

Privacy Notice – Covid 19 School Hub Arrangements

This privacy notice is intended to provide information about how we will use (or “process”) personal data about individuals including: its staff; its current, past and prospective children; and their parents, carers or guardians (referred to in this policy as “parents”). This privacy notice is required as personal data about children, parents and carers will be used to manage the arrangements for the Hub service.

The arrangements of the Hub scheme will be temporary. However more information about how we manage personal data and our other policies are available on the website - <https://www.chilwellschool.co.uk/page/?title=Data+Protection+and+Privacy&pid=96> as we will be based at Chilwell School more detail about their Data Protection and other applicable policies can be found at <https://www.chilwellschool.co.uk/page/?title=Policies+and+Documents&pid=27>

Whose Data does this Notice apply to?

This Privacy Notice is applicable to all pupils, parents, carers, staff and volunteers who are not employed by or on roll Chilwell School.

This is a temporary notice.

Why is it needed?

This information is provided because Data Protection Law (General Data Protection Regulations May 2018) gives individuals rights to understand how their data is used. Pupils, parents, carers, staff and volunteers are all encouraged to read this Privacy Notice and understand our obligations to our entire community.

This Privacy Notice also applies in addition to our other relevant terms and conditions and policies, including:

- Any contract between Chilwell School and its staff or the parents of children
- Any contract between staff from other settings and temporarily based at Chilwell School and their own employer
- Chilwell School Data Protection Policy
- Chilwell School policy on taking, storing and using images of children
- Chilwell School data retention policy
- Chilwell School safeguarding and health and safety policies, including as to how concerns or incidents are recorded (and any updates that are required by the Covis19 DfE guidance even if these have not yet been approved by Governors)
- Chilwell School managing children with medical needs policy and procedures

Anyone who works for, or acts on behalf of, the participating schools (including staff, volunteers, governors and service providers) should also be aware of and comply with this Privacy Notice, which also provides further information about how personal data about those individuals will be used.

Data Collection protection

The data collected and processed, directly and from our partner schools, may include:

- Personal information (such as name, date of birth and address)
- Personnel files
- Characteristics (such as nationality and language)

- Attendance information (such as daily registers)
- Relevant medical information
- Special educational needs information
- Health information

Why we collect and use this information

- To fulfil our duties and obligations under a contract with our staff and parents of children
- To ensure that children's needs are appropriately met
- To provide appropriate pastoral care and comply with our legal obligations
- To assess the quality of our services
- To comply with our legal obligations to safeguard and protect children
- To comply with the law regarding data sharing

In addition, Chilwell School and other partners will on occasion need to process special category personal data (concerning health, ethnicity, religion) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons will include:

- To safeguard children's welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to staff who need to be made aware of dietary or medical needs;
- In connection with employment and management of Chilwell School staff and other school employees, for example DBS checks, welfare or pension plans
- As part of our complaints, disciplinary or investigation process that involves such data, for example if there are SEN, health or safeguarding elements; or
- For legal and regulatory purposes (for example child protection and health and safety) and to comply with our legal obligations and duties of care

How we collect data

Generally, we receive personal data from the individual directly (including, in the case of children and young people, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as e mail or text).

However, in some cases personal data will be supplied by third parties (for example another childcare setting, school or other professionals or authorities working with that individual).

Storing data

We hold data for as long as the Hub arrangements remain in place, and subject to our data retention policy. Some data for HMRC purposes, personnel records and incidents and attendance will need to be kept for a period of years, likely 3-5. However, the expectation is that data will be returned to the pupil's own school when this process is concluded. The HUB School will not retain any data longer than is necessary.

Who we may share information with:

- Schools that our children attend

- The Local Authority
- The Department for Education
- Welfare and Housing Agencies
- Professional advisers (e.g lawyers and accountants)

From time to time, we may also share information with other third parties for example:

- The Police and law enforcement agencies
- Courts, if ordered to do so
- Social care and other external agencies

Why we may share information

We will not share information about the children and young people who attend with anyone without consent unless the law and our policies allow us to do so. For the most part, personal data collected by Chilwell School will remain within Chilwell School, and will be processed by appropriate individuals only in accordance with access protocols.

However, a certain amount of any SEN and medically relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the child may require.

Pupils, parents, carers, staff and volunteers are reminded that Chilwell School is under duties imposed by law and statutory guidance to record or report incidents and concerns that arise or are reported to us, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO or police.

We are obliged to ensure that anyone working with children is subject to the Keeping Children Safe in Education 2019 requirements. This can include sharing concerns or reports with the police, Disclosure and Barring Service or Teaching Regulation Authority.

Finally, in accordance with Data Protection Law, some of Chilwell School processing activity is carried out on its behalf by third parties, such as information management systems, web applications or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions.

Your rights

Individuals have various rights under Data Protection Law to access and understand personal data about them held by Chilwell School, and in some cases ask for it to be erased or amended or have it transferred to others, or for us to stop processing it – but subject to certain exemptions and limitations.

Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to the Chilwell School.

We will endeavour to respond to any such written requests as soon as is reasonable practicable and in any event within statutory time limits (which is one month in the case of requests for access to information).

Data accuracy and security

We will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must please notify in writing Mrs S Williams of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law).

We will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around the used of technology and devices and access to systems. All staff will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

Complaints

We are registered with the Information Commissioner's Office (ICO). If an individual believes that we have not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise our complaints/grievance procedure and should also notify the Director whose details are stated in this Privacy Notice. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO), although they recommend that steps are taken to resolve the matter before involving the regulator.