Preparatory School**

*Parent Privacy Notice*

*Due for review Summer Term 2025*

## **Introduction**

This notice is to help you understand **how** and **why** we collect your personal data and **what** we do with that information. It also explains the decisions that you can make about your own information. It refers to all parents of current, former and prospective pupils at Queen's College, London ( "Queen's"), which encompasses Queen's College ("the College") in Harley Street and Queen's College Preparatory School ("QCPS") in Portland Place.

Please note, this privacy notice refers specifically to "parents" but is intended to cover all individuals with overall responsibility for pupils.

For the purposes of data protection law, the controller of your personal data is Queen's. The Bursar is the individual with overall responsibility for ensuring compliance with data protection law. If you have any questions or concerns about the way your personal data is being used by Queen's, the Bursar can be contacted via 0207 291 7000.

## **What personal data do we collect in relation to you?**

Personal data is information that relates to you, from which you can be directly or indirectly identified. In particular, we collect the following categories of personal data:

- Your name and contact details (including telephone number, email address, postal address, marital status, and identification documents)
- Financial information (including bank account details, details of fees paid and payable, and eligibility for financial assistance)
- Information relating to your relationship to your children, including any court orders that may be in place relating to access or contact with your children
- CCTV footage and other images captured when you visit the College or QCPS

Certain types of information are more sensitive than others, including "special category personal data" and information relating to criminal convictions and offences. The special categories of personal data include personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or orientation.

We routinely collect information about your health (for example, access requirements if you have a disability), religion (for example, if you have dietary requirements) and nationality (this will help us understand your child's requirements better, especially if English is not their first language).

We do not routinely collect information relating to criminal convictions and offences unless it is really necessary. Please see below for further information about how we process criminal offence data.

## **Where do we get your personal data from?**

We will collect your personal data directly from you, for example when you contact Queen's or fill out an application form.

We will also obtain your personal data from other sources, which may include the local authority, your children's previous school(s), your children (and other family members), staff within Queen's (such as teachers), and other professionals (such as doctors, social workers, the courts, the police or legal advisors).

### **How and why does Queen's collect and use personal data?**

We set out below examples of the different ways in which we use personal data and where this personal data comes from.

1. Queen's primary reason for using your personal data is to provide educational services to your child.
2. 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.
3. We will need information about any court orders or criminal petitions which relate to you. This is so that we can safeguard the welfare and wellbeing of your child and the other pupils at the College and QCPS.
4. We use CCTV to make sure Queen's sites are safe. Images captured of you via CCTV will be your personal data. CCTV is not used in private areas such as toilets.
5. If there is a complaint or grievance made to Queen's which involves you then we will use your information in connection with that complaint or grievance.
6. Where appropriate, Queen's will have information about your religious beliefs and practices. For example, if you do not eat certain foods.
7. We may take photographs or videos of you at school events to use on social media and on Queen's two websites. This is to show prospective parents and pupils what we do here and to advertise Queen's. We may continue to use these photographs and videos after your child has left Queen's.
8. We will send you information to keep you up to date with what is happening at Queen's. For example, by sending you information about events and activities taking place (including fundraising events) and the newsletters.
9. We will keep details of your address when your child leaves Queen's so we can send you the College magazine "Queen's Today" and find out how your child is progressing. We may also pass your details onto the alumnae association. Further information on the alumnae association can be found here:  
<http://www.qcl.org.uk/alumnae/alumnae-welcome.php>
10. We may use information about you if we need this for historical research purposes or for statistical purposes.

11. We may use your information when ensuring network and information security. For example, our anti-virus software might scan files containing information about you.

