



Introduction

Under UK data protection law, individuals have a right to be informed about how Charlton Kings Junior School uses any personal data that we hold about them. We comply with this right by providing privacy notices to individuals where we process their personal data.

This privacy notice explains how we collect, store and use personal data about pupils.

This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time and will provide you with an updated copy as soon as reasonably practical.

Charlton Kings Junior School is the 'data controller' for the purposes of UK data protection law.

Our Data Protection Officer is The Schools Data Protection Services at Gloucestershire County Council.

We will comply with the data protection principles, which means your data will be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained and not used in ways incompatible with those purposes
- Relevant and limited to what is necessary
- Accurate and kept up to date
- Kept only as long as necessary
- Kept securely

Types of pupil data we collect

The categories of Pupil information that we collect, process, hold and share include:

- Personal Identifiers such as name, unique pupil number, contact details, date of birth.
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Characteristics, such as language, eligibility for free school meals and Pupil Premium
- Special educational needs information including the needs and ranking
- Details of any support received, including care packages, plans and support providers
- Behavioural information including exclusions and detentions
- Attendance information (such as session attendance, number of absences, absence reasons and details of any previous schools attended)
- Safeguarding information (such as court orders and professional involvement)
- Photographs
- Data relating to your use of ITC systems including filtering and monitoring for the purpose of safeguarding
- CCTV images captured in and around the school site

- Any other personal data we will inform you of from time to time.

We may also collect, store and use information about pupils that falls into "special categories" (more sensitive personal data). This includes information about (where applicable):

- Special characteristics (such as ethnicity, language, nationality, country of birth and free meal eligibility)
- Religious or philosophical beliefs and health
- Photographs
- Medical information including details of any medical conditions, including physical and mental health, GP contact details, allergies, medication and dietary requirements

We may also hold data about pupils that we have received from other bodies, including other schools and / or academies, Social Services and Law enforcement agencies.

Why we collect and use this data

We collect parental/carers information to safeguard and promote the welfare of your child(ren), to promote the objects and interests of Charlton Kings Junior School, to facilitate the efficient operation of Charlton Kings Junior School, and to ensure that all relevant legal obligations are complied with.

For example, we collect data to:

- Support Pupil learning and improve our teaching
- Monitor and report on Pupil progress
- Provide appropriate pastoral care
- Protect Pupil welfare
- Assess the quality of our services
- Keep Pupils safe
- Carry out research
- Comply with the law regarding data sharing
- Carry out our legal obligations
- Meet statutory duties placed upon us

Collecting pupil data

We collect Pupil information from:

- The admissions processes
- A Pupil's previous setting
- Common Transfer files
- Assessment and attainment processes
- Attendance (AM/PM)
- Staff/peer observations and interactions with the Pupil on a day-to-day basis
- Parent/Carer
- External partners, bodies and agencies
- Police forces, courts, tribunals

In addition, Charlton Kings Junior School uses CCTV cameras around the site for security purposes and the protection of staff, pupils and other stakeholders.

Most of the information provided to us is mandatory, some of it is provided voluntarily.

To comply with data protection legislation, we will inform parents whether you are required to provide certain information to us or if you have a choice in this and we will tell you what you need to do if you do not want to share this information with us.

Our lawful basis for using this data

We only collect and use personal data when the law and our policies allow us to do so.

We process general category data where:

- We need to comply with a legal obligation
- We need to perform a task in the public interest or for our official functions

Less commonly, we may also process data in situations where:

- We need to protect your vital interest or that of another person
- For our legitimate interest where Charlton Kings Junior School is not acting in its official capacity

We may process special category data:

- To protect your child's vital interests or those of another person, and where you/they are physically or legally incapable of giving consent
- If the information is manifestly made public by the parent (e.g. on social media)
- For the establishment, exercise or defence of legal claims, or whenever courts are acting in their judicial capacity
- Where it is necessary for reasons of substantial public interest
- Where it is necessary for reasons of substantial public interest in the area of public health
- For archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

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

Who do we share pupil data with?

We do not share pupil data with anyone without consent unless the law and our policies allow us to do so. We routinely share pupil data with:

- The Department for Education

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our pupils with the Department for Education (DfE) either directly or via our local authority under regulation 4 of The Education (Information About Individual Pupils) (England) Regulations (2013).

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

- Our Local Authority (to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions, and to fulfil our public interest tasks such as the provision of free school meals)

We may be required to share information about our Pupils with Local Authority to ensure that they can conduct their statutory duties under the Schools Admission Code, including conducting Fair Access Panels.

- Our Local Schools (only for transfers purposes)

We share pupil details for school transfer purposes. Sharing this information helps the receiving school prepare appropriately for the pupil's arrival and ensure that their needs can be understood and supported from the outset.

- 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 for Education 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, 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.

