Hamwic Education Trust

Hamworthy Federation

Twin Sails Infant School & Nurser

And Hamworthy Park Junior School

Pupil and Parent Privacy Notice

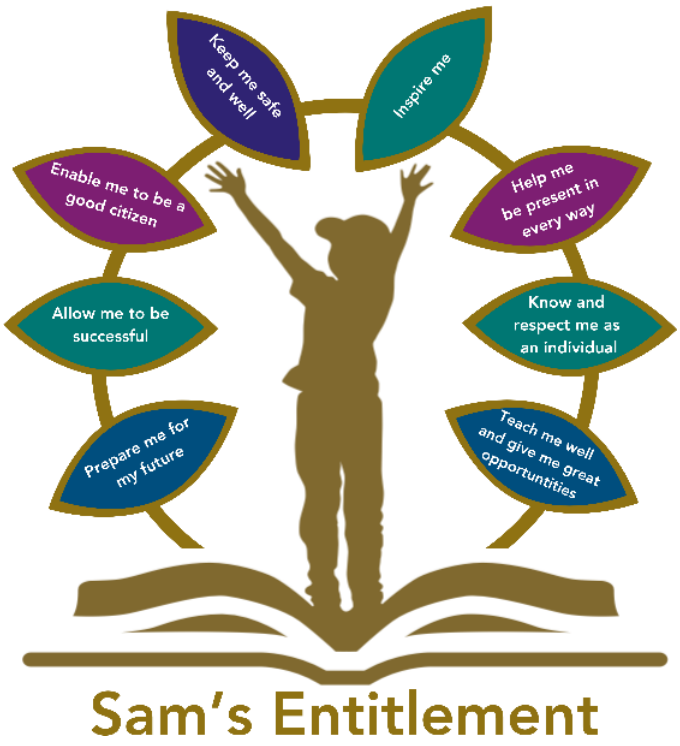
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1. History of Policy Changes

Date	Page	Change	Origin of Change

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3. Introduction

"Hamwic Education Trust (HET) believe that all pupils should receive a high quality, enriching, learning experience in a safe and inclusive environment, which promotes excellence through a broad curriculum that prepares them for their future and opens doors to a diverse array of opportunities as well as that all pupils and adults within HET flourish as individuals and together." Hamwic Education Trust (HET) is required by law to collect and process personal information about our pupils. We are committed to being transparent about how we collect and use this information and to meet our data protection obligations.

This privacy notice provides you with information about how we collect and process personal information of our pupils and their parents/carers in accordance with the UK General Data Protection Regulation (**UK GDPR**) and the Data Protection Act 2018.

4. Scope

We are Hamworthy Federation, comprising of 2 schools – Twin Sails Infant School & Nursery and Hamworthy Park Junior School - and are part of the Hamwic Education Trust (HET), this a multi-academy trust incorporating a number of different schools. Our registered office is Unit E, The Mill Yard, Nursling Street, Southampton, Hampshire SO16 0AJ and our company number is 10749662

This privacy notice has been issued on behalf of HET. When we refer to "we", "us", "our" or "the Trust" within this privacy notice, we are referring to Hamworthy Federation (Twin Sails Infant School &

Nursery and Hamworthy Park Junior School) which is part of HET. HET is the 'data controller' for the purposes of data protection law and is registered with the Information Commissioner's Office.

HET has appointed a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

5. What data do we collect?

We collect and process a wide range of information about pupils, parents and carers. This includes:

- Personal information such as name, date of birth, unique pupil number, address, email address, phone numbers, emergency contact details and marital status.
- Characteristics such as ethnicity, language, country of birth, free school meal eligibility.
- Attendance information such as the number of sessions attended, the number of absences, the reasons for those absences and any previous schools attended.
- Assessment and attainment information such as current pupil progress, predicted progress and, where appropriate, data relating to any assessments, tests or exams taken.
- Behavioural information, which may include information about your child's general classroom behaviour including any awards gained, together with any detentions, fixed term or permanent exclusions they have received.
- Financial records about any money you have paid us; any amounts outstanding and associated recovery action. Depending on your chosen method of payment, we may hold your bank account details.
- Pastoral information, including notes of any home visits undertaken.
- Safeguarding information including notifications from the police, court orders and/or social care involvement.
- For pupils enrolling for post-14 qualifications, the Learning Records Service will give us the Unique Learner Number (ULN) any may also give us details about pupil learning or qualifications.
- Destination data (this is information about what pupils do after leaving school, for example, different school, college, university, apprenticeship, employment).
- Post 16 learning information.
- Information about your use of our information and communications systems through our filtering and monitoring software.
- Photographs.
- CCTV images.
- Correspondence and complaints.
- Details of any other information that is provided to us by pupils and parents/carers whilst during the course of our relationship with you.

