

Greenwich House Independent School, Kindergarten and Creche (“Greenwich House”)

Privacy Notice

**Greenwich House Independent School, Kindergarten and Creche
106 High Holme Road
Louth
Lincolnshire
LN11 0HE**

Data Protection Officer: Mrs J M Brindle

Introduction

We are committed to ensuring that any personal data we hold about you and your child is protected in accordance with data protection laws and is used in line with your expectations.

This privacy notice explains what personal data we collect, why we collect it, how we use it and how we protect it.

What is pupil information?

In this Privacy Notice “personal data” means the personal data of a pupil. By necessity, this will include the personal information of parents, carers and guardians. It may include the personal information of prospective and past pupils and parents, and, persons authorised by parents to be contacted in an emergency.

We also briefly refer to visitors and in this context “personal data” would not include your child’s personal data unless the visitor is attending pursuant to the interests of their child eg. a parent or carer attending with their child or providing personal data relating to their child when visiting Greenwich House pursuant to making an enquiry about the availability of a place.

What personal data do we collect?

We collect personal data about you and your child to provide care and learning that is tailored to meet your child’s individual needs. We also collect information in order to verify your eligibility for free childcare as applicable.

Personal details that we collect about your child include:

- your child’s name, date of birth, address, health and medical needs, development needs, any special educational needs, characteristics (such as ethnicity, language, nationality, country of birth and pupil premium eligibility), visual images; attendance information (such as sessions attended, number of absences and absence reasons), assessment information including copy reports, and exclusions/behavioural information

Where applicable we will obtain child protection plans from social care and health care plans from health professionals.

We will also ask for information about who has parental responsibility for your child and any court orders pertaining to your child.

Personal details that we collect about you include:

- your name, home and work address, phone numbers, emergency contact details, and family details, financial details provided by parents and/or guardians for the purpose of receiving or making payments for the education Greenwich House provides.

This information will be collected from you directly in the registration form.

If you apply for up to 30 hours free childcare, we will also collect:

- your national insurance number or unique taxpayer reference (UTR), if you're self-employed. We may also collect information regarding benefits and family credits that you are in receipt of.

Some of the information we collect is categorised as a special category of data eg. race, ethnic origin religious beliefs and health. Data relating to criminal offences is also afforded similar special protection.

Some of the personal information described above (including name and contact details and the name and date of birth of a child) may be collected for the purposes of dealing with an enquiry on behalf of a child in respect of a place at Greenwich House. It may also be collected from visitors for health and safety reasons.

Why we collect this information and the legal basis for handling your data

We use personal data about you and your child in order to provide childcare / education services and fulfil the contractual arrangement you have entered into. This includes using your data to:

- deal with enquiries for a place for a child at Greenwich House and to undertake our admissions process
- contact you in case of an emergency
- to support your child's education, wellbeing and development
- to manage any special educational, health or medical needs of your child (including the protection of his or her vital interests ie. to protect them from severe harm, injury or death) whilst at our setting
- to carry out regular assessment of your child's progress and to identify any areas of concern
- to maintain contact with you about your child's progress and respond to any questions you may have
- to process your claim for up to 30 hours free childcare (only where applicable) or for other funding as from time to time may be available
- to keep you updated with information about our service including events
- to record, raise and obtain payment of invoices, or in relation to other payments eg. Trips
- to organise and deliver extra curricular activities and off premises visits
- to administer access to the school

With your consent, we will also record your child's activities for their individual learning record in the Early Years Foundation Stage and as part of the curriculum and activities of the School. This may include photographs and videos. You will have the opportunity to

withdraw your consent at any time, for images taken by confirming so in writing. We may seek to obtain your consent for the collection, processing or sharing of other personal data from time to time and for specific purposes. In such cases you will be able to withdraw your consent but, until it is withdrawn, the processing and sharing of data with consent is valid.

We have a legal obligation to process safeguarding related data about your child should we have concerns about their welfare. In addition we have a legal obligation for children of compulsory school age to share information concerning the admission to and removal of pupils from our admissions register with the local authority. We also have a legal obligation to transfer certain records and information about your child to the school that your child will be attending / next attending. In addition we have a legal obligation to provide information to other agencies.

Greenwich House has a legitimate interest in the collection and handling of personal data for making or defending legal claim in the interests of its business and to comply with its health and safety responsibilities, for example, keeping a log of visitors. In addition, Greenwich House has a legitimate interest to maintain its admission register to answer queries about dates of attendance from previous pupils. This includes information required by law to be recorded at the time of a pupils admission, any amendments required during their time at Greenwich House and details of their leaving. It includes names, dates of birth, dates of admission, addresses and details of parents and carers and details of the next educational setting.

