

# PRIVACY NOTICE

<College Road Primary School Parents/Carers Privacy Notice>

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## INTRODUCTION

Being transparent and providing accessible information to individuals about how we use personal information is a key element of the Data Protection Act and the General Data Protection Regulation (Regulation (EU) 2016/679).

This data is collected in a number of ways but namely via the Local Authority, Department for Education (DfE), registration forms or a secure link with other School's Information Management System. This document provides information on the data collected and how it is used.

## THE CATEGORIES OF INFORMATION THAT WE PROCESS INCLUDE:

- Personal identifiers for you and your child including contacts (such as name, unique pupil number, contact details and address);
- Characteristics (such as ethnicity, language, and free school meal eligibility);
- Safeguarding information (such as court orders and professional involvement);
- Special educational needs (including the needs and ranking);
- Medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements);
- Attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended);
- Assessment and attainment (such as <key stage 1 and phonics results>, <post 16 courses enrolled for and any relevant results> *delete as appropriate*);
- Behavioural information (such as exclusions and any relevant alternative provision put in place).

This list is not exhaustive, to access the current list of categories of information we process please see our data asset register.

## PROCESSING PERSONAL INFORMATION

The Data Protection Act 2017 and the EU General Data Protection Regulation ensure that we comply with a series of data protection principles when processing personal data. These principles are there to protect you and they make sure that we:

- Process all personal information lawfully, fairly and in a transparent manner;
- Collect personal information for a specified, explicit and legitimate purpose;
- Ensure that the personal information processed is adequate, relevant and limited to the purposes for which it was collected;
- Ensure the personal information is accurate and up to date;
- Keep your personal information for no longer than is necessary for the purpose(s) for which it was collected;
- Keep your personal information securely using appropriate technical or organisational measures;

## WHY WE COLLECT AND USE PERSONAL INFORMATION

The personal data we collect is essential for our school to fulfil our official functions and meet legal requirements, to keep accurate and timely records in accordance with GDPR and to ensure the Safeguarding of children. Our school's responsibility is to keep the data that we hold on children, parents and carers up to date, appropriate and accurate.

GDPR also requires that we have a lawful basis to collect and use pupil information as shown below:

We collect and use pupil information to:	Our lawful basis for processing the information is:
a. Support pupil learning	Public Task – processing is necessary for us to perform our statutory function
b. Monitor and report on pupil attainment progress	Public Task – processing is necessary for us to perform our statutory function
c. Provide appropriate pastoral care	Public Task – processing is necessary for us to perform our statutory function
d. Assess the quality of our services	Public Task – processing is necessary for us to perform our statutory function
e. Keep children safe (food allergies, medical conditions, emergency contact details etc.)	Vital Interests – to protect pupils lives
f. Meet statutory duties placed upon us	Legal Obligation – data collected for the Department for Education census information for example
g. Record events, activities and achievements (photographs/video footage)	Consent (see below)
h. Facilitate trips and transport arrangements	Consent (see below and <b>*important note</b> )

## INFORMATION SHARING AND CONSENT

During your child's time at the school you will be informed of how you, or your children's, information will be used and shared with other services or organisations. The joint sharing of information is vital for safeguarding and to ensure that the school provides an efficient and effective service. This includes working within Children Missing Education (CME) guidelines, data protection regulations, Admission & Transfer (A&T) processes and DfE guidelines.

We will usually seek your or your child's consent prior to processing or sharing your information. If you or they object you must inform the school, however, if there is a legal reason, as outlined under the Data Protection Act, we may not require consent, for example:

- To protect a child, a vulnerable adult, or member of the public
- Where the disclosure is necessary for the purposes of the prevention and/or detection of crime.
- Tax or duty assessment
- Required by court or law

We will also need to share pupils' information with our partner organisations that support the delivery of the service pupils may receive. The information collected will be shared when appropriate with:

- Child Health Information Service (CHIS)
  - School Nursing Service
  - School immunisation Providers
- University Hospitals NHS Trust Orthoptic Team
- Families with a Future Programme
- Youth Support Services (Careers South West)

- Once pupils reach the age of 13 we pass their information to our local authority provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.
- We also share information with this service about pupils aged 16+ under the same legislation.
- Children, Young People & Family Service
- Schools that pupils attend after leaving us
- Our local authority

**Consent is not sought in relation to sharing basic data (name, address, DOB) with the Child Health Information Service (CHIS) and University Hospitals NHS Trust Orthoptic Team as their use of the data is in the public interest as it directly benefits patient and public health. An opportunity to provide consent will be made available under the specific initiatives co-ordinated by the health care providers eg Child Measurement Programme, School Immunisations and Eye Test for 4 & 5 year old children.**

Where we need to disclose sensitive or confidential information such as medical details to other partners, we will do so only with your or your child's prior explicit consent or where we are legally required to. We may disclose information when necessary to prevent risk of harm to an individual.

**\*Important note:** consent to **attend** a trip or **use** transport organised by the school will always be obtained from you (parent/carer). Your child **may** be asked to consent **only** to us using their personal information for these purposes.

### **Withdrawal of consent**

Where we are processing personal data with your or your child's consent, you or they have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the administrator on 567660 or by emailing [college.rd.primary.school@plymouth.gov.uk](mailto:college.rd.primary.school@plymouth.gov.uk)

We do **not** share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

We will only ever share information if we are satisfied that our partners or suppliers have sufficient measures in place to protect our pupil's information in the same way that we do.

We will never share personal information for marketing purposes.

### **RETENTION PERIODS**

- We will not keep data for longer than we need it. Data will be retained in line with the [Information and Records Management Society's toolkit for schools](#).
- Personal Data will be safely destroyed or deleted when it is no longer needed.

### **INDIVIDUAL RIGHTS REGARDING PERSONAL DATA**

Under data protection legislation, parents and pupils have rights in relation to information about them that we hold.

You have the right:

- To be informed via Privacy Notices such as this;
- To ask us for access to information about you that we hold;
- To have your personal data rectified, if it is inaccurate or incomplete;
- To request the deletion or removal of personal data to prevent processing unless we have a legal obligation to process your personal information;

- To restrict our processing of your personal data (i.e. permitting its storage but no further processing);
- To data portability. We need to be able to provide you with your personal data in a structured, commonly used, machine readable form when asked;
- To object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics;
- Not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.

To make a request under any of your rights please refer to the 'Subject Rights Advice & Application Form', or contact the Data Protection Officer.

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## **LAST UPDATED**

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated October 2018.

## **DATA CONTROLLER**

College Road Primary School is registered as a data controller with the Information Commissioner's Office (registration number: tbc).

## **CONTACT**

If you would like to discuss anything in this privacy notice, please contact: our Data Protection Officer, Liz Easterbrook in writing at Finance, Plymouth City Council, Ballard House, West Hoe Road, Plymouth, PL1 3BJ, by telephone on 01752 398380 or by email at [dataprotectionofficer@plymouth.gov.uk](mailto:dataprotectionofficer@plymouth.gov.uk)