#### Financial information

12. We will process financial information about you in relation to the payment of fees. In some cases we get information about you from third parties such as credit reference agencies or from your child's previous school(s).
13. We will hold information about bankruptcy petitions and statutory demands.
14. 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 that make searches about you.
15. We may share your information with debt recovery suppliers if you do not pay school fees owed to Queen's.
16. We use a third party organisation to assist us with our bursary application process. If you apply for a bursary we will share information about you with the third party so that they can assess your application.
17. *As a fundraising organisation, we undertake in-house research and from time to time engage specialist researchers gather information about you from publicly available sources, for example, Companies House, the Electoral Register, company websites, social networks such as LinkedIn, political and property registers and news archives. We may also carry out wealth screening to fast track the research using our trusted third party partners. You will always have the right to opt out of this processing. We also use publicly available sources to carry out due diligence on donors in line with the charity's Gift Acceptance Policy and to meet money laundering regulations.*

Failure to supply information may result in a refusal of an award or credit.

#### **Sharing personal data with third parties**

We will never share your personal data with anyone outside Queen's without your consent unless the law says we can or should. Examples of who we may need to share your personal data with include:

1. In accordance with our legal obligations, 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.
2. On occasion, we may need to share your information with the police for the prevention and investigation of crime and the prosecution of offenders. We will only do this in specific circumstances to assist the police with their investigations.

3. 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 Queen's.
4. In certain circumstances, we may also need to share information with our legal advisers for the purpose of obtaining legal advice.
5. Occasionally we may use consultants, experts and other advisors (e.g. our accountants) to assist Queen's College, London in fulfilling its obligations and to help run Queen's properly. We will share your information with them if this is relevant to their work.
6. If your child is not of British nationality 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.
7. Queen's College, London is a charity which means that in exceptional circumstances we may need to share your information with the Charity Commission e.g. in the event of a serious incident.
8. We may share information about you with our insurance company, for example, where there is a serious incident at Queen's.
9. If you have unpaid fees while your child is at the College or QCPS we may share information about this with other schools or educational establishments to which you intend to send your child.
10. If your child leaves us to attend another school we may need to provide that school with information about you. For example, details of family circumstances if there have been any safeguarding incidents.
11. 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.
12. We may need to share information if there is an emergency, for example, if you are hurt whilst on Queen's premises.
13. We sometimes use contractors to handle personal data on our behalf. The following are examples:
  - IT consultants who might access information about you when checking the security of our IT network; and
  - we use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on either of Queen's sites.

### **Consequence of failure to provide us with your personal data**

Some of the information we collect from you is required by law or under contract. If you fail to provide certain information when requested, we may not be able to perform our obligations under the contract we have entered into with you. We may also be prevented from complying with our legal obligations (such as to ensure the welfare of your child and

their classmates).

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

This section contains information about the legal bases that we are relying on when handling your information as described above.

### Legitimate interests

This means that Queen's College, London is using your information when this is necessary for Queen's legitimate interests, except when your interests and fundamental rights override our legitimate interests.

Specifically, Queen's has a legitimate interest in:

- providing educational services to your child and to other children;
- safeguarding and promoting the welfare of your child, other children and our employees;
- promoting the objects and interests of Queen's. This includes fundraising and using photographs of you at our school events in promotional material. It also includes making sure that we are able to enforce our rights against you, for example, so that we can contact you if unpaid school fees are due;
- keeping Queen's buildings safe;
- using your information in connection with legal disputes. For example, if you or your child bring a claim against Queen's;
- protecting Queen's reputation;
- facilitating the efficient operation of Queen's; and
- ensuring that all relevant legal obligations of Queen's are complied with (for example, in relation to inspections).

In addition your personal data may be processed for the legitimate interests of others. For example, another school will have a legitimate interest in knowing if you have not paid fees that are due to us.

### Necessary for contract

We will need to use your information in order to perform our obligations under our contract with you and for you to perform your obligations as well. For example, we need your name and contact details so that we can update you on your child's progress and so that we can contact you if there is a concern.

### Legal obligation

Where Queen's needs to use your information in order to comply with a legal obligation, for example to report a concern to Children's Services. We may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

### Vital interests

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

### Performance of a task carried out in the public interest (or carrying out public tasks)

The following are examples of when we use your information to perform tasks in the public interest:

- providing your child with an education;
- safeguarding and promoting your welfare, your child's welfare and the welfare of other children;
- facilitating the efficient operation of Queen's College, London; and
- ensuring that we comply with all of our legal obligations.

