



General Data Protection Regulation (2018)

PRIVACY NOTICE FOR PARENTS / CARERS / PUPILS ATTENDING

CHRIST CHURCH CofE (VA) PRIMARY SCHOOL & NURSERY

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

Privacy Notice (How we use parent / carer /pupil information)

We are a Voluntary Aided Primary School, and Christ Church School is the Data Controller for the information we hold.

Our Data Protection Officer (DPO) is Alexandra Parrish, who can be contacted through the school office on telephone number 01920 462158 or by email at dpo@christchurch.herts.sch.uk

Why do we collect and use parent / carer / pupil information?

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

- a. where we have the consent of the data subject (Article 6 (a));
- b. where it is necessary for compliance with a legal obligation (Article 6 (c));
- c. where processing is necessary to protect the vital interests of the data subject or another person (Article 6(d));
- 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 / pupils is sensitive personal data, we will only process it where:

- a. we have explicit consent;
- b. 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
- c. 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. [This is currently being finalised and will be available on our website once completed].

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

- a. to decide who to admit to the school;
- b. to maintain a waiting list (for Nursery applications only);
- 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 / pupil information that we collect, hold and share include:

- a. Personal information (such as name, address, telephone number and email address);
- b. Information relating to 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);

From time to time and in certain circumstances, we might also process personal data, 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 / pupils 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 / pupil 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 / pupils before pupils join the school and update it during pupils' time on the roll as and when new information is acquired.

Collecting parent / carer / pupil information

Whilst the majority of information provided to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with GDPR, we will inform you whether you are required to provide certain 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. Parents / carers may withdraw consent given in these circumstances at any time.

Storing parent / carer / pupil 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.

We will only retain your personal information for as long as necessary, and in line with the IRMS Information Management Toolkit. At the present time, the school's MIS system does not have the capability to archive pupils who have left the school, however, a resolution to this is being worked on by Hertfordshire County Council who provide our MIS system.

Who do we share parent / carer / pupil 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 / pupil information with 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);
- 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.

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 / pupils 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 / pupils 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 either Alexandra Parrish, DPO or, Debbie Beckwith, School Secretary, although any written request for personal data will be treated as a Subject Access Request (SAR).

The legal timescales for the School to respond to a SAR is one calendar month. As the School has limited staff resources outside of term time, we encourage parents / carers [to submit SARs during term time and to avoid sending a request during periods when the School is closed or is about to close for the holidays where possible. This will assist us in responding to your request as promptly as possible. [For further information about how we handle SARs, please see our Data Protection Policy which will be published on our Website].

No fee usually required

There is no fee to access personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if the request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.



What we may need from parents / carers

We may need to request specific information from parents / carers to help us confirm their identity and ensure their right to access the information (or to exercise any of their other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Parents / Carers also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of our data protection responsibilities.

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where parents / carers may have provided consent to the collection, processing and transfer of personal information for a specific purpose, you have the right to withdraw consent for that specific processing at any time. To withdraw your consent, please contact Debbie Beckwith, School Secretary. Once we have received notification that a parent / carer has withdrawn consent, we will no longer process information for the purpose or purposes originally agreed to, unless we have another legitimate basis for doing so in law.

DATA PROTECTION OFFICER

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO, Alexandra Parrish by email on dpo@christchurch.herts.sch.uk. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will publish a new privacy notice when we make any substantial updates. We may also notify you in other ways (eg Email) from time to time about the processing of your personal information.