GDPR Notice
&
Privacy Notices

The school collects, holds and uses a great deal of information about individuals, particularly pupils and adults connected with the school. Under the Regulation (EU) 2016/679 (General Data Protection Regulation), data about living individuals is known as personal data. The regulation puts in place numerous safeguards for the use of data about individuals.

Under the GDPR, the data protection principles set out the main responsibilities for organisations:

https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/principles/

The John Harrox Primary School has a statutory duty to comply with the requirements of the GDPR as it collects data about students and adults associated with the school for school business. The school is also required to produce a privacy notice explaining how information is collected and processed. A copy of the school's privacy notice is available further down this document. Our data protection policy is available on the website under the policies tab.

Information about your rights under GDPR can be found on the Information Commissioner's website.

All of the information we hold on individuals follows the six key principles:

1. Fair, lawful and transparent
2. Collected for specified, explicit and legitimate purposes
3. Adequate, relevant and limited to what is necessary
4. Accurate, and where necessary, kept up to date
5. Kept in a form which permits identification for no longer than is necessary
6. Processed in a manner that ensures appropriate security

Data Protection Officer (DPO) for the school is Joe Lee.

The John Harrox Primary School is committed to being open and transparent about the information we hold and publish.

As a public authority, the school has adopted the Information Commissioner's Office model publication scheme. This sets out the types of information that schools are expected to make available routinely, including key policies, governance information, financial information and other statutory documents. You can access the ICO model publication scheme here:
https://ico.org.uk/media2/for-organisations/documents/1153/model-publication-scheme.pdf

Guide to Information

Our Guide to Information explains what information we routinely make available, where it can be found, and whether there is any charge for providing it.

Most of the information listed in the guide is available on our school website, particularly through the following areas:

- School policies
- Governance information
- Curriculum information
- SEND information
- Safeguarding information
- Financial and statutory information
- Ofsted and performance information
- Privacy notices and data protection information

If information is already available on the school website, it can be accessed free of charge.
If you require a paper copy of information from the website, please contact the school office. Paper copies of information published on the school website are provided free of charge.

Some information may not be published where:

- the school does not hold the information
- the information is exempt under the Freedom of Information Act
- the information contains personal data
- publication would breach data protection requirements
- the information is already available through another public website

Freedom of Information requests should be made in writing to the school office
.
Email: dpo@ark.me.uk

Address: The John Harrox Primary School, Broad Lane, Moulton, Spalding, PE12 6PN.
The school will respond to Freedom of Information requests in line with statutory requirements.

Privacy notice for pupils

You have a legal right to be informed about how our school uses any personal information that we hold about you. To comply with this, we provide a 'privacy notice' to you where we are processing your personal data.

This privacy notice explains how we collect, store and use personal data about you.
The John Harrox Primary School is the 'data controller' for the purposes of data protection law.

Our data protection officer is Joe Lee.

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

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

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)

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)

Where we have got permission to use your data, you or your parents/carers may withdraw this at any time.
We will make this clear when we ask for permission, and explain how to go about withdrawing consent.
Some of the reasons listed above for collecting and using your information overlap, and there may be

several grounds which mean we can use your data.

How we store this data
We will keep personal information about you while you are a pupil at our school. We may also keep it after you have left the school, where we are required to by law.
We have a record retention schedule/records management policy which sets out how long we must keep information about pupils.

Data sharing
We do not share personal information about you 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
• Our regulator (the organisation or "watchdog" that supervises us), ([specify as appropriate, e.g. Ofsted, Independent Schools Inspectorate]
• Suppliers and service providers – so that they can provide the services we have contracted them for
• Financial organisations
• Central and local government
• Our auditors
• Survey and research organisations
• 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 you to the Department for Education (a government department) as part of data collections such as the school census.
Some of this information is then stored in the National Pupil Database, 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.
You can find more information about this on the Department for Education's webpage on how it collects and shares research data.
You can also contact the Department for Education if you have any questions about the database.

