Brighter Futures
Educational Trust

PRIVACY NOTICES PARENTS AND 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 STUDENT PARENTS AND CARERS INFORMATION

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

g) Where we have the consent of the data subject (Article 6 (a));
h) Where it is necessary for compliance with a legal obligation (Article 6 (c));
i) Where processing is necessary to protect the vital interests of the data subject or another person (Article 6(d));
j) 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 datasubject 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 the2018 Data Protection Act) (Article 9 (2)(g)).

3. STATUTORY FUNCTIONS

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

a) To decide who to admit to the schools.
b) Support student learning.
c) Monitor and report on student progress.
d) Provide appropriate pastoral care.

e) Assess the quality of our services.
f) Comply with the law regarding data sharing.
g) For the protection and welfare of students and others in the schools, including our safeguarding/ child protection obligations.
h) For the safe and orderly running of the schools.
i) Promote the schools.
j) Send you communications that may be of interest to you which may include information about school events oractivities, news, campaigns, appeals, other fundraising activities.
k) To respond to investigations from our regulators or to respond to complaints raised by our stakeholders.

In connection with any legal proceedings threatened or commenced against the schools.

4. PARENT AND 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 AND 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.

6. STORING PARENT AND 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.

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 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 are available from the school's DPO, Carole Connelly. 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:

- Schools that students attend after leaving us.
- BehaviourWatch, so that we can communicate with you via text message in case of an accident.
- Online information platforms that allow for school- home communication.
- Online payment systems so that you can pay for school lunches and visits/trips.
- The schools' 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 and Microsoft platforms, the schools' learning, remote learning and homework setting platforms and data storage platforms.
- Wonde, as a secure data transfer portal.

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)
- Trustee and Governors
- The police and law enforcement agencies.
- NHS health professionals including a school nurse and 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 informationin these circumstances.
- Our legal advisors.

In the event that we share personal data about students, parents and carers with third parties or data processors, we will provide the minimumamount 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 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 yourpersonal 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 relevant school to respond to a Subject Access Request is one calendar month. As the schools have 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 schools are closed or are 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 forprocessing 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. FEES

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 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 damage caused by a breach of our data protection responsibilities.

We will always seek to comply with 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 anytime. To withdraw your consent, please contact the schools' 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 Carole Connelly : email carole@schooldposervice.com

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.