



# Carlisle & Hampton Hill Federation



## PRIVACY NOTICE FOR PARENTS/CARERS USE OF YOUR DATA

This policy was reviewed:	<b>November 2023</b>
This policy was ratified by Full Governing Body (if applicable):	Not applicable
This policy will be reviewed again:	<b>November 2024</b>
Governor committee responsibility:	A & F Committee
Statutory Policy:	No

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# 1. Introduction

Under UK data protection law, individuals have a right to be informed about how we use any personal data that we hold about them. We comply with this right by providing 'privacy 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 schools**.

We;

- Carlisle Infant School, Broad Lane, Hampton, TW12 3AJ, 020 8979 2770
- Hampton Hill Junior School, (HHJS) St James's Avenue, Hampton Hill, TW12 !HW, 020 8979 3019

are the 'data controller' for the purposes of UK data protection law.

- Our Data Protection Officer is Sataswana

Suite G12 Ferneberga House  
Alexandra Road,  
Farnborough,  
Hampshire,  
GU14 6DQ

01252 759177

info@satswana.com

# 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 name, address and telephone numbers)
- Bank details
- Details of your family circumstances
- Details of any safeguarding information (such as court orders and professional involvement)
- Records of your correspondence and contact with us
- Details of any complaints you have made
- National Insurance Number, DOB of parents and full name of parents

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

- Medical information (any health conditions that we need to be aware of)
- Photographs and CCTV images (HHJS only) captured in school.
- Characteristics (such as ethnicity, language and free school meals eligibility)
- If a parent applies to become a parent volunteer in school we will collect additional data such as date of birth, address history and previous names in order to carry out a Disclosure and Barring Service Check

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

### 3. Why we use this data

We use the data listed above to:

- a) Make contact in the event of an emergency
- 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) Keep you informed of extra-curricular events including events run by the Carlisle School Association (CSA), our school PTA
- e) Process payments for school services, clubs and trips
- f) Provide appropriate pastoral care
- g) Protect pupil welfare
- h) Keep track of how well we are performing and assess the quality of our services
- i) Administer admissions waiting lists
- j) Meet the statutory duties placed on us (official data collections)
- k) Comply with the law regarding data sharing
- l) Carry out research
- m) To check eligibility for Free School Meals.

#### 3.1 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 parents/carers.

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).

#### 3.2 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. Our lawful basis for using this data

Data Protection law requires us to have a lawful reason ('lawful basis') for processing the personal data we use. These reasons are listed under Article 6 of the 'General Data Protection Regulation' (GDPR). Our lawful basis for processing will be explained at the point at which we collect personal information unless there is a lawful reason not to do so (for example where it is for the prevention or detection of crime).

Carlisle Infant School and Hampton Hill Junior School process a wide range of personal data for a variety of purposes. The lawful bases we rely on will therefore vary. However, generally, the lawful bases we mainly use in relation to parents and carers are:

- **We need to comply with the law (we have a legal obligation):** For example we collect and use personal data under legal and statutory obligations within the Education Act 1996, The Children Act 2004; Education and Inspections Act 2006; Education Act 2011; the Family and Children Act 2014 and Keeping Children Safe in Education (KCSIE) statutory guidelines.
- **We need to carry out a task in the public interest:** For example, the collection and use of personal data is necessary for us to perform our role as a school and to deliver our public task of providing education to our pupils.

Less commonly, we may also need to use personal information where:

- You have given us your consent.
- We need to protect your vital interests (or someone else's interests). This relates to life and death situations.
- It is in ours or a third party's legitimate interests to process the data. Where this is the case we will ensure that we have considered whether or not our legitimate interests are overridden by your rights and freedoms.

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 go about withdrawing consent if you wish to do so. We will then cease this aspect of processing, unless another lawful basis applies.

Some of the reasons that we use for collecting and using information may overlap and there may be several grounds allowing us to use personal data. There are also other lawful bases that may apply and this will be made clear wherever possible.

#### **4.1 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 UK 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're 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 under Keeping Children Safe in Education legislation
- 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 UK 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 child's life or someone else's life), in situations where you're 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
- Government departments or agencies
- Your child(ren)
- Police forces, courts, tribunals

## 6. How we store this data

We keep personal information about you while your child(ren) are attending our schools. We will dispose of your personal data securely when we no longer need it.

We may also keep it beyond their attendance at our schools if this is necessary. This will be done in accordance with the guidance provided in the [Information Management Society's toolkit for schools](#).

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

## 7. Who we share your data with

Information about parents and carers will not be shared with any third party without consent unless the law and/or our policies allows us to do so. Where it is legally required or necessary (and it complies with UK data protection law) personal information may be shared with the relevant local authority to meet our legal obligations to share information such as safeguarding concerns or with the Department for Education (DfE). To find out more about the data collection requirements that are placed upon us by the DfE including the data that we share with them go to: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

Where it is legally required or necessary (and it complies with UK data protection law), we may share personal information about you/your family with:

- Our local authority – London Borough of Richmond – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Government departments or agencies, schools may be required to pass on data in order to help the government monitor the educational system and enforce laws relating to education
- Our regulator, e.g. Ofsted
- Suppliers and service providers, to enable them to provide the service we have contracted them for, e.g. catering
- Financial organisations, to enable them to provide the service we have contracted them for, e.g. meals, school trips, clubs and afterschool care payments
- Health authorities, as obligated under health legislation
- Health and social welfare organisations, in order to protect or maintain the welfare of our pupils, and in cases of child abuse, it may be necessary to pass personal data on to social workers and/or support agencies
- Professional advisers and consultants, in order to protect the welfare of our pupils
- Police forces, courts, tribunals
- Other schools, if a pupil transfers to another school, data that relates to their parents and carers will be forwarded on to the new school. This will support a smooth transition from one school to the next.

## **7.1 Transferring data internationally**

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law and ensure that we have sufficient safeguards in place.

## 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 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 format within one month, unless an extension is necessary on the grounds of the complexity of the request

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 the Data Protection Officer (see 'Contact us' below).

### 8.2 Your other rights regarding your data

Under UK 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
- › In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- › Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- › 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 the Data Protection Officer (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:

Our Data Protection Officer is Sataswana

Suite G12 Ferneberga House  
Alexandra Road,  
Farnborough,  
Hampshire,  
GU14 6DQ

01252 759177

[info@satswana.com](mailto:info@satswana.com)