

The Maria Montessori Training Organisation
trading as
The Maria Montessori Institute

Privacy Policy

The Maria Montessori Training Organisation (operating as the Maria Montessori Institute) collects and uses personal information about staff, students, parents, children and other individuals who come into contact with the Organisation. The information is gathered in order to enable it to provide training, education and other associated functions. In addition, there is a legal requirement to collect and use information to ensure that the school complies with its statutory obligations.

The Maria Montessori Institute is registered as a Data Controller with the Information Commissioner's Office (ICO) detailing the information held and its use. These details are then available on the ICO's website. The Maria Montessori Institute has a duty to issue a Privacy Notice to all staff, students and parents, this summarises the information held on individuals, why it is held and the other parties to whom it can be passed on.

This policy applies to our website, our use of emails and text messages for marketing purposes, and any other methods that we use for collecting information. It covers what we collect and why, what we do with the information and what we won't do with the information, and what rights you have.

What this Privacy Notice is For

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

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Staff, parents, children and students are all encouraged to read this Privacy Notice and understand the Institute's obligations to its entire community.

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

- any contract between the Institute and its staff or the parents of children or students;
- the Institute's policy on taking, storing and using images of children;
- the Institute's CCTV policy
- the Institute's retention of records policy;

- the Institute's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the Institute's IT policies, including its Acceptable Use policy, eSafety policy, Remote Working policy and Bring Your Own Device policy.

Anyone who works for, or acts on behalf of, the Institute (including staff, volunteers, governors and service providers) should also be aware of and comply with the Institute's data protection policy for staff, which also provides further information about how personal data about those individuals will be used.

The Maria Montessori Institute's Commitment to Privacy

The Maria Montessori Institute is committed to keeping the personal information that you share with us (on paper, over the telephone or via the internet) accurate, up to date and confidential.

Responsibility for Data Protection

The Institute has appointed the Bursar as Privacy and Compliance Officer who will deal with all your requests and enquiries concerning the Institute'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.

What Information do we collect?

We will only ever collect the information that we need, including data that will be useful to help us to improve our services. We collect two kinds of information:

- Non – personal information such as IP addresses (the location of the computer on the internet), pages accessed and files downloaded. This helps us to determine how many people use our website and how popular the pages are. It doesn't tell us anything about who you are or where you live. It simply allows us to monitor and improve our website. We also use cookies on our website. Please see our *cookies policy* for further information.
- Personal information – see below. This information will be used for school and course administration and for other normal purposes of an independent school and further education institution.

Personal data processed by the Institute

Personal data processed by the Institute includes contact details, assessment results, attendance information, special educational needs, and images of children and students engaging in Institute activities (and in relation to parents and/or guardians and students, may include financial information). The Institute may also process sensitive personal data such as ethnic group, religious beliefs and relevant medical information.

How we collect personal data

We will collect information about you and your child (if applying for a school place) at the time you apply for a place at the school or for a place on the Training courses or on events run by the Training arm of the Institute in order to facilitate the application process. Following an offer and acceptance of a place we may collect further information. To ensure that the data we hold about you and about children at our school we will from time to time request that you confirm and where necessary update the information that we hold. On occasion, we may request additional information if it is deemed necessary for administration or for the health, safety and welfare of our students and children.

Your personal data will usually be collected directly from you, but some may be passed to the Institute by third parties, for example references and medical reports required for Training course applications.

Why the Institute needs to process personal data

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

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

Other uses of personal data will be made in accordance with the Institute'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.

The Institute expects that the following uses will fall within that category of its (or its community's) "**legitimate interests**":

- To confirm the identity of prospective students, parents and children and retain a record if appropriate for the purposes of future applications;
- To provide education services, including where such services are provided remotely (either temporarily or permanently) and to support its students' and children's teaching and learning;
- To monitor and report on their progress;
- To provide appropriate pastoral care;
- To assess how well the Institute as a whole is doing;
- To communicate with former children and students, including direct marketing or fundraising 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 Institute's performance and to intervene or assist with incidents as appropriate;

- To give and receive information and references about past, current and prospective children, including relating to outstanding fees or payment history, to/from any educational institution that the child attended or where it is proposed they attend;
- To give and receive information and references about past, current and prospective students;
- To monitor (as appropriate) use of the Institute's IT and communications systems in accordance with the Institute's IT: acceptable use policy;
- To make use of photographic images of children in school publications, on the Institute's website and (where appropriate) on the Institute's social media channels in accordance with the Institute's policy on taking, storing and using images of children
- For security purposes, including CCTV in accordance with the Institute's CCTV policy;
- 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 Institute or external complaints, disciplinary or investigation process;
- where appropriate, promote the Institute to prospective families and students (including through the Institute's prospectus and website); and
- other reasonable purposes relating to the operation of the Institute.

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

- To safeguard children's and student's 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 comply with public health requirements in respect of Covid-19 (or similar) testing: including managing on-site testing and/or processing the results of tests taken by children, students or staff, and sharing this information with relevant health authorities;
- To provide educational services in the context of any special educational needs of a child or student;
- In connection with employment of its staff, for example DBS checks, welfare, or pension plans;
- As part of any Institute 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 / visa sponsorship compliance) and to comply with its legal obligations and duties of care.

