



## **PRIVACY POLICY**

**Glasgow Mena Trust**  
**83-85 Lister St. Glasgow G4 0BZ**

## 1 INTRODUCTION

1.1 We are committed to protecting and respecting your and your child's privacy. In this privacy notice, references to "**we**", "**us**", "**our**" is a reference to Glasgow Mena Cultural and Welfare Trust and Centre(s) under its operation.

1.2 This privacy notice sets out the basis on which any personal data we collect from you or your child, or that you provide to us, is handled by us. We also have a privacy policy for our pupils, this is available on our website.

1.3 Please read the following carefully to understand our views and practices regarding your and your child's personal data and how we treat it.

1.4 We comply with all applicable data protection laws and regulations ("**Data Protection Legislation**"), which may include the General Data Protection Regulation 2016/679 and the Data Protection Act 2018. The Data Protection Legislation continues to change in the UK, following the UK's exit from the European Union and we continue to update our practices in light of these changes. For the purposes of the Data Protection Legislation, we are the data controller.

1.5 If you are reading this privacy notice online, we recommend that you print and retain a copy for future reference.

1.6 Our Data Protection Policy (outlining how personal data is managed) and this privacy notice are closely linked and should be read in conjunction with the other.

## 2 INFORMATION WE COLLECT ABOUT YOU AND YOUR CHILD

### Information you give us

2.1 You may give us personal data about you or your child, in a number of ways; these include but are not limited to:

2.1.1 using, visiting or interacting with our website (such as filling out forms or registering on our website);

2.1.2 visiting our centre;

2.1.3 corresponding with us by phone, e-mail or post; and

2.1.4 sending information directly to us, for example when paying our fees, giving us medical records or information about your child's health, completing centre admission forms, signing our parent contract or providing information as requested by us and/or which is necessary from time to time.

2.2 The information you give us may include the following information about you and / or your child (as applicable):

## A. Personal Data

2.2.1 full name;

2.2.2 date of birth and year group;

2.2.3 contact details (including home address, personal and work e-mail address, and mobile (personal and work number), home and/or work phone number);

2.2.4 parent login information (i.e. username and password) for the website;

2.2.5 financial and credit card information;

2.2.6 photograph;

2.2.7 Previous and current education records, and achievements;

2.2.8 car registration number;

## B. Sensitive Personal Data

2.2.9 passport details, nationality and other information relating to immigration status to ensure your eligibility to work in the local region and/or to send your child(ren) to a centre in the local region;

2.2.10 health records (including special education needs, medical or physical conditions and/or accidents) to provide the necessary provisions and support;

2.2.11 (where appropriate) family circumstances (including your relation to the child and your marital status) in order to maintain the appropriate level of communication and service for each family member; and

2.2.12 race, religion and ethnicity for statistical purposes, and to comply with centre processes such as the Annual Government Census.

## **Technical information we collect about you when you visit our website**

2.3 With regard to each of your visits to our website we may automatically collect the following information:

2.3.1 technical information, including the Internet Protocol (IP) address used to connect your computer to the Internet, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform; and

2.3.2 information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our website (including date and time); pages you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our number.

2.4 Our website may contain links to and from the websites of our partner networks, advertisers, suppliers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### **Information we receive from other sources**

2.5 We may be working closely with third parties (including, for example, your child's previous or new centre(s), medical practitioners, photographers, local and public authorities, suppliers, education authorities, payment and delivery services, debt collectors, lawyers and credit reference agencies) and may receive information about you from them.

2.6 We may also use a third party to collect:

2.6.1 location data to track, for example, your child on our bus services; and

2.6.2 information relating to monitoring to monitor, for example, your child's usage of our centre-issued devices.

2.7 We may also use CCTV footage to ensure the centre is safe. The footage may capture images of data subjects which will not be disclosed other than to fulfil any legal obligations. We may receive information about you if you use any of the other websites our Group operates or the other services our Group provides.

## **3 USES MADE OF THE INFORMATION**

### **Information you give to us**

3.1 We will use the information you give to us to pursue the following legitimate interests:

3.1.1 to deliver educational services to your child;

3.1.2 to protect the welfare of your child, promote the objects and interest of our centres, ensure the most efficient management of the centres and ensure that the centres' legal obligations are adhered to;

3.1.3 to store this information on the centre's chosen management information system;

3.1.4 to use your child's photograph as part of a manual ID system on the centre management information system;

3.1.5 to manage any queries or disputes you or your child may have with us or that we have with you or your child;

3.1.6 to enforce our terms of use with you or any other contract we may have with you (including the parent contract);

3.1.7 to contact you in relation to your enquiry about a place at one of our centres, for example personal contact from the Admissions Team, sending a prospectus via post or digitally, or booking and confirming a visit;

3.1.8 where your child is attending our centres, to provide you with information about other similar services (for example, after centre clubs or open days) we offer as part of the education and overall development of your child at the centre;

3.1.9 once your child has left the centre, to keep you up to date with key centre news and upcoming events;

3.1.10 to send out surveys to you by email as part of our Voice of the Parent campaign which is our centre improvement tool; and

3.1.11 to comply with government and regulatory guidance and/or legislation.

