



WRAY COMMON PRIMARY SCHOOL

PRIVACY NOTICE FOR PARENTS/CARERS

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 parents and carers of pupils.

Greensand Multi Academy Trust, Pendleton Road, Reigate RH2 7NT is the 'data controller' for the purposes of Data Protection Law.

The Data Protection Lead at Wray Common School is Lisa Huddleston (and the Data Protection Officer for the Trust (DPO) is Wendy Hill (see 'contact us' below).

The personal data we hold

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

- Contact details, contact preferences (such as your name, address, email address and telephone numbers)
- Bank details – for processing payments for trips, services or refunds
- Details of your family circumstances
- Details of any safeguarding information including court orders or professional involvement
- Records of your correspondence and contact with us
- Details of any complaints you may have made
- Information about any health conditions you have that we need to be aware of
- Photographs and CCTV images captured in school

We may also hold information about you that we have received from other organisations, including other schools, social services, the police or other external bodies.

Why we use this data

We collect and use this information for the following purposes:

- Report to you on your child's attainment and progress
- Keep you informed about the running of the school (such as emergency closures) and events
- Process payments for academy services and clubs
- Provide appropriate pastoral care
- Protect pupil welfare
- Assess the quality of our services

- Administer admissions waiting lists
- Carry out research – this refers to internal school improvement or Trust wide research. We do not share your data externally for commercial research.
- Comply with our legal and statutory obligations
- Make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely.

Our lawful basis for using this data

Under the UK General Data Protection Regulation (UK GDPR), the lawful basis we rely on for processing parents' and carers' data are:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest
- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests).

In addition, concerning special category data, we rely on the following bases for processing parents' and carers' information:

- We have your explicit consent
- When required for reasons of substantial public interest
- When required to ensure health and safety on the school site.

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 personal data overlap, and there may be several grounds which justify our use of this data.

We do not rely on the lawful basis of legitimate interests when processing parental data.

Our basis for using special category data

For 'special category' data (more sensitive personal information), 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 got your explicit consent to use your information in a certain way
- We need to use your information under employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you are physically or legally incapable of giving consent
- The information has already been made obviously public by you
- We need to use it to make or defend against legal claims
- We need to use it for reasons of substantial public interest as defined in legislation
- We need to use it for health or social care purposes, and it is used by, or under the direction of, a professional obliged to confidentiality under law
- We need to use it for public health reasons, and it is used by, or under the direction of, a professional obliged to confidentiality under law
- We need to use it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the use 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 got your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you are physically or legally incapable of giving consent
- The data concerned has already been made obviously public by you
- We need to use it as part of legal proceedings, to obtain legal advice, or to make or defend against legal claims
- We need to use it for reasons of substantial public interest as defined in legislation.

Use of your 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 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 us (see 'contact us' below).

Use of your personal data in automated decision-making and profiling

We do not currently process any parents' or carers' personal data through automated decisionmaking or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

Collecting this data

We collect information about parents and carers via a range of sources - including, but not limited to, Common Transfer Files from a previous school, registration forms, data collection forms completed by parents/carers and other sources.

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.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local Authorities and other schools
- Government departments or agencies
- Your children
- Policy forces, courts or tribunals.

How we store this data

Most parental data is kept for the duration of your child's enrolment unless required longer by law or safeguarding.

The Greensand Data Retention and Destruction Policy is available on the Greensand website.

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

We will dispose of your personal data securely when we no longer need it.

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 UK data protection law) we may share personal information with:

- The Trust – Greensand Multi Academy Trust
- Our Local Authority – Surrey County Council to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
- The Department of Education – to meet legal obligation
- Our regulator e.g. Ofsted – may access information during an inspection
- Financial organisations – to allow payments to be taken and received (e.g. Tucasi)
- Our auditors
- Health and social welfare authorities – to meet our legal obligations to share certain information with it, such as health and wellbeing/safeguarding concerns.

Transferring data internationally

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, you can get a copy of these arrangements by contacting us.

Some third-party systems may store data outside the UK. Appropriate safeguards such as adequacy decisions or IDTAs are applied.

Your rights

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 you.

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.

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 us (see 'Contact us' below).

Your other rights regarding your data

- Under 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 personal data
- Prevent your data being used to send direct marketing
- Object to and challenge 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

- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your 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).

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.

Contact us

If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact our **data protection lead or the Greensand Trust DPO**:

Lisa Huddleston – lhuddleston@wray-common.surrey.sch.uk - 01737 761254

Wendy Hill: w.hill@greensandacademytrust.co.uk – (01737 948187)

Updated 13.03.26 - Lisa Huddleston