6. What sensitive information do we collect?

We may also collect, store and use the following more sensitive types of personal information (known as 'special category data') including:

- Relevant medical information including any conditions, disabilities or allergies pupils may have and doctors details.
- Special educational needs information. This information about any particular needs that your child has, any funding that is received specifically for your child and any statements of individual needs.
- Information relating to ethnicity, nationality and religion.

- Information relating to free school meal eligibility or other funding such as Pupil Premium, ESA, High Needs Funding and Catch-Up Funding.
- Biometric data (such as thumb prints for catering services / attendance / access to systems).

7. Why do we collect and use this information?

We have set out below a description of all the ways we plan to use pupil and parent/carer information, and which of the legal bases we rely on to do so. We may process pupil and parent/carer information for more than one lawful basis depending on the specific purpose for which we are using your information.

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
To support pupil learning	Contact details and characteristics Attendance information Special educational needs information Eligibility information Behavioural information Pastoral and safeguarding information	Necessary to comply with our legal obligations Necessary for the performance of task carried out in the public interest
To monitor and report on pupil attainment progress including arranging suitable interventions to be put in place when required	Contact details and characteristics Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information	Necessary to comply with our legal obligations Necessary for the performance of task carried out in the public interest
To provide appropriate pastoral care and ensure your child has access to appropriate support	Contact details and characteristics Attendance information Assessment information	Necessary to comply with our legal obligations Necessary for the performance of task carried out in the public interest

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
	Special educational needs information Behavioural information Pastoral and safeguarding information	
To assess the quality of our services	Contact details and characteristics Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information Destination data	Necessary to comply with our legal obligations Necessary for our legitimate interests to improve our performance
To keep pupils and staff safe	Contact details and characteristics Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information Photographs CCTV	Necessary to comply with our legal obligations Necessary for the performance of task carried out in the public interest
To comply with statutory duties placed upon us for Department for Education data collections	Contact details and characteristics Attendance information Assessment information	Necessary to comply with our legal obligations

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
	Special educational needs information Behavioural information Pastoral and safeguarding information	Necessary for the performance of task carried out in the public interest
To communicate with parents/carers and provide updates relating to pupil learning	Contact details and characteristics Correspondence Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information Photographs	Necessary to comply with our legal obligations Necessary for our legitimate interests to improve our communications with parents/carers Consent
To process payments from parents/carers	Contact details and characteristics Correspondence Financial information	Necessary for the performance of a contract

8. Why do we collect and process sensitive information?

We have set out below a description of all the ways we plan to use more sensitive "special category data" of pupils and parents/carers, and which of the legal bases we rely on to do so. We may process pupil and parent/carer information for more than one lawful ground depending on the specific purpose for which we are using your information.

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
To ensure dietary needs are catered for	Medical information	Vital interests

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
		Necessary to comply with our legal obligations Schedule 1, Part 2, (6) Data Protection Act 2018 – Statutory Purposes
To make reasonable adjustments for the provision of learning	Medical information	Necessary to comply with our legal obligations Schedule 1, Part 2, (6) Data Protection Act 2018 – Statutory Purposes
For statistical analysis of our pupils	Race, nationality and ethnicity information	Necessary to comply with our legal obligations Schedule 1, Part 2, (6) Data Protection Act 2018 – Statutory Purposes
To keep pupils and staff safe	Medical information Behavioural information Pastoral and safeguarding information	Necessary to comply with our legal obligations Necessary for reasons of substantial public interests Schedule 1, Part 2, (18) Data Protection Act 2018 – Safeguarding children and adults at risk Schedule 1, Part 1, (3) Data Protection Act 2018 – Public Health
To support pupils with special educational needs	Special educational needs information Medical information	Necessary to comply with our legal obligations Necessary for reasons of substantial public interests

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
		Schedule 1, Part 2, (6) Data Protection Act 2018 – Statutory Purposes

9. Collecting personal information

Generally, the information we hold will have been provided directly from pupils and parents/carers (e.g. information inputted into our management information system or information from when we communicate with you). We will also obtain information about pupils from previous schools attended.

We may also hold information about you which has been provided by third parties. This may include from local authorities, the court, or other professionals involved in a pupil's care.

We sometimes audio/ video record sessions/lessons/assessments for pupil or staff development and assessment. This will generate personal data including pupil images, names, contributions, and will be protected, processed, and retained in the same way as all personal data, in line with our data protection policies.

The majority of information we collect from pupils and parents/carers is required by law, but some of it may be provided on a voluntary basis. Where information is requested voluntarily, you will be informed that you have a choice in whether or not you provide this information

10. Storing personal information

We keep pupil and parent/carer information for the duration of time the pupil remains at the school. If/when a pupil transfers to an alternative school, their file will transfer with them; a copy will not be held by the school. If a pupil leaves the school at the end of their compulsory education, the files are stored in accordance with our Records and Retention Schedule.

