

## Privacy notice for parents and carers – your child’s 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 **children at our schools**.

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 462 361, [office@fraysacademytrust.org](mailto:office@fraysacademytrust.org).

Our schools are:

- 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 Janette Gaffney (see ‘contact us’ below).

### 2 The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about your child includes, but is not restricted to:

- Contact details and personal information (including name, address, date of birth, unique pupil number)
- Results of internal assessments and externally set tests
- Attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- Characteristics (such as ethnicity, language, and free school meal eligibility)
- Medical information (any relevant medical conditions or treatments and a log of any incidents/illnesses that we are aware of and occurred in school, dietary requirements, doctor’s information)
- Behaviour information (record or events as per our Behaviour Policy)
- Special educational needs and disability (any record of SEND along with associated observations, strategies and plans)
- Safeguarding information (such as court orders and professional involvement)
- Information on the use of the internet and ICT resources to ensure safe and appropriate use of resources
- Photographs
- CCTV images (where this is in place)

We may also collect, use, store and share (when appropriate) information about your child that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to, information about:

- Any medical conditions we need to be aware of, including physical and mental health
- Photographs and CCTV images captured in school
- Characteristics, such as ethnic background or special educational needs

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

### **3 Why we use this data**

We use the data to provide children with an education and to:

- Monitor pupil attainment and progress
- Provide appropriate pastoral care
- Assess the quality of our services
- Keep children safe
- Meet the statutory duties placed upon us by the Department for Education

### **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 child's 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 your child is mandatory, there is some information that you can choose whether or not to provide us.

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 your child will come from you or your child, but we may also hold data about your child from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals

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

We keep personal information about your child while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary. Our records retention schedule sets out how long we keep information about your child. This is available on request (see 'contact us').

We have put in place appropriate security measures to prevent your child's personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We will dispose of your child's personal data securely when we no longer need it.

## **7 Who we share data with**

We do not share information about your child 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 your child with:

- Our local authorities (our schools are based in the London Borough of Hillingdon and Wokingham Borough Council) – to meet our legal and statutory obligations to share certain information with them – such as safeguarding concerns and information about exclusions
- The Department for Education – to meet statutory obligations to provide them with information, especially with regard to data return
- Our regulator – Ofsted – to enable it to evaluate the education we provide, which is in the public interest
- Suppliers and service providers – such as our catering provider so that they can provide the services we have contracted them for
- Financial organisations – so they can provide the services we have contracted them for
- Our auditors – to demonstrate that we have taken appropriate action in providing your child with education
- Health authorities – to comply with our legal and statutory obligations
- Security organisations – with regard to legal or safeguarding investigations and to assist in crime prevention, detection and prevention of fraud
- Health and social welfare organisations – to enable us to comply with our duty of care and statutory safeguarding duties for your wellbeing
- Police forces, courts, tribunals – in order to uphold law and order

### **7.1 National Pupil Database**

We are required to provide information about pupils to the Department for Education (a government department) as part of statutory data collections such as the school census and the early years census.

Some of this information is then stored in the [National Pupil Database](#) (NPD), which is owned and managed by the Department and provides evidence on school performance to inform research.

The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards and others.

The Department for Education may share information from the NPD with third parties, such as other organisations which promote children's education or wellbeing in England. These third parties must agree to strict terms and conditions about how they will use the data.

For more information, see the Department's webpage on [how it collects and shares research data](#). You can also [contact the Department for Education](#) with any further questions about the NPD.

## **7.2 Transferring data internationally**

Where we transfer your personal data outside the UK, we will do so in accordance with UK data protection law.

## **8 Your rights**

### **8.1 How to access personal information that we hold about your child**

You have a right to make a 'subject access request' to gain access to personal information that we hold about your child.

If you make a subject access request, and if we do hold information about your child, we will (subject to any exemptions that 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 child's 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 right to access your child's educational record**

It should be noted that the Education (Pupil Information) (England) Regulations 2005 do not apply to academies, so the rights available to parents in those Regulations to access their child's educational records are not applicable our schools. Instead, requests from parents for personal data about their child will be dealt with as a Subject Access Request.

### **8.3 Your other rights regarding your child's data**

Under UK data protection law, you have certain rights regarding how your child's personal data is used and kept safe. For example, you have the right to:

- Object to our use of your child's personal data
- Prevent your child's data being used to send direct marketing
- Object to and challenge the use of your child's 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 your child deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your child's 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).

## 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**: Janette Gaffney, Frays Academy Trust, c/o Cowley St Laurence CE Primary School, Worcester Road, Cowley, Uxbridge, UB8 3TH, 01895 462 361, [office@fraysacademytrust.org](mailto:office@fraysacademytrust.org).

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.