

# Privacy notice for parents and carers – your personal data

## 1 Introduction

Under UK data protection law, individuals have a right to be informed about how the Frays Academy Trust 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**.

We, the Frays Academy Trust, are the ‘data controller’ for the purposes of UK data protection law. Our contact details are: Frays Academy Trust, c/o Cowley St Laurence CE Primary School, Worcester Road, Cowley, Uxbridge, UB8 3TH, 01895 59 00 59, [office@fraysacademytrust.org](mailto:office@fraysacademytrust.org).

Our schools are:

- All Saints CE Primary School
- Beechwood Primary School
- Cowley St Laurence CE Primary School
- Keep Hatch Primary School
- Laurel Lane Primary School
- St Matthew’s CE Primary School
- St Martin’s CE Primary School

Our data protection officer is SchoolPro (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)
- Bank details
- Details of your family circumstances
- 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

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
- Photographs and CCTV images captured in school
- For our church schools: your religion, as part of our admission arrangements

We may also hold data about you 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:

- Provide your child with an education and 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

### **4 Our lawful basis for using this data**

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Carry out a task in the public interest
- Comply with a legal obligation

Less commonly, we may also use personal information about your child where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's)
- There is a legitimate interest to share the information.

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.

For 'special category' and criminal offence data, we only collect and use it when we have both a lawful basis, as set out above, and one or more of the conditions for processing as set out in UK data protection law.

### **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
- Police forces, courts, tribunals

### **6 How we store this data**

We keep personal information about you while your child is at our school. We may also keep it beyond their time at our school if this is necessary. Our record retention schedule sets out how long we keep information about parents and carers. You can access this on request by contacting us.

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. 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 UK data protection law), we may share personal information about you with:

- Our local authorities – the London Borough of Hillingdon or Wokingham Borough Council depending on the school your child attends – to meet our legal obligations to share certain information with them, such as safeguarding concerns
- Government departments or agencies
- Our regulators, Ofsted, the Education and Skills Funding Agency (ESFA) and the Regional Schools Commissioner
- Suppliers and service providers such as our catering contractor
- Financial organisations
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

### **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. In cases where we have 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 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:

- Be informed about the collection and use of your personal data
- 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 us (see 'Contact us' below).

There are legitimate reasons why your information rights request may be refused. For example, some rights will not apply:

- Right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- Right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- Right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent.

## 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**: SchoolPro, Midway House, Herrick Way, Staverton Technology Park, Staverton, Cheltenham, Gloucestershire, GL51 6TQ, email: [dpo@schoolpro.uk](mailto:dpo@schoolpro.uk) or telephone: 0203 2909 093.

In addition, our Headteachers have day-to-day responsibility for data protection issues in our schools. If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, you can also contact them via the appropriate school office.

## 11 Data collection requirements

To find out more about the data collection requirements placed on us by the Department for Education (DfE) (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

## **12 Sharing by the Department for Education (DfE)**

DfE will only share personal data where it is lawful, secure and ethical to do so. Where these conditions are met, the law allows the Department for Education (DfE) to share personal data with certain third parties, including:

- Schools and local authorities
- Researchers
- Organisations connected with promoting the education or wellbeing of children in England
- Other government departments and agencies
- Organisations fighting or identifying crime

For more information about the Department for Education's (DfE) data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

Organisations fighting or identifying crime may use their legal powers to contact the Department for Education (DfE) to request access to individual level information relevant to detecting that crime. For information about which organisations the Department for Education (DfE) has provided information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the Police please visit the following website:

<https://www.gov.uk/government/publications/dfe-external-data-shares>

## **13 How to find out what personal information the Department for Education (DfE) holds about you**

Under the terms of the UK GDPR, you are entitled to ask the Department for Education (DfE):

- If they are processing your personal data
- For a description of the data they hold about you
- The reasons they're holding it and any recipient it may be disclosed to
- For a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department for Education (DfE), you should make a 'subject access request'. See the guide for details:

<https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

Further information on what personal information the Department for Education (DfE) holds about you published in the privacy notices for early years foundation stage to key stage 3. These are available below:

<https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3>

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>