

DATA PRIVACY STATEMENT

Policy Title	Data Privacy Statement
Approval Date:	Autumn 2019

Personal data

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

How we use your information

This privacy notice tells you how we, Khalsa Primary School, will collect and use your personal data for personal identifiers and contacts (such as name, unique pupil number, contact details and address)

- characteristics (such as ethnicity, language, and free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- special educational needs (including the needs and ranking)
- medical and administration (such as doctor's information, child health, dental health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (such as key stage 1, key stage 2 and phonics results)
- behavioral information (such as exclusions and any relevant alternative provision put in place)
- trips (such as medical and emergency contact details)
- photos for use in pupil activity book
- photos for use for school promotional purposes
- communications (such as Parent Mail, Class DoJo)

Why does Khalsa Primary School need to collect and store personal data?

In order for us to track your child academically we need to collect personal data to:

- support pupil learning
- monitor and report on pupil attainment progress
- provide appropriate pastoral care
- assess the quality of our services
- keep children safe (food allergies, or emergency contact details)
- communicate with parents
- meet the statutory duties placed upon us for DfE data collections

In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

We do not seek specific consent for taking photos of pupils as part of their individual activity tracking, this is part of our educational process and the photos taken for this purpose will only be shared with pupils, school staff and the pupil's legal guardians.

We obtain consent from the pupil's legal guardians as part of the application process and at the start of each academic year to use photos for school promotional purposes including but not limited to school social media accounts, the school prospectus, website or pictures on walls.

In terms of being contacted for marketing purposes Khalsa Primary School would contact you for additional consent.

Will Khalsa Primary School share my personal data with anyone else?

We may pass your personal data on to third-party service providers contracted to Khalsa Primary School during dealing with you. Any third parties that we may share your data with are obliged to keep your details securely. We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- School Nurse

When they no longer need your data to fulfil this service, they will dispose of the details in line with Khalsa Primary School's procedures.

How will Khalsa Primary School use the personal data it collects about me?

Khalsa Primary School will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation (GDPR). We will endeavor to keep your information accurate and up to date, and not keep it for longer than is necessary. Khalsa Primary School is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Admission forms are collated at the start of the school year along with in-year applications. Common Transfer File (CTF) are transferred from previous schools. Pupil data is essential for the schools' operational use.

Whilst the majority of pupil information you provide to us is mandatory, some of it requested on a voluntary basis. To comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this.

How we store pupil data

We hold pupil data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please contact our DPO, contact details are listed below:

Under what circumstances will Khalsa Primary School contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimise the risk of unauthorised access or disclosure.

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 for those data collections, under section 3 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, which meet the current government security policy framework.

Can I find out the personal data that the organisation holds about me?

Khalsa Primary School at your request, can confirm what information we hold about you and how it is processed. If Khalsa Primary School does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data.
- Contact details of the data protection officer
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Khalsa Primary School or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.

- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful
 information about the logic involved, as well as the significance and expected consequences of such
 processing.

What forms of ID will I need to provide in order to access this?

Khalsa Primary School accepts the following forms of ID when information on your personal data is requested:

- Passport or Driving Licence
- Child's full birth certificate
- Utility Bill (from last 3 months)

Contact details of the Data Protection Officer / GDPR Owner:

Nicola Cook DPO Solutions for Schools Ltd 4 Dymock Court Quainton Aylesbury HP22 4FD

Tel: 01296 658502

Email: nicola@schoolsdpo.com