

CLOCKHOUSE PRIMARY SCHOOL



Privacy Notice for Parents / Carers - Use of your personal data

Under data protection law, individuals have a right to be informed about how the 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 **you**.

Clockhouse Primary School is the 'data controller' for the purposes of data protection law.

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
- bank details
- photographs
- CCTV images captured in school

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable) :

- characteristics such as ethnicity, languages spoken and eligibility for certain benefits
- family circumstances
- physical and mental health, including medical conditions
- support received, including care packages, plans and support providers

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

Why we use this data

We use this data to :

- report to you on your child's attainment and progress
- keep you informed about the running of the school (such as emergency closures) and events
- process payments for school services and clubs
- provide appropriate pastoral care
- protect pupil welfare
- administer admissions waiting lists
- assess the quality of our services
- carry out research
- comply with our legal and statutory obligations
- contact you, or designated emergency contacts, when we need to do so

Our legal basis for using this data

We only collect and use your personal data when the law allows us to. Most commonly, we process it where :

- we need to comply with a legal obligation
- we need it to perform an official task in the public interest
- we need to fulfil a contract we have entered into with you

Less commonly, we may also process your personal data in situations where :

- we need to protect an individual's vital interests (protect their life)
- we have obtained consent to use it in a certain way
- we have legitimate interests in line with reasonable expectation

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 consent can be withdrawn if you wish to do so.

Some of the reasons listed above for collecting and using your personal data overlap, and there may be several grounds which justify our use of your data.

Collecting this information

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 will 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.

How we store this data

We keep personal information about you while your child is attending our school for as long as is necessary. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. Our Record Retention Policy/Schedule is currently being updated to set out how long we keep information about parents and carers, and will be in line with the [*Information and Records Management Society's toolkit for schools*](#). We will notify you when this document has been updated and posted on the school website.

Data Sharing

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 :

- our local authority, the London Borough of Havering - to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
- Government departments or agencies - our legitimate interests to check eligibility for Pupil Premium funding
- our regulator, Ofsted
- suppliers and service providers (where necessary) - to enable them to provide the service we have contracted them for such as access to online educational resources
- financial organisations - in the legitimate interests of your child to enable the ordering of school dinners via sQuid
- health authorities - where it is deemed there is a vital interest for your child's wellbeing

- health and social welfare organisations - to meet our legal obligations to share certain information with them, such as safeguarding concerns
- professional advisers and consultants - where this is for the purposes of legitimate tasks, such as supporting your child's wellbeing
- police forces, courts, tribunals - to meet our legal obligations to share certain information with them, such as safeguarding concerns

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law. This will only occur if your child transfers to a school outside the EEA.

Parents' rights regarding personal data

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- 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
- give you a copy of the information within 30 days

Please be aware that it may be difficult to meet the 30 day timescale if a subject access request is received during school holidays, or the 30 day period overlaps a school holiday period.

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a subject access request, please contact the School Office or the school's Compliance Officer, Mrs Lowe (*see contacts below*).

Other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to :

- object to the use of personal data if it would cause, or is causing, damage or distress
- prevent it being used to send direct marketing
- object to 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 restrict processing
- claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact the school's Compliance Officer, Mrs Lowe (*see contacts below*).

Data Breaches

Any data breaches that may occur are notified to the school's Data Protection Officer (DPO), Mrs Barton (*see contacts below*), who is independent of the school. The DPO will document and record all breaches, and will assess the potential consequences of any breach, based on how

serious they are, and how likely they are to happen. The DPO will also consider whether the breach must be reported to the Information Commissioner's Office (ICO). If a breach affects your personal data, and is serious enough to be reported to the ICO, the DPO will inform you immediately, in writing. Where data breaches are to be notified to the ICO, the DPO must do so via the ICO website within 72 hours of the breach being reported. The DPO works with the school and Headteacher to review all data breaches, and how they can be prevented from happening again.

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 by contacting the school's Compliance Officer, Mrs Lowe (*see contacts below*).

To make a complaint, please contact the Headteacher, Mrs Savidge.

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

- reporting a concern online at <https://ico.org.uk/concerns/>
- telephoning 0303 123 1113
- writing to :
Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this Privacy Notice, please contact the Headteacher, Mrs Savidge, or the school's Compliance Officer, Mrs Lowe.

- The school's Headteacher is Mrs J Savidge
email office@clockhouse.havering.sch.uk
- The school's Compliance Officer is Mrs Lowe
email finance@clockhouse.havering.sch.uk
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- The school's Data Protection Officer is Mrs R Barton
email DPO@clockhouse.havering.sch.uk

This notice is based on the [Department for Education's model privacy notice](#) for pupils, amended for parents and to reflect the way we use data in this school.