

Fritchley Primary School

Privacy policy

GDPR compliant

We take your privacy very seriously. Please read this privacy policy carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint.

When we use your personal data we are regulated under the General Data Protection Regulation (GDPR) which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal data for the purposes of the GDPR. Our use of your personal data is subject to your instructions, the GDPR, other relevant UK and EU legislation and our professional duty of confidentiality.

Key terms

It would be helpful to start by explaining some key terms used in this policy:

We, us, our, ('the School')	Fritchley Primary School, Church Street Fritchley Belper Derbyshire DE56 2FQ
Our data protection officer	Mr Richard Roberts richard@lovedays-solicitors.co.uk 01629 704585
Personal data	Any information relating to an identified or identifiable individual
Special category personal data	Personal data revealing racial or ethnic origin, political opinions, religious beliefs, philosophical beliefs or trade union membership Genetic and biometric data Data concerning health, sex life or sexual orientation

Personal data we collect about you

The table below sets out the personal data we will or may collect in the course of advising and/or acting for you.

Personal data we will collect
Your name, address and telephone number
Information to enable us to check and verify your identity, eg your date of birth or passport details
Electronic contact details, eg your email address and mobile phone number
Information relating to your children attending or proposed to attend the School
Safeguarding chronology

This personal data is required to enable us to provide our service to you. If you do not provide personal data we ask for, it may delay or prevent us from providing services to you.

How your personal data is collected

We collect most of this information from you, direct. However, we may also collect information:

- directly from a third party, eg:
 - the local authority;
- from a third party with your consent, eg:
 - *Teachers to Parents – texts & parents evening requests*
- via our website—we use cookies on our website (for more information on cookies, please see our cookies policy.
- via our information technology (IT) systems, eg:
 - **RM Integris – the school’s management system.**

How and why we use your personal data

Under data protection law, we can only use your personal data if we have a proper reason for doing so, eg: We use this personal data to:

- support our pupils’ learning
- monitor and report on their progress
- provide appropriate pastoral care; and
- assess the quality of our services
- protect public monies against fraud
- to comply with our legal and regulatory obligations
- or where you have given consent.

A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use your personal data for and our reasons for doing so:

What we use your personal data for	Our reasons
Gathering and providing information required by or relating to audits, enquiries or investigations by regulatory bodies	To comply with our legal and regulatory obligations
Ensuring School policies are adhered to, eg policies covering security and internet use	For our legitimate interests or those of a third party, ie to make sure we are following our own internal procedures so we can deliver the best education for your child/children
Ensuring the confidentiality of commercially sensitive information	For our legitimate interests or those of a third party, ie to protect our intellectual property and other commercially valuable information To comply with our legal and regulatory obligations
Statistical analysis to help us manage our School,	For our legitimate interests or those of a third party, ie to be as efficient as we can so we can deliver the best education for your child/children
Preventing unauthorised access and modifications to systems	For our legitimate interests or those of a third party, ie to prevent and detect criminal activity that could be damaging

What we use your personal data for	Our reasons
	for us and for you To comply with our legal and regulatory obligations
Updating and enhancing School records	To comply with our legal and regulatory obligations
Statutory returns	To comply with our legal and regulatory obligations
Ensuring safe working practices, staff administration and assessments	To comply with our legal and regulatory obligations For our legitimate interests or those of a third party, eg to make sure we are following our own internal procedures and working efficiently so we can deliver the best service to you
External audits and quality checks, e.g. OFSTED	For our legitimate interests or a those of a third party, ie to maintain our accreditations so we can demonstrate we operate at the highest standards To comply with our legal and regulatory obligations

The above table does not apply to special category personal data, which we will only process with your explicit consent.

Promotional communications

We may use your personal data to send you updates (by email, text message, telephone or post) about School developments that might be of interest to you and/or information about the School.

We have a legitimate interest in processing your personal data for promotional purposes (see above '**How and why we use your personal data**'). This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal data with the utmost respect and never sell or share it with other organisations for marketing purposes.

You have the right to opt out of receiving promotional communications at any time by:

- contacting our Data Protection Officer (details below).

We may ask you to confirm or update your marketing preferences if you instruct us to provide further services in the future, or if there are changes in the law, regulation, or the structure of our business.

Who we share your personal data with

We routinely share personal data with:

- The local Authority – Census data
- Another school – if a child leaves or moves on to secondary school.
- The Department for Education (DfE) – Test data from statutory assessments

We only allow our service providers to handle your personal data if we are satisfied they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers relating to ensure they can only use your personal data to provide services to us and to you.

We may disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

- We may also need to share some personal data with other parties, such as the local Authority; the School's Governors; Social services and other outside agencies (with your permission) such as Speech & Language service; School nurse; Multi-agency team (MAT); Behaviour support service; Educational Psychologist; CAMHs (Child & Adult Mental Health service).

