



SUMMERHILL INFANT SCHOOL



Inspiring, nurturing and supporting each child, every day to develop citizens for the future. Our School lays the foundation for a lifetime love of learning

PRIVACY NOTICE

Document Summary

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Version	Amendment Date	Pg Num	Amendment Summary
1.0	16.10.2023	Appendix A	Inclusion of CCTV Privacy Notice
2.0	05.12.2023		Compliance check by BCC DPO

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 school 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 **you/your child**.

Please see appendix A – CCTV Privacy Notice

We, Summerhill Infant School, are the 'data controller' for the purposes of data protection law.



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Our Data Protection Administrator is Mrs Dyer, Senior Administrator (see 'Contact us' below).

The personal data we hold

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

- Contact details and contact preferences
- Financial information
- Photographs
- Videos (inc. taken from CCTV)
- Pupil Education Records

Summerhill Infant School uses Google Classroom as an online platform to share photos/videos of students learning during the academic day. These photos/videos are not to be shared parents/carers via wider social network platforms.

We may also collect, store and use information about you/your child that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Characteristics, such as ethnicity, languages spoken and eligibility for certain benefits
- Family circumstances
- Physical and mental health, including medical conditions
- Support received, including care packages, plans and support providers

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:

- Safeguard and improve Health & Safety for all students, staff and visitors
- Report to you on your child's attainment and progress
- Provide updates on events your child is a part of



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- Keep you informed about the running of the school (such as emergency closures) and events
- Process applications for Free School Meal/Pupil Premium entitlement
- Provide appropriate pastoral care
- Protect pupil welfare
- Administer admissions waiting lists
- Assess the quality of our services
- Carry out research
- Comply with our legal and statutory obligations

Use of your personal data for marketing purposes

Where you have given us consent to do so, Summerhill Infant School 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 clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting our Data Protection Administrator.

Our legal basis for using this data

We only collect and use your personal data when the law allows us to. Most commonly, we process it where:

- Safeguard all students, staff and visitors
- We need to comply with a legal obligation
- We need to perform an official task in the public interest
- We need to fulfil a contract we have entered into with you

Less commonly, we may also process your personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect an individual's vital interests (protect their life)
- We have legitimate interests in processing the data – for example, where:



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Where you have provided us with consent to use your 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.

Some of the reasons listed above for collecting and using your personal data overlap, and there may be several grounds which justify our use of your data.

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 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.

How we store this data

We keep personal information about you & your child 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 Data Retention and Erasure Policy sets out how long we keep information about parents and carers.

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:

- Our 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
- Our regulator
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Our auditors



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- 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

Your data rights

How to access personal information that we hold about you

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- 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 Administrator.

Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:



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- Object to the use of your personal data if it would cause, or is causing, damage or distress
- 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
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our Data Protection Administrator.

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 Administrator.

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

- 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 Administrator**: summerhill.i@bristol-schools.uk



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Appendix A – CCTV Privacy Notice

How we use CCTV data;

No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities (unless clearly signed).

CCTV Camera locations/positions;

- Main School Office Foyer
- Main front gate
- Reception Playground
- Year 1 Playground

Summerhill Infant School are a data controller for the purpose of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA). General Data Protection Regulation.

The school will only use surveillance cameras for the safety and security of the school and its staff, pupils and visitors. Surveillance will be used as a deterrent for violent behaviour and damage to the school.

We collect your information to;

- Maintain a safe environment
- Ensure the welfare of pupils, staff and visitors
- Deter criminal acts against persons and property
- Assist the police in identifying persons who have committed an offence
- The prevention, investigation and detection of crime
- Monitoring the security of the site
- The apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings).

The categories of visitor data we collect include;

- Personal/special categories of information such as ;
 - Images and video footage of students, staff, parents and visitors



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The lawful basis on which we use this information;

The lawful basis for processing is contained in the schools Privacy Notice. The lawful basis includes the following;

- Article 6 (Public Task) and Article 9 (Substantial Public Interest) - Data Protection Act, Schedule 1, Part 2, 6 - Statutory and Government purposes, Data Protection Act, Schedule 1, Part 2, 10 – Preventing and detecting unlawful acts
- The Management of Health & Safety at Work 1999 Act;
 - The Common Law Duty of Care
- The Health & Safety at Work Act 1974
 - Health & Safety at Work Act
- The Education Act 2022 (Section 175)
 - Safeguarding Vulnerable Groups Act
 - Working together to Safeguard Children Guidelines (DfE)

Public Task;

We process CCTV data in order to comply with our public task, namely to ensure that the security of our students, staff, building and their contents are maintained at all times.

The following information is processed as a result of the schools public task;

- Images and video footage of students, staff, parents and visitors

Identification;

In areas where CCTV is used the school will ensure that there are prominent signs in place.

The signs will;

- Be clearly visible and readable
- Be an appropriate size depending on context

Storing digital images;

Images captured by CCTV/Surveillance will not be kept for longer than 30 days. However, on occasions there may be a need to keep images for longer, for example where a crime is being investigated. Data is encrypted and stored securely prior to destruction.



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Neither the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA). Nor the Information and Records Management Society prescribe any specific minimum or maximum periods which apply to CCTV recorded images. The school ensures that the images are not retained for longer than is necessary. Once the retention period has expired, the images are permanently deleted.

Recorded images will be stored in a way that ensures the integrity of the image and in a way that allows specific times and dates to be identified. Access to live images is restricted to the CCTV operator and limited members of staff where the system is located.

Recorded images can only be viewed in a restricted area by approved staff. The recorded images are viewed only when there is suspected criminal activity/when a complaint against a member of staff has been escalated to the Headmaster and not for routine monitoring of pupils, staff or visitors.

The school reserves the right to use images captured on CCTV where there is activity that the school cannot be expected to ignore such as criminal activity, potential gross misconduct, or behaviour which puts others at risk.

Images retained for evidential purposes will be retained in a locked area accessible by the system administrator only. Where images are retained, the system administrator will ensure the reason for its retention is recorded, where it is kept, any use made of the images and finally when it is destroyed.

Who we share visitor data with;

We do not routinely share this information with any external organisations or third parties.

There may be circumstances in which we may lawfully share CCTV images with third parties where, for example, we are required to do so by law, by court order, or to prevent fraud or other crimes. Where we share data, however, we shall do so in accordance with applicable data protection law.

We will not give information about you to anyone outside this establishment without your consent unless the law permits it.