



Holywell Primary School

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We are a learning community with the spirit to succeed

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PRIVACY NOTICE FOR PARENTS/CARERS OF PUPILS ATTENDING HOLYWELL PRIMARY SCHOOL

Holywell Primary School collects data and information about parents/carers of our pupils so that we can operate effectively as a school. This privacy notice explains how and why we collect parent/carer data, what we do with it and what rights parents have.

The term "parent" is widely defined in education law to include the natural or adoptive parents (regardless of whether parents are or were married, whether a father is named on a birth certificate or has parental responsibility for the pupil, with whom the pupil lives or whether the pupil has contact with that parent), and also includes non-parents who have parental responsibility for the pupil, or with whom the pupil lives. It is therefore possible for a pupil to have several "parents" for the purposes of education law. This privacy notice also covers other members of pupils' families who we may process data about from time to time, including, for example, siblings, aunts and uncles and grandparents.

We are a large community school based in West Watford. Our Data Protection Office is Mr Abbas Gulamali, he can be contacted by email – DPO@holywell.herts.sch.uk

Why do we collect and use parent / carer information?

We collect and use parent / carer information under the following lawful bases:

- where we have the consent of the data subject (Article 6 (a));
- where it is necessary for compliance with a legal obligation (Article 6 (c));
- where processing is necessary to protect the vital interests of the data subject or another person (Article 6(d));
- where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Article 6 (e)).

Where the personal data we collect about parents / carers is sensitive personal data, we will only process it where:

- we have explicit consent;
- processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent; and / or
- processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, where we respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Please see our Data Protection Policy for a definition of sensitive personal data.

We use the parent/carer data to support our functions of running a school, in particular:

- to decide who to admit to the school;
- to maintain a waiting list;



- c. to support pupil learning;
- d. to monitor and report on pupil progress;
- e. to provide appropriate pastoral care;
- f. to assess the quality of our services;
- g. to comply with the law regarding data sharing;
- h. for the protection and welfare of pupils and others in the school, including our safeguarding/child protection obligations;
- i. for the safe and orderly running of the school;
- j. to promote the school;
- k. to send you communications that may be of interest to you which may include information about school events or activities, news, campaigns, appeals, other fundraising activities;
- l. in order to respond to investigations from our regulators or to respond to complaints raised by our stakeholders;
- m. in connection with any legal proceedings threatened or commenced against the school.

The categories of parent/carer information that we collect, hold and share include:

- a. Personal information (such as name, address, telephone number and email address);
- b. Information relating to your identity, marital status, employment status, religion, ethnicity, language, medical conditions, nationality, country of birth and free school meal / pupil premium eligibility / entitlement to certain benefits, information about court orders in place affecting parenting arrangements for pupils);
- c. Safeguarding information, information about criminal proceedings

From time to time and in certain circumstances, we might also process personal data about parents / carers, some of which might be sensitive personal data, information about criminal proceedings / convictions or information about child protection / safeguarding. This information is not routinely collected about parents / carers and is only likely to be processed by the school in specific circumstances relating to particular pupils, for example, if a child protection issue arises or if a parent / carer is involved in a criminal matter. Where appropriate, such information may be shared with external agencies such as the child protection team at the Local Authority, the Local Authority Designated Officer and / or the Police. Such information will only be processed to the extent that it is lawful to do so and appropriate measures will be taken to keep the data secure.

We collect information about parents/carers before pupils join the school and update it during pupils' time on the roll as and when new information is acquired.

Collecting parent/carer information

Whilst the majority of information about parents/carers provided to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain parent / carer information to us or if you have a choice in this. Where appropriate, we will ask parents / carers for consent to process personal data where there is no other lawful basis for processing it, for example where we wish to use your information for marketing purposes or to request voluntary contributions. Parents / carers may withdraw consent given in these circumstances at any time.

In addition, the School also uses CCTV cameras around the school site for security purposes and for the protection of staff and pupils. The school reserves the right to use its CCTV footage when investigating issues in school. CCTV footage involving parents / carers will only be processed to the extent that it is lawful to do so.

Storing parent / carer data

A significant amount of personal data is stored electronically, for example, on our database, SIMS. Some information may also be stored in hard copy format.

Data stored electronically is saved on a cloud based system which is accessed via Herts for Learning.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, insurance or reporting requirements. Details of retention periods for different aspects of your personal information are available in our data retention schedule, available on request.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a parent / carer we will retain and securely destroy your personal information in accordance with applicable laws and regulations.

Who do we share parent / carer information with?

We routinely share parent / carer information with:

- schools that pupils attend after leaving us;

From time to time, we may also share parent / carer information other third parties including the following:

- our local authority Hertfordshire County Council;
- a pupil's home local authority (if different);
- the Department for Education (DfE);
- school governors;
- the Police and law enforcement agencies;
- NHS health professionals including the school nurse, educational psychologists,
- Education Welfare Officers;
- Courts, if ordered to do so;
- the Teaching Regulation Authority;
- Prevent teams in accordance with the Prevent Duty on schools;
- other schools, for example, if we are negotiating a managed move and we have your consent to share information in these circumstances;
- our legal advisors;
- our insurance providers / the Risk Protection Arrangement;

Some of the organisations referred to above are joint data controllers. This means we are all responsible to you for how we process your data.

In the event that we share personal data about parents / carers with third parties, we will provide the minimum amount of personal data necessary to fulfil the purpose for which we are required to share the data.

Requesting access to your personal data

Under data protection legislation, parents / carers have the right to request access to information about them that we hold ("Subject Access Request"). To make a request for your child's personal data, or be given access to your child's educational record, contact the Data Protection Officer – DPO@holywell.herts.sch.uk Please note written request for personal data will be treated as a Subject Access Request.