Usually, information will be anonymised but this may not always be possible. The recipient of the information will be bound by confidentiality obligations.

We will not share your personal data with any other third party.

For more information on how this sharing process works, please visit:

<https://www.gov.uk/guidance/national-pupil-database-apply-for-a-data-extract>

For information on which third party organisations (and for which project) pupil level data has been provided to, please visit: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

If you need more information about how our local authority and/or DfE collect and use your information, please visit:

- our local authority at <http://www.derbyshire.gov.uk/privacynotices> ; or
- the DfE website at <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

If you are unable to access these websites, please contact:

For Derbyshire County Council:

Information Governance Officer

Children's Services Department, Derbyshire
County Council

Room 361
County Hall
Matlock
Derbyshire
DE4 3AG

Email: cs.dpandfoi@derbyshire.gov.uk

Telephone: 01629 532011

For DfE:

Public Communications Unit,

Department for Education,

Sanctuary Buildings,

Great Smith Street,

London, SW1P 3BT

Website: www.education.gov.uk

Email: <http://www.education.gov.uk>

Telephone: 0370 000 2288

Where your personal data is held

Information may be held at our School and those of our, third party agencies, service providers, representatives and agents as described above (see '**Who we share your personal data with**').

Some of these third parties may be based outside the European Economic Area. For more information, including on how we safeguard your personal data when this occurs, see below: '**Transferring your personal data out of the EEA**'.

How long your personal data will be kept

We will keep your personal data after your child/children has finished at the School. We will do so for one of these reasons:

- to respond to any questions, complaints or concerns raised by you or on your behalf;
- to show that we treated your child/children fairly;
- to keep records required by law.

We will not retain your data for longer than necessary for the purposes set out in this policy. Different retention periods apply for different types of data. Further details on this are available in our *set out details of records management policy and/or retention schedule that gives these details*. Please see our school's data retention policy.

When it is no longer necessary to retain your personal data, we will delete or anonymise it.

Transferring your personal data out of the EEA

To deliver our services to you, it is sometimes necessary for us to share your personal data outside the European Economic Area (EEA), eg:

- with our service providers located outside the EEA;
- if you are based outside the EEA;

These transfers are subject to special rules under European and UK data protection law.

The following countries to which we may transfer personal data have been assessed by the European Commission as providing an adequate level of protection for personal data: USA (**Microsoft for example**)

Except for the country listed above, non-EEA countries do not have the same data protection laws as the United Kingdom and EEA. We will, however, ensure the transfer complies with data protection law and all personal data will be secure.

If you would like further information please contact us or our Data Protection Officer (see 'How to contact us' below).

Your rights

You have the following rights, which you can exercise free of charge:

Access	The right to be provided with a copy of your personal data
Rectification	The right to require us to correct any mistakes in your personal data
To be forgotten	The right to require us to delete your personal data—in certain situations
Restriction of processing	The right to require us to restrict processing of your personal data—in certain circumstances, eg if you contest the accuracy of the data
Data portability	The right to receive the personal data you provided to us, in a structured, commonly used and machine-readable format and/or transmit that data to a third party—in certain situations
To object	The right to object: —at any time to your personal data being processed for direct marketing (including profiling); —in certain other situations to our continued processing of your personal data, eg processing carried out for the purpose of our legitimate interests.
Not to be subject to automated individual decision-making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you or your child

For further information on each of those rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- email, call or write to us or our Data Protection Officer—see below: '**How to contact us**'; and
- let us have enough information to identify you (*eg your full name, address*).
- let us know what right you want to exercise and the information to which your request relates.

Keeping your personal data secure

We have appropriate security measures to prevent personal data from being accidentally lost, or used or accessed unlawfully. We limit access to your personal data to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

If you want detailed information from Get Safe Online on how to protect your information and your computers and devices against fraud, identity theft, viruses and many other online problems, please visit www.getsafeonline.org. Get Safe Online is supported by HM Government and leading businesses.

How to complain

We hope that we OR our Data Protection Officer can resolve any query or concern you may raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: [0303 123 1113].

Changes to this privacy policy

This privacy policy was published on 25th May 2018 and last updated on 25th May 2018.

We may change this privacy policy from time to time, when major changes are made we will inform you via letter.

How to contact us

Please contact us and/or our Data Protection Officer by post, email or telephone if you have any questions about this privacy policy or the information we hold about you.

Our contact details are shown below:

Our contact details	[Our Data Protection Officer's contact details]
Heather Smith School Business officer Fritchley CE Primary & Nursery School Church Street	Mr Richard Roberts richard@lovedays-solicitors.co.uk 01629 704585

Our contact details	[Our Data Protection Officer's contact details]
Fritchley Belper DE56 2FQ enquiries@fritchley.derbyshire.sch.uk 01773 852216	

Do you need extra help?

If you would like this policy in another format (for example audio, large print, braille) please contact us (see 'How to contact us' above).