



Carlisle & Hampton Hill Federation



PRIVACY NOTICE
For Parents
USE OF YOUR CHILD'S DATA

This policy was reviewed:	Autumn 2021
This policy was ratified by Full Governing Body (if applicable):	Not applicable
This policy will be reviewed again:	Autumn 2024
Governor committee responsibility:	A & F Committee
Statutory Policy:	No

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1. Introduction

Under UK data protection law, individuals have a right to be informed about how we use any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **pupils at our schools**.

This privacy notice applies while we believe your child is not capable of understanding and exercising their own data protection rights (generally considered to be age 12, but this has to be considered on a case-by-case basis).

We;

- Carlisle Infant School, Broad Lane, Hampton, TW12 3AJ, 020 8979 2770
- Hampton Hill Junior School, (HHJS) St James's Avenue, Hampton Hill, TW12 1HW, 020 8979 3019

are the 'data controller' for the purposes of UK data protection law.

Our Data Protection Officer is Satswana (see 'Contact us' below).

2. The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about your child includes, but is not restricted to:

- Personal identifiers and contacts (such as name, unique pupil number, contact details, address, date of birth, identification documents)
- Safeguarding information (such as court orders and professional involvement)
- Pupil and curricular records (such as test results, assessment and attainment)
- Behaviour information (such as exclusions and any other relevant alternative provision put in place)
- Attendance information (such as sessions attended, number of absences, absence reasons and any previous schools attended)

We may also collect, use, store and share (when appropriate) information about your child that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- Medical information (such as medical conditions we need to be aware of, including physical and mental health, registered doctor, child health, allergies, medication, dietary requirements)
- Photographs and CCTV images (HHJS only) captured in school. Images of staff and pupils may be captured at appropriate times and as part of educational activities for use in school only. Unless prior consent is given, the school shall not utilize such images for publication or communication to external sources
- Characteristics (such as ethnicity, language and free school meals eligibility)
- Special Educational Needs (details of any support received, including care packages, plans and support providers)

We may also hold data about your child that we have received from other organisations, including other schools and social services.

3. Why we use this data

We process personal information to be able to run the school, to provide pupils with an education and to make sure that we can look after our pupils appropriately. We may collect information directly from pupils or parents or from other places including other schools, the local council and the Department for Education (DfE).

We use the data listed above to:

- a) Keep children safe
- b) Support pupil learning
- c) Monitor and report on pupil progress and check whether any other help is needed
- d) Provide appropriate pastoral care
- e) Look after pupil wellbeing
- f) Keep track of how well we are performing and assess the quality of our services
- g) Administer admissions waiting lists
- h) Meet the statutory duties placed on us (official data collections)
- i) Comply with the law regarding data sharing
- j) Carry out research

3.1 Use of your child's personal data for marketing purposes

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to parents/carers.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

3.2 Use of your child's personal data in automated decision making and profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

4. Our lawful basis for using this data

Data Protection law requires us to have a lawful reason ('lawful basis') for processing the personal data we use. These reasons are listed under Article 6 of the 'General Data Protection Regulation' (GDPR). Our lawful basis for processing will be explained at the point at which we collect personal information unless there is a lawful reason not to do so (for example where it is for the prevention or detection of crime).

Carlisle Infant School and Hampton Hill Junior School process a wide range of personal data for a variety of purposes. The lawful bases we rely on will therefore vary. However, generally, the lawful bases we mainly use in relation to pupils and parents are:

- **We need to comply with the law (we have a legal obligation):** For example we collect and use pupil information under legal and statutory obligations within the Education Act 1996, The Children Act 2004; Education and Inspections Act 2006; Education Act 2011; the Family and Children Act 2014 and Keeping Children Safe in Education (KCSIE) statutory guidelines.
- **We need to carry out a task in the public interest:** For example, the collection and use of pupil information is necessary for us to perform our role as schools and to deliver our public task of providing education to our pupils.

Less commonly, we may also need to use personal information where:

- You have given us your consent (for example a photo of your child on our website).
- We need to protect your vital interests (or someone else's interests). This relates to life and death situations.
- It is in ours or a third party's legitimate interests to process the data. Where this is the case we will ensure that we have considered whether or not our legitimate interests are overridden by your child's rights and freedoms.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so. We will then cease this aspect of processing, unless another lawful basis applies.

Some of the reasons that we use for collecting and using information may overlap and there may be several grounds allowing us to use personal data. There are also other lawful bases that may apply and this will be made clear wherever possible.

