



# Carlisle & Hampton Hill Federation



## PRIVACY NOTICE FOR PARENTS/CARERS & PUPILS

This policy was reviewed:	January 2019
This policy was ratified by Full Governing Body (if applicable):	Not applicable
This policy will be reviewed again:	January 2020
Governor committee responsibility:	A & F Committee
Statutory Policy:	No



# Carlisle & Hampton Hill Federation



## Carlisle Infant School

Broad Lane, Hampton, Middlesex, TW12 3AJ  
Tel: 020 8979 2770

E-mail: [info@carlisle.richmond.sch.uk](mailto:info@carlisle.richmond.sch.uk)  
[www.carlisleandhamptonhillfed.richmond.sch.uk](http://www.carlisleandhamptonhillfed.richmond.sch.uk)

**Head Teacher:** Mrs Z Brittain BA (Hons)  
**Deputy Head:** Miss V Trinder BA (Hons)

## Hampton Hill Junior School

St. James's Avenue, Hampton Hill, Middx, TW12 1HW  
Tel: 020 8979 3019

Email: [info@hamptonhill.richmond.sch.uk](mailto:info@hamptonhill.richmond.sch.uk)  
[www.carlisleandhamptonhillfed.richmond.sch.uk](http://www.carlisleandhamptonhillfed.richmond.sch.uk)

**Head teacher:** Mr A Went B.Ed (Hons)  
**Deputy Head:** Mrs A Appleyard BAQTS

Under data protection law, individuals have a right to be informed about how the school uses 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**.

We, Carlisle Infant School and Hampton Hill Junior School, are the 'data controller' for the purposes of data protection law.

Our Data Protection Officer (DPO) is Yolanda Mapes (see 'Contact us' below).

## The personal data we hold

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

- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Characteristics, such as ethnic background, eligibility for free school meals, nationality, place of birth or special educational needs
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs
- CCTV images captured in school (HHJS only).

We may also hold data about pupils that we have received from other organisations, including other schools, local authorities and the Department for Education.

## Why we use this data

We use this data to:

- Support pupil learning
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Protect pupil welfare
- Assess the quality of our services
- Administer admissions waiting lists
- Carry out research
- Comply with the law regarding data sharing.

## Our legal basis for using this data

We only collect and use pupils' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest

Less commonly, we may also process pupils' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests).

Where we have obtained consent to use pupils' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using pupils' personal data overlap, and there may be several grounds which justify our use of this data.

## Collecting this information

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

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

## Location of information and data

We keep personal information about pupils while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations.

Hard copy data, records and personal information are stored out of sight and in a locked cupboard. The only exceptions to this are medical information that may require immediate access during the school day and food allergy information (stored in the office and welfare room) that is required during lunchtimes (stored in the kitchen).

Sensitive or personal information and data should not be removed from the school site, however, the school acknowledges that staff may need to transport data between the school and their

home in order to access it for work in the evening and at weekends. This may also apply in cases where staff have off site meetings or are on school visits with pupils.

The following guidelines are in place for staff in order to reduce the risk of personal data being compromised:

- Paper copies of data or personal information should not be taken off the school site. If they are misplaced they are easily accessed. If there is no way to avoid taking a paper copy of data off the school site, the information should not be on view in public places, or left unattended under any circumstances
- Unwanted paper copies of data, sensitive information or pupil files must be shredded. This also applies to handwritten notes if the notes reference any other staff member or pupil by name
- Care must be taken to ensure that printouts of any personal or sensitive information are not left in printer trays or photocopiers
- If information is being viewed on a PC, staff must ensure that the window and documents are properly shut down before leaving the computer unattended. Sensitive information should not be viewed on public computers
- If it is necessary to transport data away from the school, it should be downloaded onto a USB stick. The data should not be transferred from this stick onto any home or public computers. Work should be edited from the USB, and saved onto the USB only
- USB sticks that staff use must be password protected.

These guidelines are clearly communicated to all school staff, and any person who is found to be intentionally breaching this conduct will be disciplined in line with the seriousness of their misconduct.

## Data Sharing

Personal data about pupils will not be disclosed to third parties without the consent of the parents/carers unless it is obligated by law and our policies allow us to do so or in the best interest of the child. Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about pupils with:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
- The Department for Education – schools may be required to pass data on in order to help the government to monitor the national educational system and enforce laws relating to education
- The pupil's family and representatives
- Educators and examining bodies
- Our regulator, e.g. Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for, for example parental engagement
- Health authorities – as obligated under health legislation, the school may pass on information regarding the health of children in the 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 bodies, advisers and consultants – in order to protect or maintain the welfare of our pupils
- Police forces, courts, tribunals
- Other schools – if a pupil transfers from Carlisle or Hampton Hill to another school, their academic records and other data that relates to their health & welfare will be forwarded on to the new school. This will support a smooth transition from one school to the next

- Right to be forgotten – Where any personal data is no longer required for its original purpose, an individual can request that the processing is stopped and all their personal data is erased by the school including any data held by contracted processors.

## **Photographs and video**

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 from parents/carers or staff is given the school shall not utilise such images for publication or communication to external sources.

## **Data Retention**

The school has a duty to retain some staff and pupil personal data for a period of time following their departure from the school, mainly for legal reasons, but also for other purposes such as being able to provide references. Different categories of data will be retained for different periods of time, this is outlined on our Retention of Data Schedule (please see our Data Protection Policy).

## **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 other organisations which promote children's education or wellbeing in England. Such organisations 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.

