



Larwood Academy Trust



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PRIVACY NOTICES PARENTS & CARERS POLICY

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1. DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about you must be:

- a) Used lawfully, fairly and in a transparent way.
- b) Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- c) Relevant to the purposes we have told you about and limited only to those purposes.
- d) Accurate and kept up to date.
- e) Kept only as long as necessary for the purposes we have told you about.
- f) Kept securely.

2. WHY DO WE COLLECT AND USE PARENT / CARER INFORMATION?

We collect and use parent / carer information under the following lawful bases under the UK General Data Protection Regulation (UK GDPR):

- 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 is sensitive personal data, we will only process it where:

- a) we have explicit consent (Article 9 (2)(a));
- 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 [Article 9 (2)(c)]; and /or
- c) processing is necessary for reasons of substantial public interest, and is authorised by UK law (see section 10 of the 2018 Data Protection Act) (Article 9 (2)(g)).

Please see the DET Data Protection Policy (<https://onslow.herts.sch.uk/244/policies>) for a definition of sensitive personal data.

3. STATUTORY FUNCTIONS

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

- a) to decide who to admit to the school;
- b) to support student learning;
- c) to monitor and report on student progress;
- d) to provide appropriate pastoral care;
- e) to assess the quality of our services;
- f) to comply with the law regarding data sharing;
- g) for the protection and welfare of students and others in the school, including our safeguarding/ child protection obligations;
- h) for the safe and orderly running of the school;
- i) to promote the school;
- j) 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;
- k) in order to respond to investigations from our regulators or to respond to complaints raised by our stakeholders;
- l) in connection with any legal proceedings threatened or commenced against the school.

4. PARENT / CARER INFORMATION THAT WE COLLECT, HOLD AND SHARE

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are “special categories” of more sensitive personal data which require a higher level of protection.

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 / student premium eligibility / entitlement to certain benefits, information about court orders in place affecting parenting arrangements for students.

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 students, 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.

5. COLLECTING PARENT / CARER INFORMATION

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

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 UK GDPR, 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 ask your permission 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 students. CCTV footage may be referred to during the course of disciplinary procedures (for staff or students) or investigate other issues. CCTV footage involving parents / carers will only be processed to the extent that it is lawful to do so. Please see the DET CCTV Policy for more details.

6. STORING PARENT / CARER DATA

We hold your data securely and have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. Access to information is limited to those who have a business need to know it and who are subject a duty of confidentiality. A significant amount of personal data is stored electronically, for example, on our MIS databases. Some information may also be stored in hard copy format.

Data stored electronically may be saved on a cloud based system which may be hosted in a different country.

We may sometimes transfer student personal data to other countries if, for example, we are arranging a school trip to a different country. In these circumstances, appropriate steps will be taken to keep the data secure.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach involving your data where we are legally required to do so.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including

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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 Guidelines which is available from the school's DPO, Sarah Millhouse. 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 our Data Retention Schedule or applicable laws and regulations.

7. DATA SHARING

We share parent / carer data with third parties, including third-party service providers and other organisations. In particular, we may share parent / carer data with organisations including, but not limited to, those detailed below.

We routinely share parent / carer information with:

- Danes Educational Trust (Multi-Academy Trust);
- schools that students attend after leaving us;
- Group call, so that we can communicate with you via text message;
- Wise pay / Parent Pay, so that you can pay for school lunches and visits/trips;
- Capita SIMS, Cloud School (formerly Progresso) and Arbor, the school's Management Information Systems, so that you can review your child's progress at school, behaviour and homework;
- CPOMs, for child protection, safeguarding, pastoral and welfare purposes;
- Google Workspace (including Google Classroom) and Google Cloud Platform, the school's remote learning and homework setting platform and data storage platform;
- Wonde, as a secure data transfer portal;
- Accessit, the school's Library management solution.

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

- our local authority Hertfordshire County Council;
- a student's home local authority (if different);
- the Department for Education (DfE);
- school governors / trustees;
- 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, Zurich / the Risk Protection Arrangement;
- our auditors, Buzzacott;
- Welwyn and Hatfield Consortium Schools (Bishop's Hatfield Girls' School, Monk's Walk School, Ridgeway Academy, Stanborough School) for post 16 students;
- Links (formerly The Park) Educational Support Centre.

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- Schools within the Danes Educational Trust (St Clement Danes School, Croxley Danes School, Chancellor's School, De Havilland Primary School, Elstree Screen Arts Academy, Lanchester Primary School, Ascot Road Primary School and Jupiter Primary School);
- Papercut, the school's printer management system;
- SOCS, the school's communications system for sports clubs and fixtures;
- Evolve, for the management of school trips and visits;
- Applica, for processing admissions and bursaries;
- Police CyberAlarm, the school's detection system to identify and mitigate its cyber risks;
- Tute, for online educational provision.

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

We may also share your data with a number of providers of software tools which may be used to: support student learning; monitor and report on student attainment and progress; deliver the educational curriculum; ensure the safety and wellbeing of students; communicate with parents; or to carry out other operational processes to support our core activities as a public authority, under Article 6(e) of the UK GDPR. These providers act as data processors on our behalf, and are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow them to use your personal data for their own purposes, and we only permit them to process your personal data for specified purposes and in accordance with our instructions.

In the event that we share personal data about students with third parties or data processors, we will provide the minimum amount of personal data necessary to fulfil the purpose for which we are required to share the data. Where necessary, we will carry out a Data Protection Impact Assessment (DPIA) to assess any risks involved.

8. DATA SECURITY

We have put in place measures to protect the security of personal information.

Third parties who are processing personal data on our behalf will only process personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to personal information to those third parties who have a business need to know. They will only process personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

9. RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes.

Under certain circumstances, by law you have the right to:

- **Request access to your personal information:** 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 personal data contact the school's DPO.

The legal timescales for the School to respond to a Subject Access Request is one calendar month. As the School has limited staff resources outside of term time, we encourage parents / carers to submit Subject Access Requests

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 Subject Access Requests, please see the DET Data Protection Policy.

- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the DPO in writing.

10. FEE

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

11. WHAT WE MAY NEED FROM YOU

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your 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.

You 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.

We will always seek to comply any requests regarding your rights, however please note that we may still be required to hold or use your information to comply with legal duties.

For further information about your rights, including the circumstances in which they apply, see the [guidance](#) from the Information Commissioners Office (ICO) on individuals' rights under the UK GDPR.

If you have a concern 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/>.

12. RIGHT TO WITHDRAW CONSENT

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the school's DPO.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

13. COMPLIANCE

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, Sarah Millhouse: email DPO@onslow.herts.sch.uk / telephone 01707 264228.

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. SK95AF.

14. CHANGES TO THIS PRIVACY NOTICE

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