Roydon Primary School

General Data Privacy Notice

[Version 2020 v3.3]

If you are reading a printed version of this document, you should check the policy section on the school website to ensure that you have the most up-to-date version.

If you would like to discuss anything in this privacy notice, please contact:

Data Protection Officer: Data Protection Education Ltd

Telephone: 0800 0862018

Email: dpo@dataprotection.education

If you would like a copy of any documentation, please contact the school office:
office@roydon.norfolk.sch.uk

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Purpose of this document

Roydon Primary School is a data controller. This notice explains how we collect, use, store and share personal information about parents, carers, visitors, volunteers and other individuals who contact us or use our services, such as contractors, suppliers, community users and people making enquiries or complaints. Separate notices cover pupils, employees and applicants, and governors, trustees and other governance role holders. As data controller, we decide what information is collected and how it is processed.

Under the Data Protection Act 2018 and the UKGDPR, we must abide by the principle of transparency and the right of data subjects to be informed about how their data is processed.

This document provides such information. It will be updated from time to time, and updates will be communicated to the relevant data subjects.

It is your duty to inform us of changes.

Categories of data subject, the data we collect and hold and why we use this data

While most personal information is required, some may be requested on a voluntary basis. To comply with UK GDPR, we will explain at the point of collection whether information is required, the relevant statutory or contractual requirement, the possible consequences of not providing it, and whether you have a choice.

The categories of other information that we collect, hold and share include:

Parents' and carers' information

Parent or carer information is collected so that:

- We can communicate with you about your child in relation to things such as education and attainment, health and well-being, attendance and behaviour and emergencies (task in a public interest or legal obligation)
- Send you important information about the school (task in a public interest)
- Provide you with access to tools and services we use in schools such as parent payment systems, communication applications (task in a public interest or to fulfil a contract)

Data collected includes:

- Name
- Address
- Contact information
- Relationship to the child
- Involvement with volunteer groups or parents association
- Driving licence, passport or other official documentation for identity verification

We may use your name, contact details and communication preferences to promote school/trust events, services, campaigns or fundraising. We rely on Article 6(1)(a) UK GDPR (consent), or, where appropriate and outside our public tasks, Article 6(1)(f) (legitimate interests), following a balancing assessment.

We comply with the Privacy and Electronic Communications Regulations 2003 (PECR). We send unsolicited marketing emails or texts to individual subscribers only with valid consent or where all requirements of an applicable PECR soft opt-in are met. We identify ourselves and provide a simple, free way to unsubscribe in

each message. You have an absolute right to object to direct marketing, including related profiling, at any time, and may withdraw marketing consent at any time by using the unsubscribe option or contacting us using the details on the first page. We will stop using your information for direct marketing when you object.

Visitor information

Visitor information is collected so that:

- We have a record of who is and has been in the building, for health, safety and operational purposes (legal obligation)
- We have a record of official visits, such as inspections or maintenance (task in a public interest)
- Where needed, Disclosure and Barring Service checks may take place (task in a public interest or legal obligation)

Data collected includes:

- Name
- Associated business
- Purpose of visit

Visitor information is collected to manage access to the school site and support safeguarding arrangements. Information is held only while a visitor is on site and is automatically removed when the visitor signs out.

Volunteers' information

Volunteer information is collected so that:

- We have a record of who is and has been in the building, for health, safety and operational purposes (task in a public interest);
- Disclosure and Barring Service checks may be carried out where necessary (public task or legal obligation); and
- We have a record of visits (task in a public interest).

Data collected includes:

- Name;
- Address;
- Contact information;
- Disclosure and Barring Service check results;
- CCTV images, visit dates and times, sign-in and access-control records;
- Accident, injury, incident or safeguarding information, including relevant health information, where applicable; and
- Volunteer applications, references, suitability checks, roles, training and attendance records, where applicable.

Across the groups covered by this notice, relevant CCTV, access and incident information is used for safeguarding, site security, health and safety, emergency response and investigating incidents. We rely on Article 6(1)(e) UK GDPR for these public functions and Article 6(1)(c) where a specific legal obligation requires processing. Our CCTV policy explains operation of the systems. [Retain only the systems and data categories used and complete Appendix A.]

The lawful basis on which we process this information

We collect and process your information:

- Under Article 6(1)(e) UK GDPR, where processing is necessary to perform a task in the public interest or exercise official authority vested in us;
- For special category data, under a specific condition in Article 9 UK GDPR and, where required, an applicable condition in Schedule 1 of the Data Protection Act 2018;
- Under Article 6(1)(d) UK GDPR, where processing is necessary to protect someone's vital interests;
- Under Article 6(1)(b) UK GDPR, where processing is necessary for a contract with you or to take steps at your request before entering into a contract;
- Under Article 6(1)(a) UK GDPR, where you have given valid consent for a specific purpose;
- Under Article 6(1)(f) UK GDPR, where processing is necessary for our legitimate interests or those of a third party, except where this relates to performance of our public tasks, and subject to an appropriate balancing assessment;
- For necessary DBS and criminal-offence suitability information concerning visitors or volunteers, we rely on Article 6(1)(c) UK GDPR where a statutory duty applies or Article 6(1)(e) for necessary safeguarding public tasks. We also meet Article 10 UK GDPR and section 10(5) of the Data Protection Act 2018 through Schedule 1, Part 2, paragraph 6 (statutory and government purposes), where its requirements, including substantial public interest, are met. We maintain an Appropriate Policy Document. Checks are limited to those for which the role is legally eligible.
- Under Article 6(1)(c) UK GDPR, where processing is necessary to comply with a legal obligation.

