



Hillingdon Primary School

Privacy Notice for Parents and Carers



Under the General Data Protection Regulation (GDPR) individuals have a right to be informed about how we use any personal data that we hold about them. As an academy within The Elliot Foundation Academy Trust we comply with this right by providing a Privacy Notice to individuals where we are processing their personal data.

For the purposes of data protection law The Elliot Foundation Academy Trust is the 'data controller'. The Data Protection Officer for the trust, who oversees how we collect, use, share and protect your information, is Jem Shuttleworth (jem.shuttleworth@elliottfoundation.co.uk).

For the purposes of data protection law we, Hillingdon Primary School, are the 'data processor'. Our Local Compliance Officer, who works with staff in the school to process and protect your data, is the Governance and Policy Officer, Louise Daniel.

This Privacy Notice explains how we collect, store and use personal data about children

Categories of pupil information that we process include, but are not restricted to:

1. Personal identifiers, contacts and characteristics (such as names, unique pupil number, contact details and address)
2. Characteristics (such as ethnicity, language and free school meal / pupil premium eligibility)
3. Safeguarding and child protection information (such as court orders and professional involvement)
4. Special educational needs (such as professional involvement, care packages, plans and support providers)
5. Medical and administration (such as doctors information, child physical and mental health, dental health, allergies, medication and dietary requirements)
6. Attendance (such as sessions attended, number of absences, absence reasons and any previous schools or settings attended)
7. Assessment and attainment (such as results of internal and externally set tests and teacher judgements)
8. Behavioural information (such as reports, exclusions and any support put in place)

GDPR specifically defines 'special category' as data relating, but not restricted, to:

1. Racial or ethnic origin
2. Political opinions
3. Religious or philosophical beliefs
4. Health

Within our school we also process some sensitive information about our pupils that is not identified as 'special category'. However we consider it appropriate to treat such information with the same care.

We may also hold data about pupils that we have received from other organisations, including other schools, local authorities and the Department for Education.

Online systems that we use to process pupil information:

We use a variety of online systems to support the day-to-day running of the academy, pupil assessment and behaviour strategies. Access for staff to these systems is determined by their role and whether they have a recognised need to access the information.

The systems listed below all hold and process personal pupil information.

	SOFTWARE	PURPOSE
1.	ScholarPack and Assembly Analytics	Day-to-day running of the academy and primarily hold pupil information.
2.	Google Drive	A cloud based platform which provides our pupils with multiple resources for teaching and learning.
3.	School Secure Shared Drives	Staff work and reports.
4.	ParentPay	Online payments for trips and extra curricular activities.
5.	SchoolCloud Parents Evening	Online booking of parent consultation meetings, including facilitation and hosting of virtual meetings.
6.	MyConcern	Cloud based safeguarding software for educational settings that records and manages safeguarding concerns for pupils at the school.
7.	E-Safe	Please see Appendix A of the GDPR Privacy Notice
8.	Tapestry	A secure online learning journal helping EYFS staff and families celebrate their children's learning and development.
9	GL Assessment software	An individualised assessment to support children with specific learning difficulties (SpLd) which helps teachers identify their strengths and areas of need in relation to their learning. Permission is sought from parents in advance.
10	Speech Link	Used to investigate speech and language concerns thereby enabling the implementation of early intervention and prevention strategies.
11	Iris Connect	Provides professional development for teachers that enables them to engage with self evaluation, reflection and receive feedback from colleagues.

We also use a variety of online resources to support school and home learning which hold basic pupil information, such as the child's name, class and school email address, to enable each pupil to log in to their own account. These include:

- My Maths
- TTRockstars
- Scratch
- ABCya Animate
- Bug Club
- NearPod
- Code.org
- Spelling Shed
- Tinkercad
- 3D Slash

We ensure that any company that holds personal information related to our pupils or parents / carers has a Privacy Policy that is compliant with the General Data Protection Regulations, and these are available for parents to view online.

CCTV system that we use:

We operate a CCTV system. This system is in operation 24 hours per day and runs on a 31 day loop. CCTV is in place to support security of the academy site. The system operated by the academy has no data storage facility and the images taken are overwritten after 31 days. The system is monitored by Spy Alarms Ltd. If you require any further information regarding the CCTV system in operation, please contact the Local Compliance Officer or Premises Manager.

Why we collect and use personal data:

We only collect and use pupils' personal data when the law allows us to.

We obtain pupil information via registration forms/medication forms/Common Transfer Files from previous schools/Child Protection Plans. We do this at the start of each academic year and as is required throughout the academic year.

