



Holy Family Catholic Primary and Nursery School

Privacy notice for parents and carers – use of your personal data

Change No	Date	Details	By
1	1/3/2021	To include digital learning	VE

Review by GB Bi AnnualAgreed 23rd June 2021

1. Introduction

Under data protection law, individuals have a right to be informed about how our 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 **parents and carers of pupils at our school**.

We, Holy Family Catholic Primary and Nursery School are the 'data controller' for the purposes of data protection law.

Our data protection officer is Vanessa Edwards (see 'Contact us' below).

2. The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details and contact preferences (such as your name, address, email address and telephone numbers)
- Characteristics, such as ethnic background, eligibility for free school meals
- Bank details
- Details of your family circumstances
- Employment details
- Details of any support provided, including care packages, plans and support providers
- Details of any safeguarding information including court orders or professional involvement
- Records of your correspondence and contact with us
- Details of any complaints you have made
- Details to help deliver home learning
- Information from other schools

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- Any health conditions you have that we need to be aware of, disability and access requirements
- Photographs and CCTV images captured in school
- Your religion, as part of our admission arrangements and as a faith school

We may also hold data about you that we have received from other organisations, including other schools and social services.

3. Our lawful basis for using this data

Our lawful bases for processing your personal data for the purposes listed in section 3 above are as follows:

Legal Obligation LO

Where the School needs to use your information in order to comply with a legal obligation, for example to report a safeguarding concern. We may disclose to third parties.

Necessary for contract CT

We will need to use your information in order to perform our obligations under any contract ie tickets to an event.

Vital Interests

In limited circumstances we may use your information to protect your vital interests ie you are hurt

Public Interest and Substantial Public Interest PI SPI

Providing an education, safeguarding and promoting your and your child's welfare facilitating the operation of the school and compliance with legal obligations.

Substantial Public Interest for special categories of data for example we may use medical information about you when looking after your child.

Legitimate Interests LI

Using your information where it is necessary for the School's legitimate interest.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

Social protection and social security laws ESP

The School will use your information for example to provide your child with free school lunches if applicable.

Legal Claims LC

We are allowed to use your information if this is necessary in relation to our legal claims

Medical Purpose MP

This includes medical treatment

4. Why we use this data

We use the data listed above to:

- a) Provide your child with an education and to contact you accordingly
- b) Report to you on your child's attainment and progress
- c) Keep you informed about the running of the school (such as emergency closures) and events
- d) Process payments for school services and clubs and receive information
- e) Provide appropriate pastoral care
- f) Protect pupil welfare
- g) Administer admissions waiting lists
- h) Assess the quality of our services
- i) Carry out research
- j) Comply with our legal and statutory obligations
- k) To enable live lessons and deliver online learning

We may take photographs and videos of you at School events to use on social media and on the School's website. This is to show prospective parents and pupils what we do here and to advertise the school. We may continue to use these photographs and videos after your child has left the School.

4.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

4.2 Use of your personal data in automated decision making and profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

4.3 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you are physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you are physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

5. Collecting this data

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Other Schools
- Government departments or agencies
- Your children
- Police forces, courts, tribunals

6. How we store this data

We keep personal information about you while your child is attending our school. We may also keep it beyond their attendance at our school if this is necessary. Our Retention of Records Policy sets out how long we keep information about parents and carers. Please contact admin@holyfamily.swindon.sch.uk for a copy of this policy if required.

We have put in place appropriate security measures to prevent your personal information being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it.

7. Who we share data with

We do not share information about you 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 you with:

- In accordance with our legal obligations, we will share information with local authorities, Ofsted and the Department of Education, for example, where we have any safeguarding concerns or to comply with our legal obligations. LO, PI, SPI,ESP
- On occasion, we may share your information with the police for the prevention and investigation of crime and the prosecution of offenders. We will only do this in specific circumstances to assist the police with their investigations. LO,PI,SPI
- We may need to share information about you with the Health and Safety Executive if there is a health and safety issue at school. Also with other third parties if there is an emergency, for example, if you are hurt whilst on our premises. LO, PI,SPI
- Another school if we need to provide that school with information about you for example contact details and information if there have been any safeguarding concerns or SEN needs. LO,PI,SPI
- Where appropriate, we may share information about you with other people who look after your child, such as another parent or step-parent. For example, where this is part of our obligation to take care of your child or part of our wider legal and regulatory obligations. LO,PI,SPI
- In certain circumstances, we may need to share information with our legal, professional and financial advisers for the purposes of obtaining advice, complying with regulations and representation. LO,PI,SPI,LC
- Financial organisations such as our Insurance Company for example if there was an incident at school. PI,SPI,LO
- Survey and research organisations, for example asking information on services provided. PI, LI
- Where appropriate we share information with Health authorities and social welfare organisations as part of primary checks and vaccinations. .LO.PI,SPI,VI, MP
- Security organisations which look after our CCTV and intruder call out services to ensure our site is safe. PI,SPI, CT
- Charities and voluntary organisations that provide services to the school. PI,LI,CT
- The providers of our digital educational platforms to enable digital learning. LO, PI,SPI
- The providers of our digital safeguarding software. LO, PI,SPI,VI,MP
- Our IT consultants who might access information about you when checking the security of our IT network. LO, PI,SPI

7.1 Transferring data internationally

We may share personal information about you with international third parties outside of the European Economic Area, where different data protection legislation applies.

Where we transfer your personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

8. Your rights

8.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- 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
- 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

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

8.2 Your other rights regarding your data

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your personal data for 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 to restrict processing
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

9. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

10. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

- Vanessa Edwards email DPO@holyfamily.swindon.sch.uk