



# NPAT PARENT/CARER PRIVACY NOTICE

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## 1. INTRODUCTION

We are Northampton Primary Academy Trust (NPAT). During your child's time at one of our schools, we will gather and use information relating to you.

Information that we hold in relation to individuals is known as their "personal data". This will include data that we obtain from you directly and data about you that we obtain from other people and organisations.

We might also need to continue to hold your personal data for a period of time after your child has left an NPAT school. Anything that we do with an individual's personal data is known as "processing".

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' to individuals where we are processing their personal data.

This privacy notice explains what personal data we will hold about you, why we process that data, who we share this information with, and your rights in relation to your personal data processed by us.

Our Trust, Northampton Primary Academy Trust, Headlands Primary School, Bushland Road, Northampton, NN3 2NS, is the 'data controller' for the purposes of UK data protection law.

Our Data Protection Officer, Angela Corbyn, is contactable by email at:

[DPO@npatschools.org](mailto:DPO@npatschools.org)

## 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 and emergency contact details)
- Financial details such as bank account details and other financial details such as eligibility for free school meals or other financial assistance.
- Details of your family circumstances and support received, including plans
- 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 hold data you that we have received from other organisations, such as other schools, local authorities, and the Department for Education

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
- Characteristics (such as ethnicity, language and religion)
- Photographs and CCTV images captured when you attend NPAT schools.
- For faith schools: 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 social services.

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

### 3. WHY WE USE THIS DATA

We will process your personal data for the following reasons:

1. Where we are required by law, including:
  - To provide reports and other information required by law in relation to the performance of your child
  - To raise or address any concerns about welfare and safeguarding
  - To the Government agencies including the police
  - To obtain relevant funding for the school
  - To provide or obtain additional services including advice and/or support for your family
  - To keep you informed about the running of the school (such as emergency closures and events)
  - To process payments for school services and clubs

- To make sure our information and communication systems, equipment and facilities are used appropriately, legally and safely.
- To comply with our legal and statutory obligations.
- Administer admissions waiting lists
- Assess the quality of our services
- Carry out research
- Communicate details of events and opportunities for pupils provided in the wider community and / or the Parent Teacher Association (PTA) or equivalent of the school.

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

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

- We need to comply with a legal obligation
  - We need it to perform an official task in the public interest as part of our functions as a Trust
  - 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 the processing is necessary in order to ensure your health & safety on the school site, including making reasonable adjustments any disabilities you may have
  - We have a legitimate interest
2. Where the law otherwise allows us to process the personal data as part of our functions as a Trust or we are carrying out a task in the public interest, including:
- To confirm your identity
  - To communicate matters relating to the Trust to you
  - To safeguard you, our pupils and other individuals
  - To enable payments to be made by you to the Trust
  - To ensure the safety of individuals on the Trust sites
  - To aid in the prevention and detection of crime on the Trust sites
  - To enable the education of our pupils

- To fulfil our duty of care to our pupils

### 3. Where we otherwise have your consent

Whilst the majority of processing of personal data we hold about you will not require your consent, we will inform you if your consent is required and seek that consent before any processing takes place.

## **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 or trust-wide 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 clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting the school office

## **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.

## **Our lawful basis to use special category personal 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

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

## 4. 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 in order to comply with our legal obligations. Our record retention schedule and records management policy set out how long we keep information about parent and carers. Our policies can be found on our school website and the trust website.

We have put in place appropriate security measures to prevent your personal information from 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 need it

## 5. 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 routinely share personal information about you with::

- Local authorities, to assist them in the exercise of their responsibilities in relation to education and training, youth support and safeguarding purposes
- The Department for Education in compliance with legal obligations of the school to provide information about students and parents as part of statutory data collections
- Our regulator, Ofsted
- Government departments or agencies
- Schools that the pupils attend after leaving us
- Educators and examining bodies
- Law enforcement agencies and bodies (including Courts and Tribunals) and;
- Suppliers and service providers who we contract to support us in our legal duties to educate and safeguard pupils – to enable them to provide the service we have contracted them for.
- Our auditors
- Professional advisors and consultants

### DEPARTMENT FOR EDUCATION (DfE)

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our pupils with the Department for Education (DfE)

either directly or via our local authority for the purpose of those data collections for things such as:

**School census:** regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

All data is transferred securely and held by the Department for Education (DfE) under a combination of software and hardware controls, which meet the current [government security policy framework](#).

For more information, please see 'How Government uses your data' section. For privacy information on the data the Department for Education collects and uses, please see: <https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3>

and

<https://www.gov.uk/government/publications/privacy-information-key-stage-4-and-5-and-adult-education>

The Department for Education may share information that we are required to provide to them with other organisations. For further information about the Department's data sharing process, please visit: <https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>.

Contact details for the Department can be found at <https://www.gov.uk/contact-dfe>.

Local authorities may share information that we are required to provide to them with other organisations. For further information please refer to the relevant Local Authority privacy notices.

## 6. TRANSFERRING DATA INTERNATIONALLY

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

## 7. YOUR RIGHTS

You have the right to request access to personal data that we hold about you, subject to a number of exceptions. To make a request for access to your personal data, you should contact:

[dpo@npatschools.org](mailto:dpo@npatschools.org)

Please also refer to our Subject Access Request Policy, available on the Trust website, for further details on making requests for access to your personal data.

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called ‘right to be informed’.
- the right to ask us to change any information you think is not accurate or complete – this is called ‘right to rectification’.
- the right to ask us to delete your personal information – this is called ‘right to erasure’
- the right to ask us to stop using your information – this is called ‘right to restriction of processing’.
- the ‘right to object to processing’ of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to [complain to the Information Commissioner](#) if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don’t haven’t the right to object, but you have the right to withdraw consent.
- If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner’s Office at [raise a concern with ICO](#).
- For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the ‘How Government uses your data’ section of this notice.

If you want to exercise any of these rights then you should contact [dpo@npatschools.org](mailto:dpo@npatschools.org)

The law does not oblige the Trust to comply with all requests. If the Trust does not intend to comply with the request then you will be notified of the reasons why in writing.

## 8. CONCERNS

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.

Please contact: Data Protection Officer – email: [dpo@npatschools.org](mailto:dpo@npatschools.org)

Alternatively, you can make a complaint 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