Queen's College, London must also comply with an additional condition where it processes special categories of personal data. personal data

### Substantial public interest

Queen's is also allowed to use special categories of personal data where doing so is necessary in the substantial public interest. For example, where it is necessary for safeguarding or child protection reasons.

### Vital interests

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (e.g. if you or they are seriously hurt).

### Legal claims

We are allowed to use your information if this is necessary in relation to legal claims. For example, this allows us to share information with our legal advisors and insurers.

## **Criminal offence information**

We may only use information relating to criminal convictions and offences where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations.

Less commonly, we may use information relating to criminal convictions and offences where it is necessary in relation to legal claims, where it is necessary to protect our pupils and you are not capable of giving your consent, or where you have already made the information public.

## **Multiple legal grounds**

The ground that we will rely on for a particular purpose may vary depending on the circumstances. For example, if we decide to tell the local authority something about a

parent for safeguarding reasons, sometimes this will be because we have a legal obligation to do so but on other occasions we may tell the local authority because we are worried about the child even if we don't have a legal obligation to report something (in which case we would be relying on legitimate interests and substantial public interest).

### **Consent**

We may ask for your consent to use your information in limited circumstances. For example, we rely on consent to take photographs for use in marketing material or on social media, and to send out marketing information such as newsletters and fundraising material. If we ask for your consent to use your personal data you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. Please speak to the Bursar if you would like to withdraw any consent given.

### **Sending information to other countries**

In certain circumstances, we may send your information to countries which do not have the same level of protection for personal data as there is in the UK. For example, we may store your information on cloud computer storage based overseas.

personal data Where we do transfer your information outside the UK, we will ensure it is protected and handled in line with data protection law. For example, if we can we will only transfer your personal data to countries that provide the same or a higher level of protection as the UK. If we cannot do this, we will take steps to protect your personal data with one of the other measures available under the law (such as through contracts).

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

### **For how long do we keep your personal data?**

We only keep your information for as long as we need to in order to educate and look after your child. We will keep some information after your child has left Queen's, for example, so that we can find out what happened if you make a complaint.

In exceptional circumstances we may keep your information for a longer time than usual but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

Please see our Data Protection Policy for more detailed information. This is available on application from the Bursar.

### **What decisions can you make about your personal data?**

Data protection legislation gives you a number of rights regarding your information. These are:



- **Access:** you can also ask what information we hold about you and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to.
- **Rectification:** if information is incorrect you can ask us to correct it.
- **Erasure:** you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your information to you or to a third party in a format that can be read by computer. This applies where (a) the information has been provided by you; (b) the basis that we are relying on to process your information is consent or contract (please see "Our legal grounds for using your information" above); and (c) the information is being processed by us on a computer.
- **Restriction:** our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.
- **Objection:** you may object to us using your information where:
  - a. we are using it for direct marketing purposes (e.g. to send you a newsletter or the College magazine "Queen's Today");
  - b. we are relying on either the legitimate interests or performance of a task carried out in the public interest legal ground to use it - please see the section "Our legal grounds for using your information" above; and
  - c. we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of school events that may feature you for historical reasons.

The Bursar can give you more information about your data protection rights.

### **Further information and guidance**

This privacy notice does not, and is not intended to, give you any rights which you did not already have. For example, it does not give you any additional contractual rights.

Please speak to the Bursar if:

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

If you consider that we have not acted properly when using your personal data you have the right to make a complaint to the Information Commissioner's Office via

<https://ico.org.uk/make-a-complaint/>

### **Changes to this privacy notice**

This privacy notice was published on 1<sup>st</sup> September 2024. This privacy notice may be updated from time to time. When we do this, we will publish the new privacy notice on our website , if the changes are significant, we will contact you directly.