



## **Privacy notice for parents and carers – use of your child’s personal data**

|                    |                 |                        |         |
|--------------------|-----------------|------------------------|---------|
| <b>Approved by</b> | Helen Abell CEO |                        |         |
| <b>Date</b>        | September 2026  | <b>Next review due</b> | 09/2027 |

## Summary of Changes

| Version | Date           | Summary of Changes                                                                                   | Approved By         |
|---------|----------------|------------------------------------------------------------------------------------------------------|---------------------|
| 1       | August 2022    | Use of template provided by the Key/Forbes solicitors                                                | Dr Martin Young CEO |
| 2       | September 2022 |                                                                                                      | Dr Martin Young CEO |
| 3       | September 2023 | Addition of Iver Village Infant Academy                                                              | Dr Martin Young CEO |
| 4       | February 2024  | Addition of Hannah Ball Academy                                                                      | Dr Martin Young CEO |
| 5       | July 2024      | 3.3 Use of your personal data for filtering and monitoring purposes                                  | Dr Martin Young CEO |
| 6       | August 2025    | Section 7 expanded                                                                                   | Dr Martin Young CEO |
| 7       | September 2026 | Updates from the Key and Forbes solicitors' expansion of 3.0, 5.0, 7.1, 8.2 and 8.3<br>Change of CEO | Helen Abell CEO     |

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## 1. Introduction

Under UK data protection law, individuals have a right to be informed about how our trust/academy 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 **children at our academy**.

This privacy notice applies while we believe your child is not capable of understanding and exercising their own data protection rights.

Once your child is able to understand their rights over their own data (generally considered to be age 12, but this has to be considered on a case-by-case basis), you should instead refer to our privacy notice for pupils to see what rights they have over their own personal data. Further details are available from our DPO.

Our trust, The Park Federation Academy Trust, C/O James Elliman Academy, Elliman Avenue, Slough, Berkshire, telephone number 0203 096 9754, is the 'data controller' for the purposes of UK data protection law.

Our data protection officer is Jas Sohal (see 'Contact us' below).

The academies within the Trust are:

| Hillingdon Local Authority | Slough Local Authority   | Buckinghamshire             |
|----------------------------|--------------------------|-----------------------------|
| Cranford Park Academy      | Godolphin Junior Academy | Iver Village Infant Academy |
| Lake Farm Park Academy     | James Elliman Academy    | Hannah Ball Academy         |
| West Drayton Academy       | Montem Academy           |                             |
| Wood End Park Academy      | Western House Academy    |                             |

## 2. The personal data we hold

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

- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Details of behaviour issues or exclusion information
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Information about your child's use of our information and communications systems, equipment and facilities (e.g. school computers) and other IT communications

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

- Any medical conditions we need to be aware of, including physical and mental health
- Photographs and CCTV images
- Information about characteristics, such as ethnic background or special educational needs

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

## 3. Why we use this data

We use the data listed above to:

- a) Support pupil learning and meet legal requirements placed upon us
- 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
- g) Carry out research
- h) Comply with the law regarding data sharing
- i) 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 child's personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for any other reason and that reason is incompatible with the original purpose. If we need to use your child's personal information for an unrelated purpose, we will notify you and explain the legal basis that allows us to do so.

Please note that we may process your child's 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 child's 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 academy 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 your academy.

### **3.2 Use of your child's 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.

### **3.3 Use of your child's personal data for filtering and monitoring purposes**

While your child is in in our trust/academy, we may monitor their 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 policies) 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 personal data for the purposes listed in section 3 above are as follows:

- In accordance with the 'public task' basis – we need to process data to fulfil our statutory function as an academy
  - In accordance with the 'legal obligation' basis – we need to process data to meet our responsibilities under law
  - In accordance with the 'consent' basis – we will obtain consent from you to use your personal data
- In accordance with the 'vital interests' basis – we will use this personal data in a life-or-death situation
- In accordance with the 'contract' basis – we need to process personal data to fulfil a contract with you or to help you enter into a contract with us
- In accordance with the 'legitimate interests' basis – where there's a minimal privacy impact and we have a compelling reason

Where you have provided us with consent to use your child's data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

#### **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 one of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your child's 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 child's 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 your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your child's 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 child's information when the law allows us to as detailed above in section 4 of this notice. While the majority of information we collect about your child 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
- Police forces, courts, tribunals
- Other schools or trusts
- Department for Education (DfE)

## 6. How we store this data

We keep personal information about your child while they are attending our academy. We may also keep it beyond their attendance at our academy if this is necessary. Our record retention policy is based on guidance provided by IRMS Records Management Toolkit for Schools which sets out how long we keep information about children.

