



**BELONG**

CE Multi Academy Trust

# Privacy Notice: Parents & Carers Data



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## 1. Introduction

Under UK data protection law, individuals have a right to be informed about how our school, and the multi-academy trust we are part of, 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 **parents and carers of pupils at our school**.

Our trust, Belong CE Multi Academy Trust, is the 'data controller' for the purposes of UK data protection law.

## 2. The personal data we hold

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

- Contact details and contact preferences (such as your name, address, email address and telephone numbers)
- Bank details
- Details of your family circumstances
- Details of any safeguarding information including court orders or professional involvement
- Records of your correspondence and contact with us
- Details of any complaints you have made
- Information about your use of our information and communication systems, equipment and facilities (e.g. school computers)

We may also collect, use, store and share (when appropriate) information about you that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Information about any health conditions you have that we need to be aware of

- Photographs and CCTV images captured in school
- Information about your religion, as part of our admission arrangements

We may also hold data about you that we have received from other organisations, including other schools and local authorities.

### 3. Why we use this data

We collect and use the data listed above to:

- a) Report to you on your child's attainment and progress
- b) Keep you informed about the running of the school (such as emergency closures) and events
- c) Process payments for school services and clubs
- d) Provide appropriate pastoral care
- e) Protect pupil welfare
- f) Administer admissions waiting lists
- g) Assess the quality of our services
- h) Carry out research
- i) Comply with our legal and statutory obligations
- j) Make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely

We will only use your personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

#### 3.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by selecting the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

#### 3.2 Use of your personal data in automated decision-making and profiling

We do not currently process any parents' or carers' personal data through automated decision-making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

#### 3.3 Use of your personal data for filtering and monitoring purposes

While you're in our school, we may monitor your use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations

- Comply with our policies (e.g. child protection policy, IT acceptable use policy) and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)
- Protect your child's welfare

#### 4. Our lawful basis for using this data

Our lawful bases for processing your child's personal data for the purposes listed in Section 3 above are as follows:

##### *Public Task*

We process data under the 'public task' basis where it is necessary to carry out our official functions as a school, in the public interest. This applies to purposes:

- **a) Support pupil learning**
- **b) Monitor and report on pupil progress**
- **c) Provide appropriate pastoral care**
- **d) Protect pupil welfare**
- **e) Assess the quality of our services**
- **f) Administer admissions waiting lists**
- **i) Comply with the law regarding data sharing**

This processing is supported by legislation including:

- The Education Act 1996
- The Education (Pupil Information) (England) Regulations 2005
- The Children Act 1989 and 2004
- The Equality Act 2010
- Keeping Children Safe in Education (statutory guidance)
- The School Admissions Code

##### *Legal Obligation*

We process data under the 'legal obligation' basis where we are required to do so by law. This applies to purposes:

- **d) Protect pupil welfare**
- **i) Comply with the law regarding data sharing**
- **j) Ensure appropriate, legal and safe use of school systems and facilities**

Relevant legislation includes:

- The Data Protection Act 2018
- The Children Act 1989 and 2004
- The Health and Safety at Work Act 1974
- Prevent Duty (Counter-Terrorism and Security Act 2015)
- Keeping Children Safe in Education

### *Consent*

We rely on consent for purposes where data use is optional and not required by law or public task. This applies to:

- **3.1 Use of your child's personal data for marketing purposes**

We will always seek your explicit consent before using your child's data for these purposes. You may withdraw consent at any time.

### *Vital Interests*

We may process data under the 'vital interests' basis in life-or-death situations, for example:

- **d) Protect pupil welfare**

This would only apply in emergency circumstances where consent cannot be obtained.

### *Contract*

This basis may apply in limited circumstances, such as:

- **g) Carry out research** (if commissioned under a contract)
- **h) Administer school property** (e.g. where a pupil is party to a hire or use agreement)

### *Legitimate Interests*

We may process data under the 'legitimate interests' basis where there is minimal impact on privacy and a compelling reason to do so. This applies to:

- **e) Assess the quality of our services**
- **g) Carry out research**
- **j) Ensure appropriate, legal and safe use of school systems and facilities**

Our legitimate interests include:

- Improving educational outcomes
- Promoting pupil wellbeing
- Ensuring the safety and integrity of our IT systems
- Supporting the development of inclusive and effective school practices

## **4.1 Our basis for using special category data**

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and 1 of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims

- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

## 5. Collecting this data

We will only collect and use your data when the law allows us to (as detailed above in section 4 of this notice). While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Your children
- Police forces, courts or tribunals
- Other schools or trusts

## 6. How we store this data

We keep personal information about you while your child is attending our school. We may also keep it beyond their attendance at our school if this is necessary to comply with our legal obligations or to meet our regulatory requirements. Our record retention schedule sets out how long we keep information about parents and carer (this can be found on our trust website [www.belongce.org.uk](http://www.belongce.org.uk)).

We have put in place appropriate security measures to prevent your personal information being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer have a requirement to retain it.

## 7. Who we share data with

We do not share information about you 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 UK data protection law), we may share personal information about you with:

- Our local authority, Liverpool City Council – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions
- Government departments or agencies
- Department for Education
- Our regulator: e.g. Ofsted
- Suppliers and service providers: e.g. catering, HR, filtering and monitoring
- Financial organisations
- 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 or tribunals
- Schools that your child may attend after leaving us

### 7.1 Transferring data internationally

We may share personal information about your child with the following international third parties, where different data protection legislation applies. These transfers are made with appropriate safeguards to ensure your child's data is protected, in accordance with UK data protection law and our commitment to their dignity, safety, and flourishing.

#### 1. App and Cloud Server Providers

Some of the educational platforms and cloud-based services we use store data in countries outside the UK. For example:

- **Google Workspace for Education** – data may be stored in the United States. Transfers are made under the UK Government's adequacy regulations for the US (via the UK Extension to the EU-US Data Privacy Framework).
- **Microsoft 365** – data may be stored in the EU or US. Transfers are made under adequacy regulations or standard contractual clauses (SCCs) approved by the UK Information Commissioner's Office (ICO).

#### 2. Educational Platforms

- **ClassDojo** – used for classroom communication and pupil engagement. Based in the United States. Transfers are made under SCCs and the platform's compliance with UK GDPR standards.

Where we transfer your child's personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

## 8. Your rights

### 8.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- Give you a description of it
- Tell you why we are holding it, how we are 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 us (see 'Contact us' below).

### 8.2 Your other rights regarding your data

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data where it is likely to cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected or blocked
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:



- Your right to have all personal data deleted or destroyed doesn't apply when the lawful basis for processing is legal obligation or public task
- Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests
- Right to object to use of your private data doesn't apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent

See information on types of lawful basis in section 4 of this privacy notice.

To exercise any of these rights, please contact us (see 'Contact us' below).

## 9. 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 concerns about our data processing, please raise this with us in the first instance. You can make a complaint to us at any time by contacting [contactus@belongce.org.uk](mailto:contactus@belongce.org.uk)

Alternatively, you can make a complaint at any time to the Information Commissioner's Office:

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

## 10. Contact us

If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

- [contactus@belongce.org.uk](mailto:contactus@belongce.org.uk)

Our trust data protection officer is:

- Leon Tootle

However, our **data protection lead** has day-to-day responsibility for data protection issues in our school.

If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact the schools directly.