**Privacy notice for parent surveys**

Welcome to the Independent Schools Council's privacy notice for ***parent surveys.***

The Independent Schools Council (‘ISC’) is a membership association made up of independent schools with a head who is in membership of one or more of the five Heads’ associations. We are a not-for-profit company limited by guarantee, registered with Companies House (registered number 1103760), whose registered office is at First Floor, 27 Queen Anne’s Gate, London SW1H 9BU. Our data protection register reference is Z6211327.

This privacy notice provides information on how the ISC collects and processes your personal data when you take part in a parent survey run by us. It is important that you read this privacy notice carefully before agreeing to be involved.

**The data we collect about you**

We may collect, use, store and transfer different kinds of personal data about you as follows:

Identity Data.

Contact Data (including Consent to Contact).

School and Education Data.

Financial Data.

Citizenship and Ethnicity Data (see below).

Family Data.

Property Data.

Occupation Data.

Political Opinions and Party Membership (see below).

Explicit Consent for Special Category Data (see below).

We collect this data by asking you a series of questions in the survey. If you consent to be contacted during the first survey, we may contact you to gather additional information through additional surveys. Not all of the above data may be collected in the particular survey you complete. This will become clear as you go through the survey.

**How and why we use your personal data**

We will only use your personal data for the purpose for which we collected it which include the following:

|  |  |  |
| --- | --- | --- |
| **Parent Survey** | **Purposes** | **Lawful basis** |
| Stage 1 Survey | Stage 1 has the over-arching purpose of better understanding the parent body of ISC member schools as a whole. In particular, we seek to understand what levels of fee they could afford, what forms of promotion could be the most effective, how they might react to the imposition of 20% VAT on fees (a live political threat) and collect sector-wide data as part of ISC’s remit to counter hostile political policies. | The lawful basis we are using to collect this data is legitimate interest. Processing this data is in the legitimate interest of the ISC, the independent school sector, ISC associations and ISC schools.  ISC has undertaken a legitimate interest assessment in relations to this. |
| Stage 2 Survey | To further identify suitable individuals who may be able to support the ISC in its remit to protect and promote the independent sector’s interests, including in the political realm.  Individuals selected by ISC to support the Campaign will be fully informed as to the purpose of their involvement. | The lawful basis we are using to collect this data is legitimate interest. Processing this data is in the legitimate interest of the ISC, the independent school sector, ISC associations and ISC schools.  ISC has undertaken a legitimate interest assessment in relations to this. |

**Special category data**

We may also collect special category data about you and/or your child(ren):

|  |  |  |
| --- | --- | --- |
| **Survey** | **Special Category Data** | **Lawful Basis** |
| Stage 1 Survey | * Citizenship of your child or children * Ethnicity (by ethnic group) of your child or children | In addition to ‘legitimate interests’ above, our lawful basis for using your data is that it is a ‘substantial public interest - equality of opportunity or treatment’ namely to identify whether children from certain ethnic groups are disproportionately impacted should VAT be imposed on school fees.  ISC has prepared an Appropriate Policy Document in relations to this. |
| Stage 2 Survey | * If you are a member of a party (Y/N) * The name of the party you are a member of (if applicable) * How you voted in 2019, and * How you intend to vote next time. | In addition to ‘legitimate interests’ above, we have sought and received your explicit consent to collect and process the special category data being collected in Stage 2.  You can withdraw your consent for this political opinion data to be processed at any time by emailing [publicaffairs@isc.co.uk](mailto:publicaffairs@isc.co.uk). This will not affect the lawfulness of ISC processing this data up to that point. |

ISC will not use your data for other purposes including for marketing purposes.

**How we share your personal data**

We may share your personal data within the ISC. ISC member schools will be sent data in an anonymised form only if 15 or more families completed the survey for that school. Schools may use this aggregated data in the their strategy formation, and in future marketing and recruitment campaigns. No individual’s data will be accessible for these purposes.

**International transfers**

We may transfer, store and process your personal data outside the UK.

The Stage 2 Survey will use Survey Monkey, which stores your personal data in the USA, see their [GDPR white paper](https://prod.smassets.net/assets/cms/sm/uploads/SurveyMonkey-GDPR-Whitepaper-Jul20.pdf). Page 4 provides information on how data may be moved internationally.

**Where is the data stored and for how long?**

The data is stored on the secure ISC servers, and is password protected. Access is limited to those at the ISC who need it to do their work. The servers are subject to an annual Cyber Essentials accreditation test which includes testing that server and networks are secure. Further information is available [here](https://learn.microsoft.com/en-us/compliance/assurance/assurance-datacenter-security).

We will keep your contact data for the duration of the campaign – expected to be approximately 2 years – but for as long as the purposes remain valid and non-anonymisation (linking your responses to your personal details) remains necessary at which point it will be hard deleted meaning that it cannot be retrieved.

**Your legal rights**

Under the UK General Data Protection Regulation (EU 2016/679) and the UK Data Protection Act 2018, you have certain rights associated with the processing of your data:

* to obtain access to, and copies of, the personal data that we hold about you;
* to require us to correct the personal data we hold about you if it is incorrect;
* to require us (in certain circumstances) to erase your personal data;
* to request that we restrict our data processing activities;
* to receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller;
* to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.

You may also withdraw your consent for your personal data to be processed but only where we rely on your consent to do so as set out above. This can be done by emailing [publicaffairs@isc.co.uk](mailto:publicaffairs@isc.co.uk).

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. ISC will endeavour to respond to any such 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).

**Security**

ISC 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 ISC systems. All staff will be made aware of this notice and their duties under data protection law and receive relevant training.

The ISC stores and transfers all data securely and we are committed to ensuring that we only use data processors who are UK GDPR compliant.

For more information on security and ISC’s third party processors, please contact [research@isc.co.uk](mailto:research@isc.co.uk)

**Further details**

If you are looking for more information on how we process your personal data including on data security, data retention and lawful processing bases, please access our website privacy policy [here](https://www.isc.co.uk/privacy-policy/).

**How to contact us**

If you have any questions about this privacy notice or our data protection practices, please contact us at [research@isc.co.uk](mailto:research@isc.co.uk)

**ISC will update this privacy notice from time to time. Please check this policy periodically for details of any changes.**