PRIVACY NOTICE FOR PARENTS OF PUPILS ATTENDING RYE COMMUNITY PRIMARY SCHOOL (the Academy)

PART OF THE AQUINAS CHURCH OF ENGLAND EDUCATION TRUST (The Trust)

The Trust and the Academy collects a lot of data and information about pupils attending the Academy so that it can run effectively as a school and so the Trust can meet its responsibilities as the admission authority. As a result, it is necessary to collect personal data from you as the parent(s) of a registered pupil at the Academy. This privacy notice explains how and why we collect your data, what we do with it and what rights you have in relation to the personal data and information collected.

Privacy Notice (How we use your information)

We are a primary academy and part of the Trust, which is the data controller for the purposes of General Data Protection Regulation (GDPR) and Data Protection Act 2018 (DPA). The Trust is a charitable company limited by guarantee under company number 07525735. The Trust's offices are at Magpie Hall Lane, Bromley BR2 8HZ. For further information of the Trust please see www.aquinastrust.org.

As the legal entity responsible for the Academy, the Trust acknowledges its obligations under the GDPR to parents of pupils registered at the Academy in respect of your personal data and is committed to the principles of data protection as detailed in the Trust's Data Protection Policy.

Why do we collect and use your personal information?

We collect and use your personal information under the following lawful bases:

a. where we have the consent of the data subject (Article 6 (a));
b. where it is necessary for compliance with a legal obligation (Article 6 (c));
c. where processing is necessary to protect the vital interests of the data subject or another person (Article 6(d));
d. 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 you is sensitive personal data, we will only process it where:

a. we have explicit consent;
b. processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent; and / or
c. processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject. In addition, the processing satisfies one of the requirements of 1 Part 2 of the DPA.

Please see our Data Protection Policy for a definition of sensitive personal data.

We use your personal data to support our statutory functions of running a school and in relation to our responsibilities in terms of your children, in particular:

a. to support pupil learning;
b. to monitor and report on pupil progress;
c. to provide appropriate pastoral care;
d. to assess the quality of our services;
e. to comply with the law regarding data sharing;
f. for the protection and welfare of pupils and others in the school;
g. for the safe and orderly running of the school;
h. for the administration and business functions of the Academy.

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

a. Personal information (such as name, address, contact details and place of work);
b. Parent details (such as relationship to pupil)
c. Marital status (such as divorced, separated, court order in place);
d. Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility);
e. Medical Information (such as medical conditions which may impact on your child);
f. Family circumstances (such as poor attendance, free school meals and pupil premium)

From time to time and in certain circumstances, we might also process personal data about pupils, some of which might be sensitive personal data, including information about criminal proceedings / convictions, information about sex life and sexual orientation, child protection / safeguarding. This information is not routinely collected about pupils and is only likely to be processed by the academy in specific circumstances relating to particular pupils, for example, if a child protection issue arises or if a pupil 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.

We collect information about pupils when they join the school and update it during their time on the roll as and when new information is acquired.

Collecting your information

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 the 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. Where appropriate, we will ask you for consent to process personal data where there is no other lawful basis for processing it, you may withdraw consent at any time.

In addition, the Academy also uses CCTV cameras around the school site for security purposes and for the protection of staff and pupils. CCTV footage may be referred to during the course of disciplinary procedures (for staff or pupils) or investigate other issues. CCTV footage involving will only be processed to the extent that it is lawful to do so. Please see our CCTV policy for more details.

Storing your data

We hold your data in accordance with the Trust's Document Management and Retention Policy.

A significant amount of personal data is stored electronically, for example, on our database, information management systems, finance and payroll systems and IT systems. Some information may also be stored in hard copy format.

Data stored electronically will be saved on premises as part of a Local Area Network which is supported by East Sussex County Council. The contracts with East Sussex County Council contain the necessary provisions to ensure the security of personal data.

Personal data may be transferred to other countries if, for example, your child is relocating to a different country and joining a new setting abroad your details may be transferred as a part of this process. Appropriate steps will be taken to keep the data secure.

Who do we share your information with?

Your information and data is shared with staff at the Academy and Aquinas central, where necessary.
We routinely share your information with:

- schools that your child attends after leaving us;
- our local authority, the London Borough of Bromley;
- a pupil's home local authority (if different);

From time to time, we may also share your information other third parties including the following:

- the Police and law enforcement agencies;
- health professionals including the school nurse, educational psychologists,
- Education Welfare Officers;
- Courts, if ordered to do so;
- Social Care and other external agencies;
- 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 information in these circumstances;
- our HR providers, for example, if we are seeking HR advice and a pupil is involved in an issue;
- our legal advisors;
- the Risk Protection Arrangement;
- Place2Be.

Some of the above organisations may also be Data Controllers in their own right in which case we will be jointly controllers of your personal data and may be jointly liable in the event of any data breaches.
In the event that we share personal data about you with third parties, we will provide the minimum amount of personal data necessary to fulfil the purpose for which we are required to share the data.

Why we share your information
We do not share information about you with anyone without consent unless the law allows us to do so.

Requesting access to your personal data
Under data protection legislation, you have the right to request access to information that we hold about you ("Subject Access Request"). To make a request for your personal data, contact one of the following; although any written request for personal data will be treated as a Subject Access Request.:
The Trust's Data Protection Officer: Mary Capon by writing to her at Aquinas Trust, Magpie Hall Lane, Bromley BR2 8HZ or emailing her at info@aquinastrust.org and inserting 'subject access request' in the subject box.
The Academy's Data Protection Lead: office@ryeprimary.co.uk

Subject to the section below, the legal timescales to respond to a Subject Access Request is one calendar month. As the Academy has limited staff resources outside of term time, we encourage you to submit Subject Access Requests during term time and to avoid sending a request during periods when the Academy is closed or is 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 Trust's Data Protection Policy.

You also have the right to:

- object to processing of 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 damages caused by a breach of our data protection responsibilities.

If you have a concern about the way we are collecting or using your data, you should raise your concern with us in the first instance by contacting the Trust's data protection officer or the Academy's data protection lead.

Alternatively, you can contact directly the Information Commissioner's Office at https://ico.org.uk/concerns/

Contact:

If you have any queries regarding this notice or the use of pupil personal information, please contact:

- The Trust's data protection officer, Mary Capon, who can be contacted by writing to her at The Trust's offices are at Magpie Hall Lane, Bromley BR2 8HZ, by emailing info@aquinastrust.org or calling 0203949 7000.
- Alternatively, you can contact the Rye Community Primary School by emailing office@ryeprimary.co.uk