

## GENERAL PRIVACY NOTICE

We ask that you read this privacy notice carefully as it contains important information about who we are and how and why we collect, store, use and share personal information. It also outlines your rights in relation to your personal information and lets you know how to contact us and/or supervisory authorities should you have a complaint.

### Who we are

Bussage Primary School collects, uses and is responsible for certain personal information about you. In doing so, we are regulated under the [General Data Protection Regulation](#) and other applicable regulations following the end of the UK's transition period on 31<sup>st</sup> December 2020 which applies across the European Union and the United Kingdom and we are responsible as 'controller' of that personal information for the purposes of those laws.

This notice is designed to inform data subjects who the school interacts with, including suppliers, volunteers, governors, and any others we interact with, such as visitors to our school or this website. [Insert name of school] has four linked but separate data privacy notices which can be found on our website: (a) data privacy for students and (b) data privacy notice for parents (c) data privacy for staff and (d) data privacy for job applicants.

## The personal information we collect and use

### Information we collect

In the course of running our school we collect information from our suppliers, volunteers, governors and any others we interact with, such as visitors to our school or this website.

- Our website uses cookies. A cookie is a small file of letters and numbers that we put on your computer if you agree. These cookies allow us to distinguish you from other users of the website which helps us to provide you with a good browsing experience and improve our site
- When communicating with you we collect contact details, including name, address, email, telephone number
- Limited financial information
- Other relevant information which allows us to maintain good relationships with all those who interact with us (car registration numbers for visitors to our site, for example)
- We do not routinely collect special category data about those to whom this notice relates. However, there are some circumstances where we may. For example: when holding an event at the school we would ask participants for health information so that we can make sure everyone in the school is safe. Or, where we require a DBS certificate for an individual we might process limited special category data or data relating to criminal convictions
- We use CCTV in some locations on some school sites to ensure that they remain safe. We will adhere to the ICO's [code of practice](#) for the use of CCTV

- We do not need to ask individuals' permission to use CCTV, but we make it clear where individuals are being recorded. Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use.

## How we use your personal information

We use your personal information for a variety of reasons – each associated with the smooth running of the school and to maintain good relationships with everyone we come into contact with:

**Communications:** we process contact details including name, address, email and telephone numbers so that we can communicate effectively through a variety of media including by email and post.

**Finance:** we process limited financial information so that, for example, we can pay our suppliers and collect payments.

**Safeguarding:** we process certain personal information – such as passport details – when undertaking checks about anyone who visits the school. This helps us to ensure that our students, staff and visitors remain safe. Furthermore, in the interest of safety, we will also occasionally process necessary health data (if we are providing food at an event, we would ask for any food allergies, for example).

**Due diligence:** to confirm the identity and status of prospective governors and suppliers of goods and services, including their background and relevant interests.

**IT Security:** to monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's IT policies and procedures.

**Governance and record keeping:** the school processes personal data about our governors and the meetings that they attend so that we can maintain necessary and good records.

**Enable relevant authorities:** to monitor the school's performance and to intervene or assist with incidents as appropriate.

The school also processes personal data where it is otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice.

## Reasons we can collect and use your personal information

The law on data protection sets out a number of different reasons for which we may collect and process your personal data. Some of these reasons, set out below, are the bases we have for processing your personal data:

### Contractual obligations

In certain circumstances, we need your personal data to comply with our contractual obligations.

We need to collect and retain your contact details so we can, for example:

- Enter into contract with you to supply us with goods or services

## **Legal obligations**

If the law requires us to, we may need to collect and process your data to comply with certain legislative provisions. We are also obliged to retain certain information for HMRC and Department of Education reporting purposes.

## **Legitimate interest**

In particular circumstances, we require your personal information to pursue our legitimate interests in a way which might reasonably be expected as part of running our school and which does not materially impact your rights, freedom or interests.

For example, so that we can create continuity in relationships, we retain some supplier information for seven years beyond any formal contract period.

## **Consent**

In specific situations, we can collect and process your data with your consent.

For example, when you receive email newsletters or updates about events in the school.

When collecting your personal data we will always make it clear what data is necessary in connection with a particular service, and give you a clear and simple option to unsubscribe or withdraw consent at any time. To update your preferences, you can contact the school office or our Data Protection Officer.

