

# Parents – Privacy Notice

## Our commitment to privacy

Harlington School is committed to the protection of all personal and sensitive data for which it holds responsibility as the Data Controller and the handling of such data in line with the data protection principles outlined in the General Data Protection Regulation (GDPR) and the Data Protection Act (2018). The school will monitor amendments to the legislation and implemented changes where required to remain compliant with all obligations.

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 our **students**.

Harlington's internal Data Protection Lead (DPL), who is your first point of contact for any queries or subject access requests, is Mr I Wells – Assistant Headteacher email: [iwells@harlingtonschool.org](mailto:iwells@harlingtonschool.org)

The schools Data Protection Officer role is supported by GDPR Sentry. Should you want to contact our Data Protection Officer please email: [info@gdprsentry.com](mailto:info@gdprsentry.com)

## The personal data we hold

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

- Student, parent and emergency contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests, including progress checks
- Curriculum records, such as options choices.
- Characteristics, such as ethnic background, country of birth, nationality, religion, eligibility for free school meals, or special educational needs
- Exclusion / behaviour information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Biometric data as part of our cashless catering service
- Safeguarding information
- Details of any support received, including care packages, plans and support providers

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- Photographs
- CCTV footage and images captured in school

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

## Why we use this data

We use this data to:

- Support student learning
- Monitor and report on student progress
- Provide appropriate pastoral care and protect student welfare
- Facilitate student participation in extra-curricular and enrichment activities
- Assess the quality of our services
- Administer admissions waiting lists
- Comply with the law regarding data sharing

## Our legal basis for using this data

We only collect and use students' 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 (ie it is needed to facilitate the effective education of your child)

Less commonly, we may also process students' personal data in situations 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)

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.

Where you have provided us with consent to use your data, you may withdraw this consent at any time by contacting your DPL in writing (or by email).

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## Collecting this information

While the majority of information we collect about students is mandatory, there is some information that can be provided voluntarily.

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 implications of not complying.

## How we store this data

We keep personal information about students while they are attending our school. In order to continue to comply with our legal obligations, we will retain some of the information once your child has left. Information will be destroyed in accordance with the Information and Records Management Society's Record Retention Guidelines (a copy of which is available on their website and a hardcopy may be requested from the Mr Wells – Assistant Headteacher).

## 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 students.

The School will facilitate access to a range of online tools in order to support the learning of our students. These include, but are not limited to: Frog, Kerboodle, My Maths.

In order to create students accounts, the school will share the full name, tutorial groups and school email address of the student. Informed consent will be obtained for the sharing of any further information.

The School will also routinely put information into the public domain in order to congratulate students on their individual achievements and to demonstrate the high standards of education being delivered at Harlington School. Such information may include photos included in the school prospectus and other marketing information, pictures of learning taking place around the school, information supplied via regular school newsletters, names in concert programmes etc. The School will, in all cases, remain conscious of its safeguarding responsibilities and will not share any personal information which will put a child at risk.

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## Photographs/film footage of students

The School will routinely take and retain a photo of every student in the school. This will be stored securely on our management information system (SIMS) and made available internally to staff to facilitate the delivery of education.

The photos are taken and supplied by the School's external photographer – currently Tempest Photography.

In order to facilitate the external assessment of students in some subjects (particularly drama and performing arts), the school is required to take film footage of assessed performance, and to supply this to exam boards for moderation.

The School respects the right of parents, and students to object to photographs being used to promote the school. Please complete the section at the end of this form to make your wishes known.

Under the Data Protection Act 2018, students over the age of 13 have the right to consent in their own right to the processing of their data, including photographs. A separate privacy notice has been prepared for students and the School will deliver some awareness training to students on data protection as part of its PSHE curriculum.

Whilst students over the age of 13 have the right to consent to their photos being taken and used, the School respects that some parents feel strongly on this issue. Where parents and students take a different view on whether photographs can be taken and used to promote the school, the presumption will be in favour of photos not being taken or used. In such a situation, parents and students will be asked to discuss the issue at home.

## Photographs/film footage of students

The School collects and hold biometric information on students in connection with its cashless catering system. Specific consent is sought to hold and process this information. Please see our Data Protection Policy (downloadable from the School website) for full details.

## National Pupil Database

We are required to provide information about students 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.

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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.

## Youth support services

Once our students reach the age of 13, we are legally required to pass on certain information about them to the London Borough of Hillingdon, as it has legal responsibilities regarding the education or training of 13-19 year-olds.

This information enables it to provide youth support services, post-16 education and training services, and careers advisers.

Parents/carers, can contact the DPL to request that we only pass the individual’s name, address and date of birth to the London Borough of Hillingdon in connection with these services. This right passes to the child once they reach the age of 16 years.

## 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.

## Parents and students’ 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 13), or where the child has provided consent. Where parents wish to make a request for a child over the age of 13 years, the School will routinely ask for evidence of the child’s consent to provide this data.

The School has prepared a Privacy Notice for students, which will be issued to all students at the start of Year 8, making them aware of their data protection rights. This document is downloadable from the School website.

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Parents also have the right to make a subject access request with respect to any personal data the school holds about them personally.

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 or your child
- 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

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request please contact the DPL.

Parents in maintained schools are entitled to a copy of their child's educational records under the Education (Pupil Information) (England) Regulations 2005.

## 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 the DPL.

## 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:

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- 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

*This notice is based on the Department for Education’s model privacy notice for students, amended for parents and to reflect the way we use data in this school.*

## Consent to use student photographs for wider marketing / promotional purposes

I have read the information above regarding how my child’s photograph will routinely be used. I understand that the school wishes to use photographs and video to support the learning of others, and to promote the school more widely. I understand that I have a right to object to such use, on behalf of my child.

I agree to give my permission for:

- photos of my child to be used for wider school publicity purposes ..... (tick here only if you agree)
- videos of my child to be used for school publicity purposes ..... (tick here only if you agree)
- videos of my child to be used to support the learning of others ..... (tick here only if you agree)

I understand that, once my child is aged over 13, they may exercise their data protection rights independently. Should my wishes, and those of my child, come into conflict, I understand that the School will ask us to discuss this issue at home, so that agreement may be sought within our family as to whether consent is given.

Student name: \_\_\_\_\_

Signed: \_\_\_\_\_ ( Parent / Carer)      Date \_\_\_\_\_