

## **Privacy notice for parents and carers – how we use your personal data**

Under data protection law, individuals have a right to be informed about how the Unity Schools Partnership (“the Trust”) uses any personal data 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.

We, Unity Schools Partnership, Park Road, Haverhill, Suffolk CB9 7YD, are the ‘data controller’ for the purposes of data protection law. The Data Protection Officer for the Trust can be contacted at [dpo@unitysp.co.uk](mailto:dpo@unitysp.co.uk).

### **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

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 (more details about this are in our combined data protection and freedom of information policy, which is available on the trust’s website)

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

### **Why we use this data**

We use this data to:

- a) Report to you on your child’s attainment and progress
- b) Keep you informed about the running of our schools (such as emergency closures) and events
- c) Process payments for 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

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

Where you have given us consent to do so, we may send you marketing information promoting events, campaigns, charitable causes or services that may be of interest to you. You can withdraw consent or 'opt out' of receiving these by contacting the data protection lead at your child's school - the school office should be able to provide you with their contact details – or the trust's data protection officer.

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

We do not currently process any 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.

### **Our lawful basis for using this data**

Our lawful bases for processing your personal data for the purposes listed above are as follows:

Under the General Data Protection Regulation (EU) 2016/679 (GDPR), the lawful bases we rely on for processing your information are:

- for purposes (a), (e) & (f) the legal basis of 'legal obligation' – we need to process data to meet our responsibilities under law as set out here:
  - for purpose (a): The Education (Pupil Information) (England) Regulations 2005
  - for purpose (e): Keeping children safe in education – Statutory guidance for schools and colleges
  - for purpose (f): The Schools Admissions Code
- for purposes (b), (d) & (g) the legal basis of 'public task': collecting the data is necessary to perform tasks that we are required to perform as part of our statutory function
- for purpose (c) the legal basis of 'contract': we need to process personal data to fulfil a contract with you or to help you enter into a contract with us
- for purpose (h) the legal basis of 'consent': the data subject has given consent to the processing of their personal data for one or more specific purposes

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

### **Collecting this information**

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 will 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, tribunals

### **How we store this data**

We keep personal information about you while your child is attending one of our schools. We may also keep it beyond their attendance at one of our schools if this is necessary. Our records retention policy sets out how long we keep information about parents and carers, it is available on the trust's website

### **Data sharing**

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 data protection law), we may share personal information about you with:

- Local authorities – to meet our legal obligations to share certain information, such as safeguarding concerns and information about exclusions
- Government departments or agencies
- Our regulator, Ofsted
- Suppliers and service providers (such as ParentPay, ParentMail, Class Dojo, Go4Schools, SchoolComms and SIMS InTouch) to enable them to provide the service we have contracted them for
- 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 and tribunals

### **Transferring data internationally**

We may share personal information about you with the following international third parties outside of the European Economic Area, where different data protection legislation applies:

- ClassDojo – a free communication platform based in the United States of America which complies with the EU (European Union) Standard Contractual Clauses

If 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**

#### **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 apply):

- 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
- 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 our data protection officer.

### **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
- Prevent your data being used to send direct marketing
- Object to 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, deleted or destroyed, or restrict processing
- In certain circumstances be notified of a data breach
- Make a complaint to the Information Commissioner's Office (ICO)
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

### **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 (ICO):

- 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** at [dpo@unitysp.co.uk](mailto:dpo@unitysp.co.uk)