Greenwich House collects and uses special categories of information for the following legal reasons:-

- To protect somebody's vital interests where they are physically or legally incapable of giving consent.
- To make or defend legal claims or in similar circumstances

Who we share your data with

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

In order for us to deliver childcare / education services we will also share your data as required with the following categories of recipients:

- The Department for Education including Ofsted - during an inspection, following a complaint about our services, or if we are required to notify them of an incident - and the Standards and Testing Agency – for Key Stage 2 SATs
- banking services to process direct debit payments (as applicable)
- the Local Authority (eg. including where you claim up to 30 hours free childcare as applicable; for the purposes of child protection (eg. as described in “Working Together to Safeguard Children”) and/or to share information about our pupils attendance, admission and removal from the admissions register with our local authority under Education (Pupil Registration) (England) Regulations 2006 as amended. Our other legal duties include those described in the Statutory Framework for the Early Years Foundation Stage and for SEND.
- the government's eligibility checker (as above)
- our insurance underwriter (if applicable)
- professional advisers including our accountant and legal advisers to obtain advice and have action taken eg. to pursue or defend claims relating to the business of Greenwich

House, or, obtain advice about the running of the business in accordance with its legal duties

- our setting software management provider (if applicable)
- the school that your child attends after leaving us

We will also share your data if:

- we are legally required to do so, for example, by law or by a court;
- to enforce or apply the terms and conditions of your contract with us;
- to protect your child and other children; for example by sharing information with social care or the police or a statutory health organisation;
- it is necessary to protect our or others (including the Head Teacher and other staff members) rights, property or safety
- we transfer the management of the setting, in which case we may disclose your personal data to the prospective buyer so they may continue the service in the same way
- we have consent for the purposes of publication in the media and for school photographs

We will never share your data with any other organisation to use for their own purposes

We are required by law, to provide information about our pupils to the Department for Education as part of statutory data collections for the Key Stage 2 tests (which Greenwich House provides pupils with the opportunity to take part in) and for the Early Years Census. Some of this information is then stored in the National Pupil Database (NPD). The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies. The procedures concerning the Key Stage 2 tests are set out at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/651763/2018_KS2_Assessment_and_Reporting_Arrangements_ARA.pdf. To find out more about the pupil information we share with the department, for the purpose of the early years census, go to https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/678214/Early_Years_Census_guide_2018_version_1_4.pdf. The law requiring Greenwich House to complete the early years' census is through regulations under Section 99 of the Childcare Act 2006 and The Education (Provision of Information About Young Children) (England) Regulations 2009.

To find out more about the pupil information we share with the department, for the purpose of data collections, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

The Department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether the Department for Education releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided pupil information, (and for which project), please visit the following website: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

To contact DfE: <https://www.gov.uk/contact-dfe>

The law requiring Greenwich House to share information in the Early Years Foundation Stage Profile with the local authority is through Childcare (Provision of Information about Young Children (England) Regulations 2009 and The Early Years Foundation Stage (Learning and Development Requirements) Order 2007 and set out in the Statutory Framework for the early years foundation stage.

If you need more information about how our local authority collects and uses your information, please visit our local authority at <https://www.lincolnshire.gov.uk/local-democracy/information-governance/data-protection/>

For the avoidance of doubt, the data protection requirements do not prevent or limit Greenwich House from the essential sharing of information for the purposes of keeping children safe. Subject to appropriate safeguards being in place, information may be shared with other schools, Children's Services and other local agencies for this purpose. Consent is not required to share this information if the obtaining of consent places a child at risk.

How do we protect your data?

We protect unauthorised access to your personal data and prevent it from being lost, accidentally destroyed, misused, or disclosed by:-

- checking the quality and the accuracy of the information we hold
- ensuring that information is not retained for longer than is necessary
- ensuring that when obsolete information is destroyed that it is done so appropriately and securely
- ensuring that clear and robust safeguards are in place to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded
- sharing information with others only when it is legally appropriate to do so
- ensuring our staff are aware of and understand our policies and procedures

How long do we retain your data?

In our Kindergarten and Creche we retain your child's personal data for up to 3 years after your child no longer uses our setting, or until our next Ofsted inspection after your child leaves our setting. Medication records and accident records are kept for longer according to legal requirements. Your child's learning and development records are maintained by us and handed to you when your child leaves. In some instances (child protection, or other support service referrals) we are obliged to keep your data for longer if it is necessary to comply with legal requirements.

In our School we retain your child's personal data (including accident records) for up to 25 years from their date of birth. In some instances (child protection, or other support service referrals) we may be obliged to keep your data for longer if it is necessary to comply with legal requirements. We maintain our admissions register to deal with enquiries from past pupils concerning their dates of attendance. We refer to guidance contained in the IRMS Information Management Toolkit for Schools, Version 5, February 2016 in respect of the retention of personal data.

With consent we may retain the names and contact details of parents and pupils of Greenwich House who have left the setting for the purpose of informing them of events involving Greenwich House's alumni.

We will retain information collected from persons making enquiries for a place for a child at Greenwich House for no longer than two years.

We will retain information collected from visitors in our visitors book for the remainder of the current school year plus 6 years from the date of entry in accordance with the IRMS Information Management Toolkit for Schools, Version 5, February 2016

Automated decision-making

We do not make any decisions about your child based solely on automated decision-making.

Transfers

It may sometimes be necessary to transfer personal information overseas. When this is needed information is generally shared within the European Economic Area (EEA). Any transfers made will be in full compliance with all aspects of the requirements of data protection compliance.

Your rights with respect to your data

You have the right to:

- request access, amend or correct your/your child's personal data
- request that we delete or stop processing your/your child's personal data, for example where the data is no longer necessary for the purposes of processing; and
- request that we transfer your, and your child's personal data to another person

If you wish to exercise any of these rights at any time or if you have any questions, comments or concerns about this privacy notice, or how we handle your data please contact us. If you continue to have concerns about the way your data is handled and remain dissatisfied after raising your concern with us, you have the right to complain to the

Information Commissioner Office (ICO). The ICO can be contacted at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or ico.org.uk/

Changes to this notice

We keep this notice under regular review. You will be notified of any changes where appropriate.