PRIVACY NOTICE

WHO WE ARE

We are The New Model School Company Limited, Company a company registered in England and Wales. Our registration number is 4892739 and our registered office is 62A Crownhill Road, London NW10 4EB,

The New Model School Limited (referred to as NMS throughout this notice) manages Maple Walk School (referred to throughout this notice as "the School") whose premises are at 62A Crownhill Road, London, NW10 4EB.

Maple Walk School is an independent school, educating children between the ages of 4-11 years old.

WHAT THIS PRIVACY NOTICE IS FOR

This Privacy Notice is intended to provide information about how NMS and the School acting on behalf of NMS will collect, use and hold (or "process") personal data about individuals including: current, past and prospective pupils; and their parents, carers or guardians (referred to in this policy as "parents").

Collectively, we refer to these individuals in the Privacy Notice as NMS and the School's community.

Please note that there is a separate Data Protection policy and Privacy Notice applicable to or employees and other staff.

This information is provided because data protection law gives individuals rights to understand how their data is used. Staff, parents and pupils are all encouraged to read this Privacy Notice and understand NMS and the School's obligations to its entire community. However, NMS also has a separate **Staff Privacy Notice** and **Data Protection and Handling policy** applicable to its employees and other staff.

This Privacy Notice applies alongside any other information NMS and 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 NMS and the School's other relevant terms and conditions and policies, including:

- any contract between NMS and its staff or the parents of pupils;
- any policies or notices applicable to staff concerning the handling of personal data
- the School's policy on **Taking, Storing and using Images of children**;
- the School's **CCTV policy**
- the School's **Child Protection and Safeguarding** and **Health and Safety** related policies, including as to how concerns or incidents are recorded; and
- NMS and the School's IT policies, including its **Online Safety policy**, relevant sections in the **Staff Code of Conduct policy**, **Acceptable Use of IT and Remote Working policy** and **Bring Your Own Device policy**.

Anyone who works for, or acts on behalf of NMS and the School (including staff, volunteers, directors, advisors and service providers) should also be aware of and comply with this Privacy Notice.

RESPONSIBILITY FOR DATA PROTECTION

The Chief Executive Officer of the New Model School Company will act as NMS's Privacy and Compliance Officer. Who will deal with all your requests and enquiries concerning NMS and 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 policy and data protection law. You can contact the Privacy and Compliance Officer at deborah.livsey@newmodelschool.co.uk

WHY NMS AND THE SCHOOL NEED TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to staff, pupils and parents, NMS and the School needs to process a wide range of personal data about our community as part of our daily operations.

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

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

NMS and the School expects that the following uses will fall within that category of our (or its community's) "**legitimate interests**":

- For the purposes of pupil selection (and to confirm the identity of prospective pupils 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 parents are not subject to (or within the purview of) sanctions.
- To provide education services, (including musical education, physical training and extra-curricular activities to pupils), and monitoring pupils' progress and educational needs, including where such services are provided remotely (either temporarily or permanently)
- To report to and liaise with parents about their child's progress, welfare and development including by way of regular reports and parents' evenings.
- Maintaining relationships with alumni and the School community, including direct marketing or fundraising activity.
- To organise and manage meetings, events and social engagements for pupils and parents;
- To maintain relationships with alumni and the School community, including by fund raising activity.
- 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 and current 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.
- To enable pupils to take part in external and internal assessments, and to publish the achievements of pupils of the School;
- To safeguard pupils' health and welfare and provide appropriate pastoral care (including following the requirements and recommendations of the government's guidance on *Keeping Children Safe in Education* or "KCSiE";
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's **Online Safety policy** and **Acceptable Use of IT policy**
- To make use of photographic images of pupils 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**;
- 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 authorties.
- For regulatory record keeping/compliance purposes in respect of immigration requirements as an employer.
- To carry out or cooperate with any School or external complaints, disciplinary or investigation process;
- To promote the School to prospective parents and pupils; and
- Where otherwise reasonably necessary for NMS and the School's purposes, including to obtain appropriate professional advice and insurance for the School.

In addition, NMS and the School will on occasion need to process **special category personal data** (for example concerning health,ethnicity, religion or sexual life)) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on them by law, including as regards safeguarding or from time to time by explicit consent where required.

These reasons will 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 or other relevant information where it is in the pupils or individual's interests to do so: for example for emergency medical care, to arrange the assessment and diagnosis of a pupil's helath 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 allergy, dietary or medical needs;
- To comply with public health requirements
- To provide educational services in the context of making reasonable adjustments for a pupil's disability and/or special educational needs of a pupil;

- 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, health and safety and immigration) and to comply with our legal obligations and duties of care.