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

We may share pupil data with:

- Your family and representatives – to carry out our public interest tasks such as reporting on pupil progress or being a contact if a pupil is ill
- Educators and examining bodies – to carry out our public interest tasks in relation to examinations
- Our regulator Ofsted, which monitors many aspects of our public interest tasks
- Our auditors – to meet our legal and public interest obligations relating to financial matters
- Survey and research organisations
- Health authorities – to carry out our public interest tasks and safeguard the vital interests of pupils
- Security organisations – for our public interest tasks in relation to keeping pupils safe, keeping the site secure and preventing crime
- Health and social welfare organisations – where this is covered by our public interest tasks or to safeguard the vital interests of pupils
- Professional advisers and consultants – to help us carry out our public interest tasks
- Charities and voluntary organisations – which may, for example, provide us with services or support our educational activities carried out in the public interest
- Police forces, courts, tribunals – where this is necessary for the prevention and detection of crime, required by law or for purposes arising out of our public interest tasks such as safeguarding pupils
- Professional bodies – to help us carry out our public interest tasks

Third-party service providers - suppliers and service providers – to enable them to provide the service we have contracted them for. For example:

- Outsourced provider for school payments - ParentPay
- Outsourced provider for Management Information System which stores pupil data – Arbor
- Outsourced provider for safeguarding monitoring of all pupils – CPOMs
- Outsourced providers for pupils learning in the curriculum such as Karboodle, MyMaths Provision Maps

These third-party service providers act as data processors on Charlton Kings Junior School' behalf. They are required to take appropriate security measures to protect your / your child's personal information in line with our policies and data

protection legislation. We authorise these service providers to use personal data only as necessary to perform services on our behalf, or to comply with legal obligations if necessary.

Criminal Proceedings / Convictions and Child Protection / Safeguarding Issues

This information is not routinely collected and is only likely to be processed by Charlton Kings Junior School in specific circumstances. For example, if a child protection issue arises, or 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.

Consent

We may process personal information relating to your child without your consent, in compliance with the above lawful bases, where this is required or permitted by law and / or our policies.

In limited circumstances, we may require written consent to allow us to process certain particularly sensitive data, or to use pupil images on our social media channels. If we do so require consent, we will provide full details of the information we would like and the reason we need it, so that careful consideration may be given to whether you wish to consent.

Where we rely solely on consent as the lawful basis for processing, consent may be withdrawn at any time (see below).

Storage and Retention

A significant amount of personal data is stored electronically. Some information may also be stored as a hard copy. All data is stored and processed following the Charlton Kings Junior School Data Protection Policy.

We will only retain your / your child's personal information for as long as necessary to fulfil the purposes we collected it for, including to satisfy any legal, accounting, insurance or reporting requirements.

CCTV

We have installed a CCTV system on our premises for the safety of staff, pupils, trustees, and other stakeholders, and for the prevention and detection of crime.

Signs are displayed notifying you that CCTV is in operation.

All CCTV images will be retained for 30 days. After this period the images are permanently deleted unless they are required for an ongoing incident/investigation, which has been identified. For example, if a crime has been observed and recorded, or the images are subject to a legal hold following a subject access request. In such cases, images will be retained for as long as necessary to support any internal or external proceedings.

Transferring data outside the UK

We do not routinely share data with organisations outside the UK. Where this may be necessary, we may transfer data with your explicit consent and with appropriate safeguards.

We will not transfer personal data outside the UK unless the transfer complies with the UK GDPR. This means that we cannot transfer any personal data outside the EEA unless:

- The EU Commission has decided that another country or international organisation ensures an adequate level of protection for personal data
- One of the derogations in the GDPR applies (including if an individual explicitly consents to the proposed transfer)

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In addition, we limit access to your personal information to those employees, consultants, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

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

Your data subject rights

You have the right to:

- Make a Subject Access Request
- Withdraw your consent to the processing at any time
- Ask us to rectify, erase or restrict the processing of your personal data, or object to the processing of it (in certain circumstances)
- Prevent the use of your personal data for direct marketing
- Challenge processing which has been justified based on public interest
- Request a copy of agreements under which your personal data is transferred outside of the UK
- Prevent processing that is likely to cause damage or distress
- Be notified of a data breach (in certain circumstances)
- Ask for personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances).
- Make a complaint to the ICO.

Your duty to inform us of change

The personal information we hold about your child must be accurate and current. Please keep us informed if personal information changes during your child's time with us.

Accessing your personal information (Subject Access Requests)

Under the data protection legislation, you have the right to request access to information about you that we hold.

Subject Access Requests may be made in writing or verbally.

If you would like to make a SAR concerning your personal data it would be helpful if this could be made in writing including:

- Your name and address
- The pupil's name if you are making a SAR on behalf of your child
- Email address and telephone number
- Details of the information required

Exercising other data subject rights

If you wish to review, verify, correct or request the erasure of your child's personal information, object to the processing of their personal data, or request that we transfer a copy of their personal information to another party, please contact Charlton Kings Junior School in the first instance.

Complaints

We take complaints about our processing of personal information very seriously. Please raise any concerns with us in the first instance by contacting our Business Manager at sbm@ckjs.org.uk

Alternatively, you can register your concern with the UK's data protection regulator - the Information Commissioner's Office:

- Report a concern online at www.ico.org.uk/make-a-complaint/your-personal-information-concerns/
- Call 0303 123 1113
- Or by post: Information Commissioner's Office- Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Changes to this Privacy Notice

This Notice will be reviewed every year or as necessary in response to changes in Data Protection legislation or our processing activities. We reserve the right to update this Privacy Notice at any time, and we will provide you with a new Privacy Notice when we make any substantial changes.

Contact us

If you would like to discuss anything in this privacy notice, please contact our Business Manager by emailing sbm@ckjs.org.uk