Your rights

You have a number of rights in relation to your personal data.
You are entitled to access any personal data we hold about you and you can also request a copy. To make a request for your personal data, please contact the school's Data Protection Officer (details provided below).

You can also request that we correct any personal data we hold about you that you believe is inaccurate; request that we erase your personal data; request that we stop processing all or some of your data and request that automated decisions are made by a person.

If we have asked for your consent to process your data, you have the right to withdraw that consent at any time.

We are obliged to consider and respond to any such request within one month. Whilst we shall make every effort to respond within a timely manner, please allow for exceptions to this time period during school holidays.

Complaints
We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we've done something wrong.
You can make a complaint at any time by contacting our data protection officer.

You can also complain to the Information Commissioner's Office in one of the following ways:
• 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:
• Joe Lee
• Email: dpo@ark.me.uk

Privacy notice for parents/carers – use of your child's personal data

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 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.
The John Harrox Primary School is the 'data controller' for the purposes of data protection law.
Our data protection officer is Joe Lee.

The personal 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, identification documents
• 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
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 this 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 only collect and use pupils' personal data when the law allows us to. Most commonly, we process it where:
• We need to comply with a legal obligation
• We need it to perform an official task in the public interest
Less commonly, 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)
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.
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.

How we store this data
We keep personal information about pupils while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. Our record retention schedule/records management policy sets out how long we keep information about pupils.

Data sharing
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:
• Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
• The Department for Education
• The pupil's family and representatives
• Educators and examining bodies
• Our regulator [specify as appropriate, e.g. Ofsted, Independent Schools Inspectorate]
• Suppliers and service providers – to enable them to provide the service we have contracted them for
• Financial organisations
• Central and local government
• Our auditors
• Survey and research organisations
• 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 as part of statutory data collections such as the school census and early years 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.

Parents and pupils' rights regarding personal data
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.

You have a number of rights in relation to your personal data.
You are entitled to access any personal data we hold about you and you can also request a copy. To make a request for your personal data, please contact the school's Data Protection Officer (details provided below).

You can also request that we correct any personal data we hold about you that you believe is inaccurate; request that we erase your personal data; request that we stop processing all or some of your data and request that automated decisions are made by a person.

If we have asked for your consent to process your data, you have the right to withdraw that consent at any time.

We are obliged to consider and respond to any such request within one month. Whilst we shall make every effort to respond within a timely manner, please allow for exceptions to this time period during school holidays.

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:
• Joe Lee
Email: dpo@ark.me.uk

Privacy notice for the Employees

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 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data. This privacy notice explains how we collect, store and use personal data about individuals we employ.

The John Harrox Primary School is the 'data controller' for the purposes of data protection law.
Our data protection officer is Joe Lee.

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
- Copy of driving licence
- Photographs
- 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 equalities monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body

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)
- We have legitimate interests in processing the data

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.

How we store this data

Personal data is stored in line with our data protection policy/records management policy.

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our record retention schedule/records management policy.

Data sharing

We do not share information about you with any third party without your 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 you with:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and [maintained schools only] information about headteacher performance and staff dismissals
- The Department for Education
- Your family or representatives
- Educators and examining bodies
- Our regulator [specify as appropriate e.g. Ofsted, Independent Schools Inspectorate]
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll
- Financial organisations
- Central and local government
- Our auditors
- Survey and research organisations
- Trade unions and associations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies
- Employment and recruitment agencies

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.

Your rights

You have a number of rights in relation to your personal data.
You are entitled to access any personal data we hold about you and you can also request a copy. To make a request for your personal data, please contact the school's Data Protection Officer (details provided below).

You can also request that we correct any personal data we hold about you that you believe is inaccurate; request that we erase your personal data; request that we stop processing all or some of your data and request that automated decisions are made by a person.

If we have asked for your consent to process your data, you have the right to withdraw that consent at any time.

We are obliged to consider and respond to any such request within one month. Whilst we shall make every effort to respond within a timely manner, please allow for exceptions to this time period during school holidays.

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 one of our data protection officers:
• Joe Lee
Email: dpo@ark.me.uk