## **Transferring data internationally**

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

## **Safeguarding**

Please note: GDPR and the Data Protection Act 2018 are not a barrier to sharing information where the failure to do so would cause the safety or wellbeing of the individual to be compromised.

## Parents and pupils' rights regarding personal data

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

Parents also have the right to make a subject access request with respect to any personal data the school holds about them.

If you make a subject access request, and if we do hold information about you or your child, we will:

- 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 or your child
- 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 form.

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our Data Protection Officer. Please note, the identity of the requestor must be established before the disclosure of any information. In the case of parent/carer requests, checks will be carried out regarding proof of relationship to the child.

Evidence of identity can be established by requesting production of:

- Passport
- Driving Licence
- Utility Bill (with the current address)
- Birth/Marriage Certificate
- P45/P60
- Credit Card/Mortgage Statement.

\*Please note this list is not exhaustive

The School aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within one month from the day after receipt, as required by the 2018 Data Protection Act.

Parents/carers also have a legal right to access to their child's **educational record**. To request access, please contact Yolanda Mapes, DPO.

## Other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations.

To exercise any of these rights, please contact our Data Protection Officer.

## 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.

To make a complaint, please contact our Data Protection Officer, Yolanda Mapes.

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

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

## Contact us

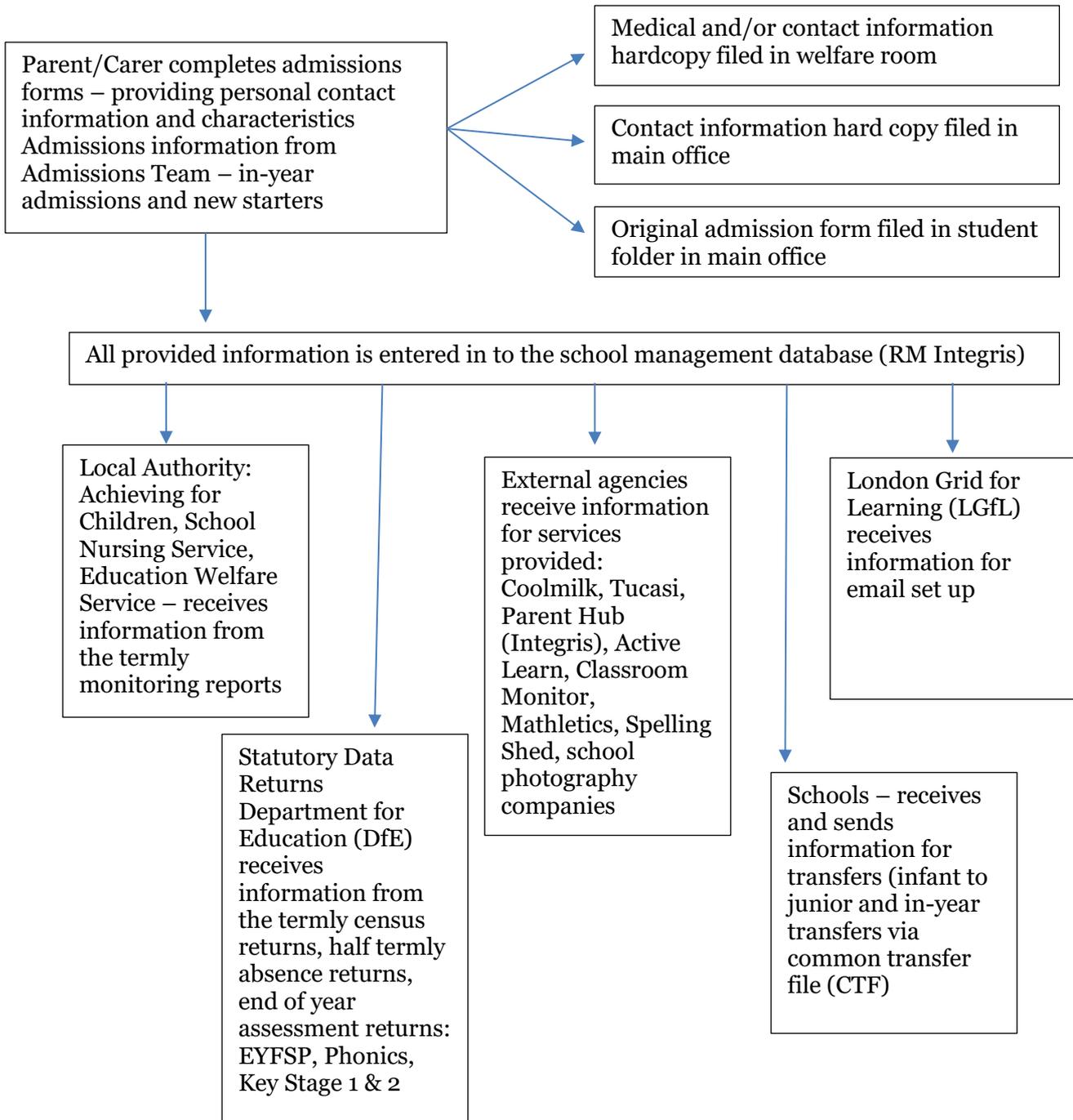
If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **Data Protection Officer**:

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

*This notice is based on the Department for Education's model privacy notice for pupils, amended for parents and to reflect the way we use data in this school.*



### INFORMATION PROCESSING MAP



Child Protection & Safeguarding Documents – stored in a locked cabinet in the HT office.  
SEND Documents – stored in a locked cabinet in SENCO office

Archives – Electronic information is archived to a separate part of the operating system.  
Hard copy information is sent to next school or archived to a locked cupboard/securely disposed of as per the data retention schedule