3.2 In order to pursue the legitimate interests referred to in paragraphs 3.1.1, 3.1.3 and 3.1.10, our centres also rely on software applications and other technology to process personal data about you and your children. These include the centre's management information system, virtual learning environments (including the setting of tasks and homework), revision tools, parents evening booking systems, text and email messaging communications, assessments of pupils' progress, our group-wide billing system and co-ordination of centre trips. We also rely on third parties that deliver physical services such as caterers, photographers, and transport providers. The third parties we use to deliver these applications are carefully chosen and vetted by us to ensure that, among other things, your and your child's personal data is kept secure.

3.3 We will also use the information you give to us as is necessary to carry out our obligations arising from the contract (or potential contract) between you and us and to provide you with the information and services that you request from us. For example, we will provide education services to your child and will use personal data where necessary to deliver these services. We will also use your personal information to invoice you for our services pursuant to the contract between you and us. We will also require a certain amount of personal information about you and your child at the pre-contract enquiry and application stage.

3.4 In addition, we are required by law to do the following (which is not an exhaustive list):

3.4.1 keep an admissions and attendance register;

3.4.2 keep pupil files (including, where relevant, special education needs and child protection files);

3.4.3 keep a record of behaviour sanctions; and

3.4.4 provide an annual written report on pupil progress and attainment.

3.5 Inevitably, there will be an overlap between what we do that is necessary to (a) perform our contract with you, (b) carry out our legal obligations and (c) pursue a legitimate interest although we have tried our best to distinguish these as set out above. If you have any questions about these please contact our Data Protection Officer or Data Protection Co-ordinator (see paragraph 9).

3.6 When we hold sensitive personal data (see paragraph 2.2B), this means we must adopt higher standards of care to make sure this kind of data is safe and doesn't fall into the wrong hands. We may process sensitive personal data in the following circumstances:

3.6.1 in limited circumstances, with your explicit written consent;

3.6.2 where we need to carry out our legal obligations;

3.6.3 where it is needed in the public interest;

3.6.4 for safeguarding;

3.6.5 about you child's physical or mental health, or disability status, to ensure health and safety to provide appropriate adjustments, to monitor and manage sickness absence and to administer care; and

3.6.6 about your race or national or ethnic origin, to e.g. for dietary requirements.

### **Information we collect about you from our website**

3.7 We will use this information for the following legitimate interests:

3.7.1 to contact you if you have made an enquiry to one of our centres via our online enquiry form;

3.7.2 to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

3.7.3 to improve our website to ensure that content is presented in the most effective manner, and your online experience is as effective and appropriate as possible, for you and for your computer;

3.7.4 to allow you and your child to participate in interactive features of our service, for example virtual learning environments, when you choose to do so; and

3.7.5 as part of our efforts to keep our website safe and secure.

### **Information we receive from other sources**

3.8 We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for one of the purposes set out above (depending on the types of information we receive). For example, we may receive a court order relating to you which impacts on our use of your and your child's information to protect the welfare of the child.

3.9 Also, social services, health practitioners or public authorities may provide us with information (particularly sensitive personal data) about your child which may need to be added to the centre's child protection or special educational needs file. This kind of processing of sensitive personal data may be necessary (a) for the purposes of carrying out our obligations in the field of social security or social protection law, (b) for medical diagnosis or provision of health care and/or (c) to protect the vital interests of your child or another person taking into account the mental and physical capacity of your child.

3.10 In order to achieve the purposes described in paragraph 3.9, our centres may do the following:

3.10.1 keep a list of your child's allergies or medical requirements within the classroom or staffroom in case of emergency. It is necessary for the centre to have a list readily available to our staff so that we are able to look after your child promptly in the event of a medical emergency; and

3.10.2 rely on software applications and other technology to process medical information (such as allergies, accidents and injuries) about you and your children. For further information on the kind of technology we use, particularly in the context of processing sensitive personal data about your child, please contact our Data Protection Officer or Data Protection Co-ordinator.

### **When we disclose information**

3.11 In order to pursue one of the legitimate interests set out above, we may share your and your child's personal information with:

3.11.1 an authorised member of the Glasgow Mena Cultural and Welfare Trust,

3.11.2 local authorities, education authorities (for example, Education Scotland), social services or the police where we have reason to believe there are safeguarding concerns in respect of your child;

3.11.3 exam boards (for example, AQA, Cambridge Assessment, OCR, Pearson and WJEC) in order to successfully administer exams;

3.11.4 where your child is not British, we may have to provide information about you or your child to UK Visas and Immigration;

3.11.6 business partners, professional advisors, debt collector, suppliers and sub-contractors for the performance of any contract we enter into with them or you; and

3.11.7 credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

3.12 We may disclose your personal information to third parties if we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use the terms of the parents' contract (between us and you) and other agreements. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

### **Where we need to get your consent**

3.13 We will not market services to you (other than in accordance with paragraph 3.1.7 or 3.1.9 above) without your consent and you have the right to ask us not to use your contact details for marketing.