While the majority of information we collect about pupils is mandatory, there is some information that can be provided voluntarily. Whenever we seek to collect information from you we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

Most commonly, we collect and process this pupil information where we need to perform an official task in the public interest and/or we need to comply with a legal obligation.

1. To protect and keep safe all pupils
2. To provide appropriate pastoral care
3. To support pupil learning
4. To monitor and report on pupil attainment and progress
5. To met the statutory duties placed upon us
6. To assess the quality of our services

Less commonly, we may also process pupils' personal data in situations where we have obtained consent to use it in a certain way and/or we need to protect the individual's vital interests (or someone else's interests).

Some of the reasons listed above overlap and there may be several grounds which justify our use of this data.

Where we have obtained consent to use pupils' personal data this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

We share news items on social media to celebrate pupil and academy achievements. Consent for sharing of images/videos and names of pupils on social media is sought from parents in advance. Consent for sharing these images may be withdrawn at any time. Parents are invited to follow the academy twitter and facebook accounts but do this through their own choice. These social media accounts are not for marketing purposes, and are solely to communicate upcoming events, news and celebrations. Parents can withdraw from the academy twitter and facebook feeds at any time by clicking 'unfollow'.

How we store this data:

We keep personal information about pupils securely for the duration of time they are on-roll. The pupil files are then transferred to the pupil's next education setting (either to the next primary school or the pupil's secondary school).

However, specific pupil information is retained if the pupil has been involved with a Child Protection concern, has identified Special Educational Needs or has been involved in a reported accident. In these cases, personal pupil information is held securely for 25 years from the birth date of the pupil. The Elliot Foundation Academy Trust retains data about pupils in line with statutory timeframes and no longer than is necessary.

Who we share this data with:

We do not share information about pupils 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 data protection law) we may share personal information about pupils with:

1. Schools that the pupil's attend after leaving the academy
2. Our Local Authority
3. Examining Bodies and our regulator, Ofsted
4. The Department for Education (DfE)
5. National Health Service (NHS) and their commissioned health services
6. Child and Adolescent Mental Health Service (CAMHS)
7. London Borough of Hillingdon (LBH) SEN/Inclusion Support Services
8. LBH SEN services (where the pupil resides in LBH- Local Authority)
9. Social Services and other social welfare organisations
10. The Elliot Foundation Academies Trust
11. Police forces, courts and tribunals
12. Trip locations (such as swimming pools etc) to support accessibility and health and safety
13. Suppliers and service providers to enable them to provide the service we, or the trust, have contracted them for

The National Pupil Database

We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school 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.

The Department may share information from the NPD with other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

For more information please contact the Department - <https://www.gov.uk/contact-dfe>

Requesting access to your child's personal information:

Individuals have a right to make a 'subject access request' (SAR) to gain access to personal information that the school holds about them.

Parents/carers can make a request with respect to your child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12).

If you make a SAR, and if we do hold information about your child, we will:

1. Give you a description of it
2. Tell you why we are holding and processing it, and how long we will keep it for
3. Explain where we got it from, if not from you or your child
4. Tell you who it has been, or will be, shared with
5. Let you know whether any automated decision-making (by a computer or machine, rather than by a person) is being applied to the data, and any consequences of this
6. Give you a copy of the information in an intelligible form

To make a request for your child's personal information, or be given access to your child's educational record, please contact Louise Daniel (Local Compliance Officer).

SARs must be made in writing. If you cannot make a request in writing, please contact the Local Compliance Officer as they will be able to support you with making a request.

We will not charge for carrying out a SAR unless the request is 'excessive' or a copy of information that has already been given. SARs may take up to one month to action.

Other rights:

Under GDPR individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

1. Object to the use of personal data if likely to cause, or is causing, damage or distress
2. Prevent processing for the purpose of direct marketing
3. Object to decisions being taken by automated means
4. In certain circumstances, have inaccurate personal information rectified, blocked, erased or destroyed
5. Claim compensation for damages caused by a breach of the General Data Protection Regulations

To exercise any of these rights please contact the Data Protection Officer for the trust - jem.shuttleworth@elliottfoundation.co.uk

Complaints:

As a school, and as part of The Elliot Foundation Academies Trust, 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 the Local Compliance Officer in the first instance.

To make a formal complaint please contact the Data Protection Officer for the trust.

Contact us:

If you have any questions, concerns or would like more information about anything mentioned in this Privacy Notice, please contact Louise Daniel, the Local Compliance Officer on 01895 590087 or at hillprimary@hillingdonprimarieschool.org.uk.