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

We will dispose of your child's personal data securely when we no longer need 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 your child with:

- Schools that you may attend after leaving us
- The local authority – 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, Ofsted
- Our youth support services provider
- Suppliers and service providers – to enable them to provide the service we have contracted them for:
  - Catering company and support parties for payments
  - Management Information System and other support companies that will enhance teaching and learning outcomes
  - External clubs you may use
  - Filtering and monitoring
- Financial organisations
- Our auditors and internal scrutiny partners
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

We reserve the right to share relevant safeguarding concerns, reports, and personal data with external statutory agencies (such as Children's Social Care, the Police, and the Local Authority Designated Officer) without prior parental notice or consent where informing parents could place a child at risk of harm or prejudice a child protection investigation.

### Sharing Data with the Department for Education (DfE)

The Department for Education (a government department) collects personal data from schools and local authorities via various statutory data collections. We are required to share information about our pupils with the DfE either directly or via our local authority, via various statutory data collections.

The data shared will be in line with the following legislation:

- Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013

The data is transferred securely and held by the Department for Education under a combination of software and hardware controls that meet the current government security policy framework.

The data we share about you with the Department for Education is used for a number of different purposes, including to:

- Inform funding
- Monitor education policy and school accountability
- Support research

The information shared with the Department for Education about you could include:

- Your name and address
- Your unique pupil number
- Pupil matching reference numbers
- Details of your gender or ethnicity
- Details of any special educational needs (SEN)
- Details of schools attended
- Absence and exclusion information
- Information relating to exam results
- Information relating to any contact with children's services
- What you have done since finishing school

Please note: this list is not exhaustive.

### **National Pupil Database**

We are required to provide information about children to the Department for Education as part of statutory data collections such as the school census and early year's census.

Some of this information is then stored in the [National Pupil Database](#) (NPD), which is owned and managed by the Department for Education 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.

The Department for Education may share information from the NPD with third parties, such as other organisations which promote children's education or wellbeing in England. These third parties must agree to strict terms and conditions about how they will use the data.

For more information, see the Department for Education's webpage on [how it collects and shares personal data](#).

You can also [contact the Department for Education](#) with any further questions about the NPD.

## **7.1 Transferring data internationally**

We may share personal information about your child with international third parties, (organisations, companies, etc, that are based outside the UK), where different data protection legislation applies. For example:

- Other schools or educational establishments
- Government departments or agencies
- Security organisations
- App or cloud server providers
- Filtering and monitoring providers

Where we transfer your 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, we will undertake a risk assessment.

## **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 your child.

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 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

The right of access (Subject Access Requests) under UK GDPR does not automatically grant parents access to child protection or safeguarding records. In line with Schedule 2 and Schedule 3 of the Data Protection Act 2018, access to safeguarding information will be restricted or withheld where disclosure would be likely to cause serious harm to the physical or mental health of any individual, breach a child's reasonable expectation of confidentiality, or compromise an ongoing safeguarding inquiry.

You may also have the right for your child's 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).

Once your child is able to understand their rights over their own data (generally considered to be age 12, but this has to be considered on a case-by-case basis), we will need to obtain consent from your child for you to make a subject access request on their behalf.

### **8.2 Your right to access your child's educational record**

There is no automatic parental right of access to the educational record, however if parents wish to request this then they should discuss this with the Principal in the first instance.

There are certain circumstances in which this right can be denied, such as if releasing the information might cause serious harm to the physical or mental health of the pupil or another individual, or if it would mean releasing exam marks before they are officially announced.

### **8.3 Your other rights regarding your child's data**

Under UK 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 child's personal data
- Prevent your child's data being used to send direct marketing
- Object to and challenge the use of your child's personal data for decisions being taken by automated means (by a computer or machine without human oversight, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about your child deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your child's 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

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

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 concern about our data processing, please raise this with us in the first instance.

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

## 10. 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 (DPO)**:

- Jas Sohal, DPO, The Park Federation Academy Trust, C/O James Elliman Academy, Elliman Avenue, Slough, Berkshire, SL2 5BA