



Privacy Notice

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing a 'privacy notice' to individuals where we are processing their personal data. This privacy notice explains how we collect, store and use personal data about **pupils, parents/carers, staff, governors, volunteers and applicants**.

We, Bentley CEVC & Copdock Primaries Partnership, are the 'data controller' for the purposes of data protection law. Our data protection officer is Tracy Riches (see 'Contact us' below).

Privacy Notice For Everybody

Collecting this information

While the majority of information we collect about pupils, parents/carers, staff, governors, volunteers and applicants is mandatory, there is some information that can be provided voluntarily. Where we have obtained consent to use personal data, this consent can be withdrawn at any time.

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

How We Store This Data

We create and maintain a file for each pupil and for each staff member. We keep this information whilst the individual attends the school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. The information contained in this file is kept secure and is only used for purposes directly relevant to the child's education or the staff member's employment. A detailed document retention schedule can be found in The Data Protection Policy, Appendix 2.

Your Rights

How to access personal information we hold about you

You can find out if we hold any personal information about you, and how we use it, by making a 'subject access request', as long as we judge that you can properly understand your rights and what they mean. If we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and using it, and how long we will keep it for
- Explain where we got it from, if not from you or your parents
- Tell you who it has been, or will be, shared with
- Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)
- Give you a copy of the information

You may also ask us to send your personal information to another organisation electronically in certain circumstances. If you want to make a request please contact our data protection officer.

Your other rights over your data

You have other rights over how your personal data is used and kept safe, including the right to:

- Say that you don't want it to be used if this would cause, or is causing, harm or distress
- Stop it being used to send you marketing materials
- Say that you don't want it used to make automated decisions (decisions made by a computer or machine, rather than by a person)
- Have it corrected, deleted or destroyed if it is wrong, or restrict our use of it
- Claim compensation if the data protection rules are broken and this harms you in some way

Other Rights

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

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations



To exercise any of these rights, please contact our data protection officer.

How To Access Personal Information We Hold About You

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them. Parents/carers can make a request with respect to their 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), or where the child has provided consent. Parents also have the right to make a subject access request with respect to any personal data the school holds about them. If you make a subject access request, and if we do hold information about you or your child, we will:

- 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 personal information to be transmitted electronically to another organisation in certain circumstances. If you would like to make a request please contact our data protection officer. Parents/carers also have a legal right to access to their child's educational record. If you would like to make a request, please contact our data protection officer.

Our Legal Basis For Using This Data

We will only collect and use your information when the law allows us to. Most often, we will use your information where:

- We need to comply with the law
- We need to use it to carry out a task in the public interest (in order to provide you with an education)

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 go about withdrawing consent if you wish to do so. Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

Data Sharing

We do not share personal information about individuals with anyone outside the school without permission from you or your parents/carers, unless the law and our policies allow us to do so. Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you with:

- Our local authority – to meet our legal duties to share certain information with it, such as concerns about pupils' safety and exclusions
- The Department for Education (a government department)
- Your family and representatives
- Educators and examining bodies
- Ofsted, Diocese
- Suppliers and service providers – so that they can provide the services we have contracted them for
- Our auditors
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies

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. Some of this information is then stored in the National Pupil Database (NPD), which is managed by the Department for Education and provides evidence on how schools are performing. This, in turn, supports research. The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards and others.



The Department for Education may share information from the database with other organisations which promote children's education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data. For more information, see the Department's webpage on how it collects and shares research data.

Transferring Data Internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

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.

To make a complaint, please contact our data protection officer. Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

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:

- **Our DPO is Tracy Riches and is contactable via tracey.riches@clear7.co.uk**

This notice is based on the Department for Education's model privacy notice for the pupils, adapted for parents, and for school workforce including governors and volunteers, amended to reflect the way we use data in this school.

Privacy Notice for Pupils

The Personal Data We Hold

We hold some personal information about you to make sure we can help you learn and look after you at school. For the same reasons, we get information about you from some other places too – like other schools, the local council and the government.

This information includes:

- Your contact details
- Your test results
- Your attendance records
- Your characteristics, like your ethnic background or any special educational needs
- Any medical conditions you have
- Details of any behaviour issues or exclusions
- Photographs
- CCTV images (at Bentley)

Why We Use This Data

We use this data to help run the school, including to:

- Get in touch with you and your parents when we need to
- Check how you're doing in exams and work out whether you or your teachers need any extra help
- Track how well the school as a whole is performing
- Look after your wellbeing

Legal Basis

Sometimes, we may also use your personal information where:

- You, or your parents/carers, have given us permission to use it in a certain way
- We need to protect your interests (or someone else's interest)



Privacy Notice for Parents/Carers

What Data We Hold

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

- Contact details, contact preferences, date of birth
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Characteristics, such as ethnic background, eligibility for free school meals, or special educational needs
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs
- CCTV images captured in school (at Bentley)

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

Why We Use Data

We use this data to:

- Support pupil learning
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Protect pupil welfare
- Assess the quality of our services
- Administer admissions waiting lists
- Carry out research
- Comply with the law regarding data sharing

Our Legal Basis for Using this Data

We may also process pupils' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

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

Privacy notice for staff

The Personal Data We Hold

We process data relating to those we employ, or otherwise engage, to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Photographs
- CCTV footage (at Bentley)
- Data about your use of the school's information and communications system



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

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Health, including any medical conditions, and sickness records

Why We Use This Data

The purpose of processing this data is to help us run the school, including to:

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring
- Improve the management of workforce data across the sector

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:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

Data Sharing

In addition to the previous list of organisations, we may also share personal information about you with:

- Financial organisations
- Central and local government
- Survey and research organisations
- Trade unions and associations
- Employment and recruitment agencies

Privacy notice for Volunteers, Governors and Applicants

The Personal Data We Hold

We process data relating to those who volunteer at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Evidence of qualifications
- Employment details
- Information about business and pecuniary interests

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

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Disability and access requirements

Why we use this data

The purpose of processing this data is to support the Federation to:

- Establish and maintain effective governance
- Meet statutory obligations for publishing and sharing details
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Undertake equalities monitoring
- Ensure that appropriate access arrangements can be provided for volunteers who require them