Unless you have requested otherwise, the Institute may also use your contact details to send you promotional and marketing information by post, email and SMS about the Institute and its activities. When you submit information via our website you will have the option to opt out of receiving marketing information. Should you subsequently decide that you would rather not receive such information then there is an “unsubscribe” option on all of our emails or you can contact webadministrator@mariamontessori.org. If you want to receive information but haven't opted in, you can do so by emailing webadministrator@mariamontessori.org

Types of Personal Data Processed by the Institute

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- car details (about those who use our car parking facilities);
- bank details and other financial information, e.g. about parents (or others) who pay fees to the school, and any anti-money laundering information we are required to collect by law;
- past, present and prospective children's or student's academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- personnel files, including in connection with academics, employment or safeguarding;
- nationality and other immigration status information (e.g. right to work / study), including copies of passport information;
- where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- references given or received by the Institute about children and students, and relevant information provided by previous educational establishments and/or other professionals or organisations working with children or students;
- correspondence with and concerning staff, students, children and parents (past and present); and
- images of children and students (and occasionally other individuals) engaging in Institute activities, and images captured by the Institute's CCTV system (in accordance with the Institute's policy on taking, storing and using images of children);

How the Institute Collects Data

Generally, the Institute receives personal data from the individual directly (including, in the case of children, from their parents). This may be via an online form, a hard copy 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 working with that individual or from current or previous employers or educational establishments);

Your right to access your personal data

Children and their parents and/or guardians and students, as data subjects, have certain rights under the Data Protection Act, including a general right to be given access to personal data held about them by any data controller. The presumption is that by the age of 12 a child has sufficient maturity to understand his/her rights and to make an access request themselves if he/she wishes. A parent would normally be expected to make a request on a child's behalf if the child is younger. If you wish

to access your personal data, or that of your child for whom you have parental responsibility, then please contact the Institute in writing.

Third parties with whom the Institute may need to share your personal data

For the most part, personal data collected by the Institute will remain within the Institute, 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 IT- cloud storage / records management, monitoring, mailing. 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 Institute's specific directions.

From time to time the Institute may be required to pass your personal data (including sensitive personal data where appropriate) to third parties, including local authorities, other public authorities, independent Institute bodies such as the Schools Inspection Service and Ofsted, health professionals and the Institute's professional advisers, who will process the data:

- to comply with the law, for example to comply with a court order, or if requested by a government or local authority department which has the lawful authority to obtain the information. This may include a relevant public health / NHS body;
- in response to a request from either the police or a local authority department in connection with our Child Protection obligations;
- to enable the relevant authorities to monitor the Institute's performance;
- For Students enrolled on AMI Diploma and Certificate courses, information will be shared with the Association Montessori Internationale, the awarding body.
- to compile statistical information (normally used on an anonymous basis);
- to secure funding for the Institute (and where relevant, on behalf of individual children);
- to safeguard children's welfare and provide appropriate care for children;
- where specifically requested by children and/or their parents or guardians and by students;
- where necessary in connection with learning and extra-curricular activities undertaken by children;
- to enable children to take part in assessments and to monitor children's progress and educational needs;
- to obtain appropriate professional advice and insurance for the Institute;
- where a reference or other information about a child or student or ex- student is requested by another educational establishment or employer to whom they have applied;
- where otherwise required by law; and
- otherwise where reasonably necessary for the operation of the Institute.
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Access to 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. The Institute needs to process such information to comply with statutory duties and to keep students, children and others safe, but the Institute will ensure only authorised staff can access information on a need-to-know basis. 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 SEND pupil's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the child requires.

Safeguarding data. Staff, students, children and parents are reminded that 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], and in some cases referrals to relevant authorities such as the LADO or police.

KCSIE also requires that, whenever a child leaves the school to join another school, their child protection file is promptly provided to the new organisation. The Institute will retain a copy in accordance with its retention policy for material related to safeguarding matters.

For further information about this, please view the Institute's Safeguarding Policy.

Storing your Information

Information is stored by us on servers located in the UK. We may transfer the information to other reputable third party organisations as explained above – they may store their information inside or outside the European Economic Area. We may also store information in paper files.

Unfortunately, the transmission of information via the internet is not completely secure; any transmission is at your own risk. Once we have received your information, we have in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect online. Whilst we cannot guarantee that loss, misuse or alteration of data will not occur whilst it is under our control, we make every effort to try to prevent this.

Where a password is required to enable you to access parts of our website, it is your responsibility to keep this password confidential. Please do not share your password with anyone.

Retention of Data

The Institute will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason.

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 Bursar. However, please bear in mind that the Institute will often have lawful and necessary reasons to hold on to some personal data even following such 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").

When we no longer require information we will always dispose of it securely, using specialist companies if necessary.

What we won't do with your information

We will never sell or share your information to other organisations to use for their own purposes.

Your rights

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the Institute, 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 Bursar

The Institute 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 Institute 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 Institute may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

For more information about your rights, please see the website of the Information Commissioner's Office at ico.org.uk.

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 or information which is subject to legal privilege (for example legal advice given to or sought by the Institute, or documents prepared in connection with a legal action).

The Institute is also not required to disclose any student examination scripts, provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the Institute 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 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.

Consent

Where the Institute 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, certain types of marketing activity. Please be aware however that the Institute 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 an alumni or parents' association has been requested).

Data Accuracy and Security

The Institute 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 Bursar 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 or 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 Institute may need to process your data, of who you may contact if you disagree.

The Institute 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 systems. All staff and trustees will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

This Policy

The Institute 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.

Further questions

If you have any queries about this Notice or how personal data is processed by the Institute, please contact the Bursar.

If an individual believes that the Institute has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the complaints procedure and should also notify the Bursar. 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 Institute before involving the regulator.