3.14 We will seek your permission (and your child's permission if they are 13 years or older) to post any photographs of them on any of our marketing materials (including our prospectus or website); you and your child may withdraw these permissions at any time should you wish. This is managed via the 'Use of Images' form and/or by informing the centre's Administration Team in writing.

3.15 You or your child do not have to give us details about your child's race, religion or ethnicity if you do not want to. If you do provide us with this information, we only use these details to assist us with the day-to-day running of the centre (for example, if your child's religion means that he or she has particular dietary requirements then we will of course be much better informed if we have this information to cater to your child's requirements) and for equal opportunities monitoring purposes.

3.16 Where you have given consent to the above, you can withdraw marketing consent at any time by contacting the centre.

## **4 TRANSMISSION OF PERSONAL INFORMATION OUTSIDE THE UK OR THE EEA**

4.1 The data that we process about you and your child may be transferred to, and stored at, a destination outside the UK or the European Economic Area ("EEA"). We try to limit this where possible but it may be necessary where, for example, one of our suppliers has a data centre outside the UK or the EEA. We will take all steps reasonably necessary to ensure that your and your child's data is treated securely and in accordance with this privacy notice and that the appropriate legal safeguards are in place prior to the transfer, for example ensuring that any contracts between us and the recipient of the information have standard data

protection clauses, or the country we are transferring the data to is deemed by the UK Government as an adequate country where they have appropriate legal and technical safeguards to protect your data in line with the UK GDPR.

## **5 YOUR RIGHTS**

5.1 Under the Data Protection Legislation, you and your child have the following rights:

**5.1.1 Right to correction.** You have the right to have inaccurate personal data about you or your child rectified.

**5.1.2 Right not to be Subject to Automated Decision Making or Profiling.** You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning the individual or similarly significantly affects the individual

**5.1.3 The right to erasure.** You have the right to request that we delete your and your child's personal data where: (a) the personal data are no longer necessary in relation to the purposes for which they were collected or processed; (b) you withdraw your consent to processing for which we previously obtained your consent; (c) you object to the processing and, as a result, we agree to cease that processing (please see paragraph 5.1.6 for more details); (d) the personal data has been unlawfully processed; and (e) we are required to erase the personal data in order to comply with the law.

**5.1.4 Right to restriction.** You have the right to obtain from us the restriction of processing where: (a) you contest the accuracy of the personal data we hold about you; (b) the personal data has been unlawfully processed; (c) we no longer need the personal data but they are required in limited circumstances; and (d) you object to the processing and, as a result, we agree to cease that processing (please see paragraph 6 for more details).

**5.1.5 Right to request transfer.** In certain circumstances, you have the right to receive personal data from us in a structured, commonly used and machine-readable format and the right to transmit it to a third-party organisation.

**5.1.6 Right to object.** You have the right to raise an objection to any of our processing in paragraphs 3.1 and 3.2. Please tell us if you object to any type of processing that we do and we will work with you to address any concerns you may have.

**5.1.7 Right to object to marketing.** If you do not want us to process your personal data for direct marketing, please tell us and we will ensure that we no longer do this.

**5.1.8 Right to complain to the ICO.** Whilst we would always prefer it if you approached us first about any complaints or queries you may have; you always have the right to lodge a complaint with the Information Commissioner's Office.

**5.1.9 Right to request access.** You have the right to access personal data we hold about you. We encourage you to contact the centre's Data Protection Co-ordinator and request our standard SAR form for you to complete in order to help us process your request.

## **6 HOW LONG WE KEEP PERSONAL INFORMATION**

6.1 We will not keep any personal data about you for any longer than is necessary for the purposes for which the personal data are processed.

6.2 As a general rule, we keep your child's education records until they reach 25 years of age at which point, we destroy the file. This is regardless of whether their file has been transferred to another centre, in the event that your child transfers centres.

6.3 We follow a personal data retention policy which determines how long we keep specific types of personal information for. For further information about the criteria we use to determine what periods we keep specific information, please contact our Data Protection Officer or Data Protection Co-ordinator (see paragraph 9).

## **7 COOKIES**

7.1 Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Notice which is made available on our website.

## **8 USE OF OUR WEBSITE**

8.1 Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone. Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our website; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **9 CONTACT US**

9.1 Questions, comments and requests regarding this privacy notice are welcomed and should be addressed to our Data Protection Officer emailing us directly.

## **10 CHANGES TO OUR PRIVACY NOTICE**

10.1 Any changes we make to this privacy notice in the future will be posted on our website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy notice.