TYPES OF PERSONAL DATA PROCESSED BY NMS AND 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 (or others) who pay fees to NMS, and any source of funds and/or anti-money laundering information we are required to collect by law.
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- nationality and other immigration status information (eg. right to enter, live and study in the United Kingdom), including copies of passport information.
- information about pupils' health and medical conditions, special educational needs and family circumstances/living arrangements.
- references given or received by the School about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- correspondence with and concerning pupils and parents past, present and;
- images and video content of pupils (and occasionally other individuals) engaging in school activities, including content captured by the School's CCTV system (in accordance with the School's policy on **Taking, Storing and Using Images of Children**);

HOW NMS AND THE SCHOOL COLLECTS DATA

Generally, NMS and the School receives personal data from the individual directly (including, in the case of pupils, from their parents). This may be via a form, 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, or third party service providers who credit and identity check parents and their source of funds) or collected from publicly available resources

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

<u>Processing by third parties</u>

For the most part, personal data collected by NMS and the School will remain within the NMS Head office and the School, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). However, some functions are outsourced including for example IT support and cloud storage provision, and email and internet access monitoring. In accordance with data protection law, this type of external data processing is always subject to

contractual assurances that personal data will be kept securely and used only in accordance with the NMS and School's specific directions.

Data sharing

Occasionally, NMS and the School – including its directors and advisors– will need to share personal information relating to its community of pupils and parents with third parties, such as:

- The Friends of Maple Walk (the School's parents association)
- appropriate contractors, such as visiting music teachers or external investigators and consultants.
- professional advisers (e.g. lawyers, insurers, PR advisers and accountants);
- examination boards;
- Stage 3 complaints panels, which will include independent panel members; and
- government authorities (e.g. HMRC, DfE, CAFCASS, police, Home office, a relevant public health /NHS body and/or a relevant local authority) and/or appropriate regulatory bodies e.g. the **Teaching Regulation Agency**, the **Independent Schools Inspectorate**,
- If you are a parent and a member of the Friends of Maple Walk the School may share your contact details with the Trustees and class representatives. The Friends of Maple Walk is a separate data controller and NMS and the School are not responsible for their processing of personal data.

ACCESS TO AND SHARING OF SENSITIVE DATA

Particularly strict rules of access apply in the context of "special category" data, most notably:

- medical records; and
- pastoral or safeguarding files.

Medical data

NMS and the School needs to process such information to comply with statutory duties and to keep pupils and others safe, but NMS and the School will ensure only authorised staff can access information on a need-to-know basis. However, information on drug reactions, major allergies and notable conditions will be available to all staff likely to have care of a pupil, particularly if the staff are required to administer medication or treatment.

This may include wider dissemination if needed for school trips or for catering purposes. Express consent will be sought where appropriate.

However, a certain amount of any 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.

Safeguarding data

The School is under duties imposed by law and statutory guidance (including **Keeping Children Safe in Education or KCSIE**) 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, low level concerns records kept about adults (which may include references to pupils or family members) and in some cases referrals to relevant authorities such as the LADO or Children's services, CAMHS or the police.

KCSIE also requires that, whenever a child leaves a school to join another school or college, his or her child protection file is promptly provided to the new organisation, along with any other information which the school's Designated Safeguarding Lead considers material to the ongoing care needs of any pupil. Where appropriate the School will consult with the parents as to how these needs are best served, but ultimately the decision as to what information to share with the new school is a safeguarding question that must be reserved for the School. The School will retain a copy in accordance with its retention policy for material related to safeguarding matters.

For further information about this, please view the School's **Child Protection and Safeguarding Policy**.

In addition, at class level the School maintains logs detailing behaviour, alleged bullying incidents, accidents and any other minor incidents noting where these have affected/are affecting any given child.

HOW LONG WE KEEP PERSONAL DATA

NMS and 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. Typically, the legal recommendation for how long to keep ordinary parent and pupil files is for 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.

