

# Roxbourne Primary School



## Privacy Notice Pupils and Parents

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<b>Link Governor (if applicable)</b>	N/A
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## 1. Privacy Notice for Parents/Carers

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, Roxbourne Primary School, Torbay Road, HA2 9QF are the 'data controller' for the purposes of data protection law.

Our nominated data protection officer is a representative from The DPO Centre and can be contacted by email at [kh@dpocentre.com](mailto:kh@dpocentre.com).

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

- personal information (such as name, address and unique pupil number, contact details)
- special categories of personal data including characteristics information (such as sex, age, ethnic group, religious belief, religion, country of birth, Nationality and free school meal eligibility)
- Pupil assessment information (for example, national curriculum assessment results)
- Attendance information (for example, monitoring sessions attended, number of absences and absence reasons)
- Relevant medical information including physical and mental health, dietary requirements and allergies
- Information relating to special educational needs.
- Photographs
- CCTV images captured in school
- Behavioural information – inclusive of exclusions
- Safeguarding information
- Details of support received including care packages, plans and support providers. Tax details and National Insurance Number (parents) – for Free School meal applications

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

## **2. 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
- Comply with the law regarding data sharing
- Provide educational services including music tuition and extra-curricular activities · To fulfil our contractual and legal obligations
- For security purposes including CCTV

## **3. 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.

#### **4. Collecting this information**

We only collect information that we know we will genuinely use and in accordance with the Data Protection Legislation. The type of information that we will collect on you, and you voluntarily provide to us on this website/form/service includes:

- Your name
- Address
- Telephone number(s)
- Email address
- Survey responses
- IP address

We may, in further dealings with you, extend this information to include your address, purchases, services used, and subscriptions, records of conversations and agreements and payment transactions etc.

- You are under no statutory or contractual requirement or obligation to provide us with your personal information; however we require at least the information above in order for us to support you as a member of our school community in an efficient and effective manner.
- The legal basis for processing your data is based on your specific consent/performance of a contract/compliance with a legal obligation/your vital interest/our legitimate interest that we will have requested at the point the information was initially provided, therefore we will not store, process or transfer your data outside the parties detailed above unless we have an appropriate lawful reason to do so.

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.

#### **5. How we use your information**

- To contact you, following your enquiry, reply to any questions, suggestions, issues or complaints you have contacted us about;
- Make available our products and services to you;
- Process your orders;
- Take payment from you or give you a refund;
- For statistical analysis and to get feedback from you about our products, websites, mobile apps, and other services and activities. For example,

occasionally we may invite you to review a product or service you've bought or used from us. If we do, it's possible that we'll use independent research and feedback providers to act on our behalf;

- To power our security measures and services so you can safely access our website and mobile apps;
- Help us understand more about you as a member of our school community, the products and services you consume, so we can serve you better;
- Contact you about products and services from us;
- Provide you with online advertising and promotions; and
- Help answer your questions and solve any issues you have.

## **6. How we store this data**

In accordance with the GDPR, the controller does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected. We may keep data beyond their child's attendance at the school if this is necessary to comply with our legal obligations. We follow the guidance from the [Information and Records Management Society's toolkit for schools](#)

## **7. Data sharing**

We may share your personal data with other organisations in the following circumstances:

- If the law or a public authority says we must share the personal data;
- If we need to share personal data in order to establish, exercise or defend our legal rights (this includes providing personal data to others for the purposes of preventing fraud and reducing credit risk); or
- From time to time, employ the services of other parties for dealing with certain processes necessary for the operation of the website. However, all the information we share will be collected and anonymised, so neither you nor any of your devices can be identified from it.

We are required to share information about our pupils with our local authority (LA) and the Department for Education (DfES) under section 3 of The Education (Information about Individual Pupils) (England) Regulations 2013.

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

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

After school club providers	Provision of extra - curricular activities	Public Task
Capita/Arbor	Management information system to record all pupil data/attendance tracking/ parental engagement	Contract
Cool Milk	provision of milk for under 5's	Public Task
Health authorities	To enable data collection for health strategies	Public Task
Inventry Visitor System	Safeguarding to track the presence of children and visitors in school	Public Task
Learning Platforms	to enhance teaching using computer technology	Public Task
Ofsted	Academic data (anonymised)	Public Task
Other Schools	To support transition to new school	Public Task
Our local authority	To meet our legal obligations to share certain information such as safeguarding concerns and exclusions	Public Task
Parent Pay	to enable parent to make payment for school meals and trips	Public Task
Police forces, courts, tribunals	to pass information as required by law	Public Task
Professional advisers and consultant	To assess children's needs and advise on educational strategies	Contract
School photographer	Pupil identification, photographs for parent	Consent
Suppliers and services providers	To enable the provider to provide the service we have contracted them for	Contract

Teachers to parents	Email and text communication to parents	Contract
The Department for Education	to meet our legal obligations	Public Task
Website (Primary Site)	Photographs to support marketing the school	Consent

New providers and contractors will be appropriately risk assessed prior to commencing any data sharing.

## 8. 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.

## 9. 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.

Parents/Carers also have a legal right to access to their child's educational record. To request access, please contact our School Business Manager via the school office 0208 422 9207.

## **10. 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

## **11. How long we keep your information**

We retain a record of your personal information in order to provide you with a high quality and consistent service. We will always retain your personal information in accordance with the Data Protection Legislation and never retain your information for longer than is necessary. Unless otherwise required by law, your data will be

stored for a period of 2 years after [our last contact with you/some other identifiable action or period, at which point it will be deleted.

## **12. Giving your reviews and sharing your thoughts**

When using our websites or mobile applications, you may be able to share information through social networks like Facebook and Twitter. For example, when you 'like', 'share' or review our Services. When doing this, your personal information may be visible to the providers of those social networks and/or their other users. Please remember it is your responsibility to set appropriate privacy settings on your social network accounts so you are comfortable with how your information is used and shared on them.

## **13. Security**

Data security is of great importance to us and to protect your data we have put in place suitable physical, electronic and managerial procedures to safeguard and secure your collected data. We take security measures to protect your information including:

Limiting access to our buildings to those that we believe are entitled to be there (by use of passes, key card access and other related technologies);

- Implementing access controls to our information technology
- We use appropriate procedures and technical security measures (including strict encryption, anonymisation and archiving techniques) to safeguard your information across all our computer systems, networks, websites, mobile apps, offices and stores.
- Never asking you for your passwords
- Advising you never to enter your account number or password into an email or after following a link from an email

## **14. How to contact us**

If you would like to exercise one of your rights as set out above, or you have a question or a complaint about this policy, the way your personal information is processed, please contact us by one of the following means:

By email: [office@harrow.roxbourne.sch.uk](mailto:office@harrow.roxbourne.sch.uk)

By post: Roxbourne Primary School, Torbay Road, Harrow, Middlesex HA2 9QF