Our basis for using **Special Category Data under Article 9** of the UKGDPR will only be when we have both a lawful basis as set out above and under the following legal grounds, in accordance with the Data Protection Act (2018), Schedule 1:

- Where we have obtained your explicit consent to use your data in a specific way;
- When we need to perform or exercise an obligation or right in relation to employment, social security or social protection law;
- When we need to protect an individual's vital interest (i.e. protect your life or someone else's life) in situations where you are physically or legally incapable of giving your consent;
- Where the data concerned has already been made manifestly public by you;
- When we need to process it for the establishment, exercise or defence of legal claims;
- Where we need to process it for reasons of substantial public interest as defined in legislation;
- When 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 care work professional or by any other person obliged to do so, confidentiality under law;
- Where we need to process it for public health reasons and the processing is done by/or under direction of a health or social care work professional or by any other person obliged to do so confidentiality under law; and
- Where we need to process it for archiving purposes, scientific or historical researching purposes or for statistical purposes and processing is in the public interest.
- Where you have provided us with consent to process your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and will explain how to withdraw your consent if you wish to do so.

Legitimate interests

Outside the performance of our public tasks, we may rely on Article 6(1)(f) UK GDPR where processing is necessary for legitimate interests and those interests are not overridden by your interests, rights and freedoms.

This may include processing necessary for:

- network and information security;
- fraud prevention and the prevention of unauthorised access;
- safeguarding and security monitoring;
- internal administrative purposes;
- ensuring the safety and integrity of school/trust systems and services; and
- responding to complaints, incidents or legal claims.

Where legitimate interests are relied upon, we will consider and balance any potential impact on individuals and ensure that processing remains lawful, fair and proportionate.

For activities forming part of our public tasks, including statutory safeguarding, we rely on Article 6(1)(e) or, where a specific legal obligation applies, Article 6(1)(c). Recognised legitimate interest under Article 6(1)(ea) is a separate basis restricted to Annex 1 purposes and is not available to public authorities performing their official tasks.

Automated processing and digital systems

We may use secure digital and AI-assisted systems to support communication, safeguarding, administration and operational functions.

These systems are used with appropriate human oversight and safeguards. Where digital platforms or AI-assisted tools are used for school operations, they may include integrated filtering and monitoring functionality to ensure the safety and integrity of school systems. We do not make solely automated decisions about individuals that would produce legal or similarly significant effects unless authorised by law.

Collecting this information

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

- **Parents:** whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain information to us or if you have a choice in this;
- **Visitors and volunteers:** if you do not provide information necessary for identification, site security or safeguarding checks, we may be unable to allow access to the site, approve a volunteering application or permit particular activities. We will explain what information is required and why. Refusing optional information will not, by itself, prevent access or volunteering.

Storing this information

We hold data securely for the periods, or in accordance with the criteria, set out in our data retention schedule. The current schedule and information about how we keep data safe are available from the school office.

Who we share this information with

We do not share personal information about individuals with anyone unless the law and our policies allow us to do so, or where consent has been provided where required.

Depending on the purpose of processing, information may be shared with:

- members of school/trust staff and authorised professionals;
- local authorities, safeguarding partners and other public bodies;
- third-party processors and service providers acting on our behalf, including providers of educational technology, communication, safeguarding, security and cloud-based services;
- health, welfare and support services where necessary to support wellbeing or safeguarding;
- regulators, auditors, insurers and legal advisers;
- law enforcement agencies, courts or tribunals where required or permitted by law; and
- contractors or external agencies involved in health and safety, site security or operational support.

We may also process limited technical and usage information in order to maintain the security of our systems, networks, devices and services, including detecting unauthorised access, malicious activity, safeguarding risks or misuse of school systems.

Parents and Carers

We may share parent and carer information with staff, partner agencies and contracted service providers where necessary to support the education, safety, wellbeing and administration of the school/trust, or to facilitate services and systems used by us.

Visitors and Volunteers

Visitor and volunteer information may be shared where necessary for safeguarding, health and safety, site security, incident management, legal compliance or the prevention and detection of crime.

Where third-party providers process personal information on our behalf, we require them to process data only in accordance with our instructions and in compliance with UK data protection law.

Some service providers may process personal information outside the United Kingdom. Where this occurs, we will identify the destination and use an applicable transfer mechanism, such as UK adequacy regulations, the UK International Data Transfer Agreement or the UK Addendum to approved contractual clauses. Information about the applicable safeguard, and how to obtain a copy, is available from the Data Protection Officer.

Information may also be shared without consent where this is lawful and necessary to safeguard children or vulnerable individuals, prevent harm, investigate concerns or fulfil statutory duties.

Your rights

Your rights depend on our purpose and lawful basis for processing and are not all available in every circumstance. Where applicable, you have the following rights:

- Right of access
- Right of erasure
- Right of rectification
- Right to object to processing
- Right to be informed

- Right to data portability
- Right not to be subject to decisions based on automated decision making
- Right to restrict processing

If you have a concern or complaint 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 (ICO) at Information Commissioner's Office.

Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the Data Protection Officer (DPO) using the contact details on the front of this notice.

Concerns about how your personal data is handled

If you have any concerns about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance using the contact information on the first page of this document.

If you wish to make a complaint about how we have used your personal information, please contact the Data Protection Officer using the details on the first page or submit it electronically using [insert email address or web form]. We will acknowledge receipt within 30 days and take appropriate steps to investigate and respond without undue delay. You also have the right to complain to the Information Commissioner's Office at https://ico.org.uk/make-a-complaint/data-protection-complaints/. You may contact the ICO without first completing our complaints process.

Our data protection complaints procedure is available on the school website. It explains how to complain, including electronically, and the response times. We will acknowledge receipt within 30 days, investigate without undue delay, keep you informed of progress and communicate the outcome without undue delay. The 30-day period is for acknowledgement, not a fixed deadline for the final response.