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 Privacy and Compliance Officer based at New Model School Head Office. However, please bear in mind that we will often have lawful and necessary reasons to hold on to some personal data even following such a 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

NMS and the School will use the contact details of prospective parents, parents, alumni and other members of the School community to keep them updated about the activities of the School, or about alumni and parent events of interest, including sending updates and newsletters by email and by post. Unless the relevant individual objects, we 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 the Friends of Maple Walk
- Contact parents and/or alumni (including via the Friends of Maple Walk) by post and email in order to promote and raise funds for the School
- Collect information from publicly available sources about parents' , former pupils' occupation and activities, in order to maximise fund raising potential.
- Should you wish to limit or object to any such use, or would like further information about them, please contact the Privacy and Compliance Officer in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. 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

Individuals (both pupils and parents) have various rights under data protection law to access and understand their own personal data held and processed by NMS and the School, and in some cases ask for it to be erased or amended, or to have it transferred elsewhere, or for NMS and the School to stop processing it – but subject to certain exemptions and limitations.

NMS and the School 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 generally one month, but actually fulfilling more complex or multiple requests, e.g. those involving third party information, may take 1-2 months longer).

<u>Rights of access, etc.</u>

NMS and the School will be better able to respond quickly to smaller, targeted requests for information made during term time. If the request for information is manifestly excessive or similar to previous requests, NMS and the School may ask you to reconsider, or require a proportionate fee (but only where data protection law allows it and in accordance with relevant regulatory guidance).

If you consider that the personal data we hold on you is inaccurate, please let us know. However, NMS and the School will not necessarily delete or amend views, opinions, notes or records purely on the request of an individual who disputes the account, although we may keep a record of all parties' viewpoints.

<u>Requests that cannot be fulfilled</u>

You should be aware that UK GDPR rights (including the right of access) is limited to your own personal data, and certain data is exempt. 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 NMS, or documents prepared in connection with a legal action or where a duty of confidence is owed by a legal advisor).

The School is also not required to

- disclose any pupil examination scripts (or other information consisting solely of pupil test answers, potentially including in mock exam papers or other types of exams/tests used to assess performance- although markers' comments may still be disclosable if they constitute pupil personal data), or
- provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference held by the School that was (or will be) given for the for the purposes of the education, training, appointment 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 proportionate legitimate interest identified in this Privacy Notice. Generally, if NMS and the School still considers the processing of the personal data to be reasonably necessary, it is entitled to continue. All such requests will be considered on their own merits.

Requests by or on behalf of pupils

Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of NMS and the School, they have sufficient maturity to understand the request they are making (see section **Whose Rights?** below). A pupil of any age may ask a parent or other representative to make a subject access request on their 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. Requests not considered in the child's best interests may sometimes be refused.

However, notwithstanding the above, pupils of primary school age (under the age of twelve) are not 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. Slightly younger children may however be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

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 pupils without their consent.

Parents will in general receive educational and pastoral updates about their children, in accordance with the Parent Contract. Where parents are separated, NMS and 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 wish of the child, court orders or pastoral issues.

All information requests 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 NMS and 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: in the use of certain types of images of pupils. Please be aware however that NMS and 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, or because a purchase of goods, services or membership of an organisation such as the parents' association has been requested).

Whose rights?

The rights under data protection law belong to the individual to whom the data relates. However, NMS and 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 NMS and 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 pupil's age and understanding – to seek the pupil's consent, either alongside or in place of parental 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 contract, and all the circumstances.

In general, we will assume that pupils' 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 our 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, and to comply with the School's pupil contract attached to the **Online Safety Policy** and the **Behaviour policy**. Staff are under professional duties to do the same covered under the relevant **Data Protection and Handling policy**, **Staff Code of Conduct** and **Online Safety Policy**.

DATA ACCURACY AND SECURITY

NMS and 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 NMS or the School, 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 NMS and the School may need to process your data, and below for details of who you may contact if you disagree.

NMS and 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 NMS and School systems. All staff, directors and advisors will be made aware of this policy and their duties under data protection law and receive relevant training.

THIS POLICY

NMS 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

If you believe that NMS or the School has not complied with this Privacy Notice or acted otherwise than in accordance with data protection law, you should email deborah.livsey@newmodelschool.co.uk with details of your complaint. We will acknowledge your complaint within 30 days of receipt and will investigate and inform you of the outcome of your complaint without undue delay (keeping you informed of progress as necessary.

If you are not satisfied with the outcome of your complaint, or if you feel NMS and the School has not handled it appropriately, you have the right to complain to the Information Commissioner's Office (ICO) https://ico.org.uk/

Although the ICO recommends that steps are taken to resolve the matter before involving the regulator.

Mia Santa-Humfrey
Head teacher
September 2026

Review approved by Deborah Livsey CEO
The New Model School Company Limited
September 2026

Date of next review August 2027.