## **Special Category Data**

Occasionally we have sight of special category information. We only do this with the explicit consent of the data subject or where another legal ground applies.

## **Who we share your personal information with**

### **Data Processors**

We sometimes share your personal data with trusted third parties who act only on our instruction (known as “data processors”).

Data processors might be, for example, companies who store data for us (i.e. our IT service suppliers).

Where we share information with these companies or individuals we make sure that they also keep your data secure and protect your rights. To this end, we make sure that:

- We provide only the information they need to perform their specific services
- They may only use your data for the exact purposes we specify in our contract with them, or where their terms and conditions of processing contain the correct data processor clauses under GDPR
- If we stop using their services, any of your data held by them will either be deleted or rendered anonymous.

## **Joint controllers**

We share personal information with other organisations, such as HMRC, Ofsted, Local Authority.

We will only do this in very specific circumstances, for example:

- With your consent
- Where we have a contract in place with the other party
- Where we are obliged to share the information for legal reasons

We will share personal information with law enforcement or other authorities if required by applicable law.

## **How long your personal information will be kept**

The school will retain personal data securely and for as long as it is necessary for a legitimate and lawful reason. This will be in accordance with accepted schools record management guidelines. In the context of our school, this all means that we retain most personal information for up to five years after any contract has ended so that we can maintain good working relationships with suppliers – amongst others – and in order to comply with legal requirements for HMRC reporting. However, incident reports and any information in, for example, child protection issues or safeguarding alerts, will need to be kept for much longer and in accordance with specific legal requirements.

## **HOW WE KEEP YOUR DATA SAFE**

We are aware of the need to maintain the correct and highest level of security when processing your personal information. We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed without authorisation.

We take the following steps to maintain the security of your personal information:

- We keep all of your information in systems that have the appropriate security levels for the data we process, and our servers are based in the UK
- We use appropriate encryption technology when backing up data
- We limit access to your personal information to those who have a genuine need to know it
- We have password protected systems and devices are encrypted as appropriate
- Any data which is accessed off site or on a mobile device is kept locked when not in use and never left unattended
- We have a range of procedures in place to keep all data secure – for example, we have an Acceptable Use Policy
- All paper records are kept in locked filing cabinets in our offices which are alarmed and secure
- Data is access controlled

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## Where your data is processed

We do not routinely transfer data outside of the UK or the EEA. However, from time to time we may pass personal data, such as your name and email address, to our other services when sending communications electronically. Consequently, your personal data will remain in the EU or countries considered by the EU to have equivalent protections – i.e. those that have “adequacy determinations” in their favour, such as Jersey, Guernsey, Switzerland, New Zealand and Canada. Companies based in the USA which store or process data in the USA will have appropriate security measures in place.

If you would like further information please contact our Data Protection Officer at [antonia.noble@icloud.com](mailto:antonia.noble@icloud.com).

## Your rights

Under the [General Data Protection Regulation](#) you have a number of important rights free of charge. In summary, those include:

- Fair processing of information and transparency over how we use your personal information
- Access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address
- Correcting any mistakes in your information that we hold
- The erasing of personal information concerning you in certain situations
- Receiving personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit that data to a third party in certain situations
- Objecting at any time to the processing of personal information concerning you for direct marketing
- Objecting to decisions being taken by automated means which produce legal effects concerning you or similarly significantly affect you
- Objecting in certain other situations to our continued processing of your personal information
- Otherwise restricting our processing of your personal information in certain circumstances
- Claiming compensation for damages caused by our breach of any data protection laws

For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner’s Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

If you would like to exercise any of those rights, please:

- Email, call or write to our Data Protection Officer
- Let us have enough information to identify you, *e.g. account number, user name, registration details*
- Let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill), and
- let us know the information to which your request relates

## How to complain

We hope that our Data Protection Officer can resolve any query or concern you raise about our use of your information.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone:0303 123 1113.

## Changes to this privacy notice

We may change this privacy notice from time to time When we do we will inform you via [*insert mechanism for informing the data subject of changes to the notice*].

## How to contact us

Please contact our Data Protection Officer if you have any questions about this privacy notice or the information we hold about you.

If you wish to contact our Data Protection Officer, please send an email to [antonia.noble@icloud.com](mailto:antonia.noble@icloud.com) or [antonia@carter-noble.co.uk](mailto:antonia@carter-noble.co.uk), or write to [Insert name of School].