Any information held by HET which does not form part of the pupil record will be kept for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. Details of retention periods for different aspects of personal information are available upon request. After this period, we will securely destroy or anonymise personal information in accordance with data protection law.

11. Who do we share information with?

- We routinely share pupil and parent/carer information with:
- Schools that the pupil attends after leaving us
- Our local authority
- The Department for Education including Learner Record Services, the National Pupil Database and the Teaching Regulation Agency
- Examining bodies
- Ofsted
- Law enforcement agencies
- Courts and tribunals
- Other schools within HET

- Our auditors, insurers and other professional advisers
- Health and social welfare organisations, including NHS agencies, services and the school nurse
- Universities
- Employers/training providers where references are requested
- Catering providers
- Speech and language provider
- Other third parties we may engage the services of for the purposes of providing a public task or the administration of the Trust, for example our safeguarding monitoring software, our management information system provider
- Other third parties in the event of transferring or restructuring part of the Trust

12. Why do we share information with the Department of Education (DfE)?

We do not share information about our pupils or parents/carers without consent unless the law allows us to do so. The DfE collects personal information from educational settings and local authorities via various statutory data collections. We are required to share information about our pupils with the DfE either directly or via our local authority for the purpose of those data collections, under [regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013].

All data is transferred securely and held by the DfE under a combination of software and hardware controls, which meet the current government security policy framework.

For more information, please see 'How Government uses your data' section at Annex One. For privacy information on the data the Department for Education collects and uses, please see: https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3 and https://www.gov.uk/government/publications/privacy-information-key-stage-4-and-5-and-adult-education

13. International Transfers of Personal Data

Your personal information may be transferred outside the UK and the European Economic Area (**'EEA'**), including to the United States. Where information is transferred outside the UK or EEA to a country that is not designated as "adequate" in relation to data protection law, the information is adequately protected by the use of International Data Transfer Agreements and security measures, and other appropriate safeguards. For more information on international transfers please contact us at the details below.

14. Your rights

Data protection law gives parents and pupils certain rights about how their information is collected and used. To make a request for your personal information, please contact the Data Compliance Officer (DCO) in your school. See section 15 for their contact details.

Under data protection law, you also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of your personal information we have about you – this is called 'right of access', this is also known as a subject access request (SAR), data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.

- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances.
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to complain to the Information Commissioner if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. 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 haven't the right to object, but you have the right to withdraw consent.

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 Make a complaint about how an organisation has used your personal information | ICO.

For further information on how to request access to personal information held centrally by the DfE, please see the 'Annex One - How Government uses your data'.

15. Withdrawal of consent

Where we are processing your personal information 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 Compliance Officer (DCO) in your school.

16. Contact

We have a person called the Data Compliance Officer (DCO) at the school. They can answer any questions about this privacy notice or what the school does with your information.

If you or your parents/carers want to speak to them, then you can do at:

Operation Manager: operations@hamworthyprimaryschools.co.uk or

contact the school office 01202 672377 and wait to be transferred.

You can also contact the Trust's Data Protection Officer (DPO), Gemma Carr, Deputy CEO.

Email: compliance@hamwic.org. Telephone: 023 8078 6833.

Address: Hamwic Education Trust, Unit E, The Mill Yard, Nursling Street, Southampton, Hampshire SO16 0AJ.

17. Monitoring & Review

This policy will be reviewed annually by the owner

18. Appendices

How does the government use pupil data?

The pupil data that we lawfully share with the DfE through data collections:

- underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- informs 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).
- supports 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

Data Collection Requirements

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

The National Pupil Database (NPD)

The NPD is owned and managed by the DfE and contains information about pupils in schools in England. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

The data in the NPD is provided as part of the operation of the education system and is used for research and statistical purposes to improve, and promote, the education and well-being of children in England.

The evidence and data provide DfE, education providers, Parliament and the wider public with a clear picture of how the education and children's services sectors are working in order to better target, and evaluate, policy interventions to help ensure all children are kept safe from harm and receive the best possible education.

To find out more about the NPD, go to https://www.gov.uk/government/publications/national-pupil-database-npd-privacy-notice/national-pupil-database-npd-privacy-notice

Learner Records Service

The information you supply is used by the Learning Records Service (LRS). The LRS issues Unique Learner Numbers (ULN) and creates Personal Learning records across England, Wales and Northern Ireland, and is operated by the Education and Skills Funding Agency, an executive agency of the Department for Education (DfE). For more information about how your information is processed, and to access your Personal Learning Record, please refer to: https://www.gov.uk/government/publications/lrs-privacy-notices

Sharing by the DfE

DfE will only share pupils' 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 pupils' 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 DfE's NPD 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 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 pupil 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

Further Information

For further details about the way in which the DfE uses pupil data and to exercise your data protection rights, please visit: https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights