

# Privacy Notice for Parents/Carers

## Regarding the use of your child/ward's personal data

### 1. Introduction

- 1.1 Under data protection law, individuals have a right to be informed about how the Federation and its academies use any personal data that is held about them. We, Harris Federation, comply with this right by providing **Privacy Notices** to individuals where we are processing their personal data.

### 2. Document purpose

- 2.1 The purpose of this Privacy Notice is to explain how the Federation and its academies collect, store and use personal data about your child/ward.

### 3. Data controller and processors

- 3.1 Harris Federation is the data **Controller** for the purposes of data protection law and will therefore determine the purposes for which personal data is processed (the 'why' and the 'how'). Your academy and any authorised third parties e.g. ParentPay, process and 'use' data on behalf of the Federation i.e. under its supervision/control and are therefore data **Processors**.

- 3.2 The postal address of the Federation is:

Harris Federation  
4th Floor Norfolk House  
Wellesley Road, Croydon  
CR0 1LH

- 3.3 The Federation and its academies will ensure that your child/ward's personal data is processed fairly and lawfully, is accurate, is kept secure and is retained for no longer than is necessary.

### 4. Contact details

- 4.1 If you have any questions, concerns or would like more information about anything mentioned in this Privacy Notice please contact the Federation's Data Protection Officer (DPO) via [dpo@harrisfederation.org.uk](mailto:dpo@harrisfederation.org.uk) or in writing to the above address.

### 5. The categories of personal data we hold

- 5.1 We process data about the students who attend our academies. Personal data that we may collect, use, store and share (when appropriate) about your child/ward includes, but is not restricted to:
- **Personal information**, including name, unique student number, address and contact details of parent(s)/carer(s);
  - **Characteristics**, such as ethnicity, language, nationality, country of birth, religion and Free School Meal eligibility;
  - **Attendance information**, such as sessions attended, number of absences and absence reasons;

- **Information from social services**, such as safeguarding information or care status;
- **Test results and reports**, including National Curriculum assessment results (external) e.g. Key Stage 2 and GCSE, academy examination results (internal) and end of year term/year reports;
- **Special educational needs information**, including plans and support;
- **Medical conditions**, including physical and mental health or any disabilities a student may have, dental health, allergies, medication and dietary requirements;
- **Behaviour information**, such as exclusion information and any relevant alternative provision put in place;
- **Destinations** of where your child/ward intends moving on to once they've left the academy;
- **Other**, including photographs, CCTV images captured in academies and biometric data (in certain academies).

## 6. Why we use this data

### 6.1 We use this data to:

- support student learning;
- keep children safe i.e. for allergies or emergency contact details;
- monitor and report on student progress;
- provide appropriate pastoral care;
- assess the quality of our services;
- administer admissions waiting lists;
- protect vulnerable individuals;
- carry out education related research;
- prevent and detect crime;
- provide references for employment;
- meet the statutory duties placed upon us by the Department for Education.

## 7. Our lawful basis for using this data

### 7.1 We will only collect and use your child/ward's personal data when the law allows us to. Most commonly, we will process it where:

- we need to comply with a legal obligation;
- we need to perform an official task in the public interest i.e. in order to provide child/ward with an education.

### 7.2 Less commonly we may also use your child/ward's personal data where:

- we have obtained consent to use it in a certain way;
- we need to protect the individual's health interests.

### 7.3 Where we have obtained consent to use your child/ward's 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.

### 7.4 Some of the reasons listed above for collecting and using your child/ward's personal data overlap, and there may be several grounds which justify our use of this data.

## 8. Collecting this information

- 8.1 We collect pupil information from different sources and at different times, for example registration forms completed by parent(s)/carer(s) when children/wards start at the school.
- 8.2 Whilst the majority of information we collect about your child/ward is mandatory, there is some information that can be provided voluntarily. Whenever we seek to collect information from you or your child/ward, we will make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.
- 8.3 We may also receive information from previous schools, the Local Authority(s) and/or the Department for Education (DfE). For children/wards enrolling post 14 years of age, the Learning Records Service will give us the unique learner number (ULN) and may also give us details about your child/ward's learning qualification.

## 9. How we store this data

- 9.1 We keep personal data about your child/ward while they are attending one of our academies. We will also keep it beyond their attendance at one of our academies if this is necessary in order to comply with our legal obligations.
- 9.2 Personal data will not, however, be retained by the school for longer than necessary in relation to the purpose for which it was collected. We have a Records Retention Policy, which sets out how long we must keep information about your child/ward. You can request a copy from your Academy if you want to understand the timelines in more detail.

## 10. Data sharing

- 10.1 We do not share personal information about your child/ward with any third party without consent unless the law and our policies allow us to do so.
- 10.2 Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about your child/ward with:
- **The Local Authority** - to meet our legal obligations to share certain information with it, such as concerns about student's safety and exclusions or destination data;
  - **The Department for Education (DfE)** - to meet our legal obligations as part of data collections such as the School Census (more detail below);
  - **Your family or representatives** - in case of emergencies such as a health matter;
  - **Follow on schools** - which a student attends after leaving their current academy in the public interest of delivering education;
  - **Youth Support Services** - as it has legal responsibilities regarding the education or training of 13-19-year-olds;
  - **Educators and examining bodies** - necessary for the performance of our education function;
  - **Our regulator, Ofsted** - to enable it to evaluate the education we provide to your child/ward, which is in the public interest;
  - **Suppliers and service providers** - to enable them to provide the service we have contracted them for e.g. educational trip providers or Education Technology (EdTech) applications;
  - **Public Health England** - via local NHS Trusts for health data collections e.g. height and weight measurements, dental surveys, vaccinations, and vision and hearing screening in primary schools.
  - **Health and social welfare organisations / third parties** - to enable us to comply with our duty of care and statutory safeguarding duties for your child/ward's wellbeing, including:

- Therapists, clinical psychologists
- Academy medical staff / nurse
- School counsellors
- Child and Adolescent Mental Health Service (CAMHS)
- Safeguarding and Child Protection Software for Schools (CPOMS)
- Social care
- Academy Educational Welfare Officer (EWO)
- **Police forces, courts, tribunals** - in order to uphold law and order.

## 11. Department for Education

11.1 We are required to provide information about your child/ward to the Department for Education (a government department) as part of data collections, such as the School Census. To find out more about the student information we are required to share with the department, for the purpose of data collection, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

## 12. National Pupil Database

12.1 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.

12.2 You can find more information about the NPD at the following website:  
<https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

## 13. Data Sharing by the DfE

13.1 The law allows the DfE to share information from the database with other organisations / third parties 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. Such organisations include:

- schools;
- local authorities;
- researchers;
- other government departments and agencies;
- organisations fighting or identifying crime.

13.2 For more information about the Department's NPD data sharing process, please visit:  
<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

13.3 You can also contact the DfE online via <https://www.gov.uk/contact-dfe> if you have any questions about the database.

## 14. How to find out what personal information the DfE hold on your child

14.1 Under the terms of the Data Protection Act 2018, you are entitled to ask the Department:

- if they are processing you or your child personal data;
- for a description of the data they hold about your child;
- the reasons they're holding it and any recipient it may be disclosed to;

- for a copy of your personal data and any details of its source.

14.2 If you want to see the personal data held about your child by the Department, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:  
<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

## 15. Youth support services

- 15.1 Once your child/ward reaches the age of 13, we are legally required to pass on certain information about them to the local authority or youth support services provider in your area, as it has legal responsibilities regarding the education or training of 13-19-year-olds.
- 15.2 This information enables it to provide Youth Support Services, post-16 education and training services, and careers advice.
- 15.3 Parents/carers, or children once aged 16 or over, can contact their academy **Data Champion** to ask to request that we only pass the student's name, address and date of birth to your local authority or Youth Support Services provider.

## 16. Transferring data internationally

- 16.1 Where we share data with an organisation that is based outside the European Economic Area, we will do so in accordance with data protection law.
- 16.2 This would only happen if one of the student's parents/carers lives abroad or if the child/ward intends moving to a new school abroad. If this happens, we will be very careful to make sure that it is safe to transfer any student information. We will look at whether that other country has good data protection laws for example. If we cannot be sure that it is safe then we will talk to you, the child/ward's parent/carer, and make sure you are content for that information to be sent.

## 17. Photographs and media

- 17.1 As part of our school activities, we may take photographs and allow external organisations to take photographs or to film within our academies in line with our Photograph and Media Policy. Your child/ward will be made aware when this is happening and the context in which the photograph will be used.
- 17.2 An academy will take photographs for its own use. Usually these will be unnamed and will generally be for internal academy use, but may also include photographs for publication, such as:
- photographs included in an academy prospectus;
  - photographs to show as slides at an event for parents/carers;
  - photographs to be used on display boards, which can be seen by visitors to the school;
  - photographs posted on academy websites and official sites of Harris Federation, such as Twitter and Facebook accounts.
- 17.3 It is important to note that any photographs or video images that can be accessed by the public will be monitored closely by school staff to ensure they are appropriate.

- 17.4 Named photographs will be used for internal use where there is a clear lawful basis for doing so e.g. for identification purposes such as a student, staff or visitor security pass, safeguarding requirements and as part of exclusion behaviour data.
- 17.5 For all other purposes, if an academy wants to use named photographs then it will obtain specific parent/carer or student consent first. For students at Primary academies consent will be sought from parents/carers and at Secondary/Sixth Form academies this will most likely be student consent. However, when student consent is sought the parental wishes will be taken into account wherever possible.

## 18. CCTV

- 18.1 The majority of our academies operate CCTV on their premises. This is considered necessary to protect staff and student's safety and Federation property. Where CCTV is in operation it will be clearly sign posted.

## 19. Biometrics

- 19.1 At many of our academies a biometric recognition system is used, for example for the purchase of food in the canteen. All such data collected will be processed in accordance with GDPR data protection principles and the Protection of Freedoms Act 2012.
- 19.2 The written consent of at least one parent/carer is required before biometric data is taken and used, which is a mandatory requirement. If one parent/carer objects in writing, then the academy will not take or use a child's biometric data.
- 19.3 For more information about biometric data please refer to the ICO Guidance at the link below: <https://www.gov.uk/government/publications/protection-of-biometric-information-of-children-in-schools>.

## 20. Requesting access to your personal data

- 20.1 Individuals have a right to make a 'subject access request' to gain access to the personal information that we hold about them.
- 20.2 Parent(s)/carer(s) can make a request with respect to their child/ward's data where the child/ward is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child/ward has provided consent for this.
- 20.3 Parent(s)/carer(s) also have the right to make a Subject Access Request with respect to any personal data the academy holds about them.
- 20.4 If you want to make a request, please contact your academy **Data Champion** in the first instance or ask your child/ward's tutor if you are unsure who this is.

## 21. Other rights

- 21.1 Under data protection law, individuals have certain other 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;
- to seek redress, either through the Information Commissioner's Office (ICO) or through the courts.

21.2 If you wish to exercise any of these rights, please contact your academy **Data Champion** in the first instance. Alternatively, you can contact the Federation's **Data Protection Officer** via [dpo@harrisfederation.org.uk](mailto:dpo@harrisfederation.org.uk).

21.3 You are not required to pay any charge for exercising your rights. If you make a request, we have **one month** to respond to you.

## 22. Complaints

22.1 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 the Federation's DPO in the first instance.

22.2 Alternatively, you can make a complaint to the Information Commissioner's Office (ICO) if you are unhappy with how we have used your data. The ICO's address and contact details are listed below:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>