4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your child's personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it under Keeping Children Safe in Education legislation
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

5. Collecting this data

While the majority of information we collect about your child is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about your child will come from you, but we may also hold data about your child from:

- Local authorities
- Government departments or agencies

- Other schools (via a common transfer file or hard copy files)
- Police forces, courts, tribunals

6. How we store this data

We keep personal information about your child while they are attending our schools. We will dispose of your child's personal data securely when we no longer need it.

We may also keep it beyond their attendance at our schools if this is necessary. This will be done in accordance with the guidance provided in the [Information Management Society's toolkit for schools](#).

We have put in place appropriate security measures to prevent your child's personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

7. Who we share pupil data with

Information about pupils and parents will not be shared with any third party without consent unless the law and/or our policies allows us to do so. Where it is legally required or necessary (and it complies with UK data protection law) personal information may be shared with the relevant local authority to meet our legal obligations to share information such as safeguarding concerns or with the Department for Education (DfE). To find out more about the data collection requirements that are placed upon us by the DfE including the data that we share with them go to: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

Where it is legally required or necessary (and it complies with UK data protection law), we may share personal information about your child with:

- Our local authority – London Borough of Richmond – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions
- Government departments or agencies, schools may be required to pass on data in order to help the government monitor the educational system and enforce laws relating to education
- Our regulator, e.g. Ofsted
- The pupil's family and representatives
- Educators and examining bodies
- Suppliers and service providers, to enable them to provide the service we have contracted them for, e.g. catering
- Financial organisations, to enable them to provide the service we have contracted them for, e.g. meals, school trips and afterschool care payments
- Health authorities, as obligated under health legislation, the school may pass on information the health of the children in school
- Health and social welfare organisations, in order to protect or maintain the welfare of our pupils, and in cases of child abuse, it may be necessary to pass personal data on to social workers and/or support agencies
- Professional advisers and consultants, in order to protect the welfare of our pupils
- Police forces, courts, tribunals
- Other schools, if a pupil transfers to another school, their academic records and other data that relates to their health and welfare will be forwarded on to the new school. This will support a smooth transition from one school to the next.

National Pupil Database

We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school census.

Some of this information is then stored in the [National Pupil Database](#) (NPD), which is owned and managed by the Department and provides evidence on school performance to inform research.

The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The Department for Education may share information from the NPD with third parties, such as other organisations which promote children's education or wellbeing in England. These third parties must agree to strict terms and conditions about how they will use the data.

For more information, see the Department's webpage on [how it collects and shares research data](#).

You can also [contact the Department for Education](#) with any further questions about the NPD.

7.1 Transferring data internationally

Where we transfer your child's personal data to a third-party country or territory, we will do so in accordance with UK data protection law and ensure that we have sufficient safeguards in place.

8. Your rights

8.1 How to access personal information that we hold about your child

You have a right to make a 'subject access request' to gain access to personal information that we hold about your child.

If you make a subject access request, and if we do hold information about your child, we will (subject to any exemptions that apply):

- › Give you a description of it
- › Tell you why we are holding and processing it, and how long we will keep it for
- › Explain where we got it from, if not from you
- › Tell you who it has been, or will be, shared with
- › Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- › Give you a copy of the information in an intelligible format within one month, unless an extension is necessary on the grounds of the complexity of the request

You may also have the right for your child's personal information to be transmitted electronically to another organisation in certain circumstances. If you would like to make a request, please contact the Data Protection Officer (see 'Contact us' below).

8.2 Your right to access your child's educational record

Parents, or those with parental responsibility, also have the right to access their child's educational record (which includes most information about a pupil). This right applies as long as the pupil is aged under 18.

There are certain circumstances in which this right can be denied, such as if releasing the information might cause serious harm to the physical or mental health of the pupil or another individual, or if it would mean releasing exam marks before they are officially announced.

To make a request, please contact our Data Protection Officer (see 'Contact us' below).

8.3 Your other rights regarding your child's data

Under UK data protection law, you have certain rights regarding how your child's personal data is used and kept safe. For example, you have the right to:

- › Object to our use of your child's personal data
- › Prevent your child's data being used to send direct marketing

- Object to and challenge the use of your child's personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about your child deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your child's personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact the Data Protection Officer (see 'Contact us' below).

9. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

10. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer:

- For GDPR breaches or queries please contact Satswana: 01252 516898 or 01252 516864. admin@satswana.com or help@satswana.com.
- Carlisle Infant School, Broad Lane, Hampton, TW12 2TN, 020 8979 2770, info@carlisle.richmond.sch.uk
- Hampton Hill Junior School, St James's Avenue, Hampton Hill, TW12 1HW, 020 8979 3019, info@hamptonhill.richmond.sch.uk