

Privacy Notice for Children and Parents/Carers

Note to parents / carers: This privacy notice explains how we collect, store and use your personal data and your child's personal data. Where there is a difference in what and how we process your data and your child's data, we will look to indicate this below.

WHO PROCESSES INFORMATION?

Ark Start is a programme of Ark UK Programmes. Ark UK Programmes is the organisation which is in charge of your personal information. This means that Ark UK Programmes is called the 'Data Controller'. The postal address for Ark UK Programme is The Yellow Building, 1 Nicholas Road, London, W11 4AN.

If you want to contact us about your personal information or your child's personal information you can contact our school data protection lead, who is **ZOIE SCRIVEN**. You can speak to her in school or you can leave a letter at reception or send one by post or email by emailing Zoie.Scriven@ArkStart.org.uk. You can also email Ark UK Programmes' Data Protection Officer using the email address data.protection@arkonline.org.

The personal data we process may be shared with third parties, where it is necessary for us to do so and we have a lawful basis to do so.

WHY DO WE NEED INFORMATION?

We have the legal requirement, a contractual obligation and a legitimate interest to collect and process your personal data, including those in relation to the following:

- Report to parents / carers on their child's attainment and progress;
- Support children's learning and provide appropriate care;
- Keep parents / carer's informed about the running of the school (such as emergency closures) and events;
- Process payments for school services and clubs;
- Provide appropriate pastoral care;
- Protect children's welfare;
- Administer admissions waiting lists;
- Assess the quality of our services;
- Carry out research;
- To keep children safe (food allergies, or emergency contact details);
- Comply with the statutory duties placed on us by Department for Education (DfE) data collections.

We have a good reason for having this information which means it is lawful and so we do not usually need consent to use this information. Sometimes we may want to use data differently and in these cases we may need to gain consent from a parent / carer. Where we ask for consent, parents / carers can change their mind at any time.

INFORMATION THAT WE COLLECT, PROCESS, HOLD AND SHARE

This includes the following information about children:

- Personal identifiers and contacts (such as name, unique pupil number and reference numbers, contact details and address);
- Characteristics (such as ethnicity, language, and free school meal eligibility);
- Safeguarding information (such as court orders and professional involvement);
- Special educational needs (including the needs and ranking);
- Medical and administration (such as doctors' information, child health, dental health, allergies, medication, vaccination and dietary requirements);
- Attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended);
- Tests and results;
- Information about behaviour (such as exclusions and any relevant alternative provision put in place);
- Information about free school meal and pupil premium eligibility;
- Information we use to arrange school meals (e.g. whether a child has school dinners and how often);
- CCTV images captured in school;
- Add any others relevant e.g. any other form of identity management or authentication, anything related to school trips;
- We will also use photographs of children but only when it is appropriate to do so.

This includes the following information about parents / carers:

- Contact details and contact preferences;
- Bank details;
- Photographs;
- CCTV images captured in school;
- 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 parents / carers that we have received from other organisations, including other schools and social services.

THE LAWFUL BASIS ON WHICH WE PROCESS THIS INFORMATION

- Article 6 1(a) of the GDPR which allows processing with your consent;
- Article 6 1(b) of the GDPR which allows processing that is necessary for the performance of a contract;
- Article 6 1(c) of the GDPR which allows processing that is necessary to comply with a legal obligation;
- Article 6 1(d) of the GDPR which allows processing that is necessary to protect vital interests;
- Article 6 1(e) of the GDPR which allows processing that is necessary in order for the nursery school to function;
- Article 6 1(f) of the GDPR which allows processing that is in our legitimate interests;
- Article 9 2(b) of the GDPR which allows the processing of special category data that is necessary for carrying out obligations in the fields of employment and social security and social protection law;
- Article 9 2(g) of the GDPR which allows the processing of special category data that is necessary for reasons of substantial public interest;

- Article 9 2(j) of the GDPR which allows the processing of special category data when it is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

The processing of personal data and the identification of a relevant lawful basis of processing is subject to an ongoing review and is consistently being reviewed as part of our efforts to adhere to the principles of data protection.

STORING DATA

Personal data is processed using a combination of cloud-based information management systems, cloud storage and sharing facilities, on local file servers and in paper copies. In accordance with data protection legislation it is only retained for as long as is necessary to fulfil the purposes for which it was obtained, and not kept indefinitely.

We have a policy which explains how long we keep information relating to partner schools that we work with. It is called a Data Retention Schedule and details can be found in the table below:

Ark Start Data Retention Schedule	
Document category and basic description	Ark Start Retention Period
Pupil and parent data:	
Held in Blossom – inclusive of identifiers, contact information, attendance information, health information, etc.	Retained for seven years.
Held in EExAT – inclusive of identifiers and assessment information.	Retained for seven years.
Held in Impero EdAware – Safeguarding records.	Retained for seven years.
Held on SharePoint – inclusive of application and other records, event attendance information, pupil performance records, etc.	Retained for seven years.
Non-pupil and parent data:	
Contacts (such as suppliers) – inclusive of identifiers and contact details, etc.	Kept until no longer needed or up to date.

The following document categories are covered under Ark Schools Data Retention Schedule and you can request a copy of this schedule by emailing dataprotection@arkonline.org: Corporate / constitutional, insurance, health and safety, pension records, employees and administration.

TRANSFER OUTSIDE OF THE EUROPEAN ECONOMIC AREA (EEA)

We do not normally transfer your information to a different country outside the EEA. However, some of our external third-party support partners are based outside the EEA so their processing of personal data will involve a transfer of data outside the EEA. Whenever we transfer personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented, including:

- We will only transfer personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission;
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe and Standard Contractual Clauses.

WHO WE SHARE DATA WITH?

We do not share information about children or parents / carers with anyone without permission unless the law says we can or should. We share information we process about children with the following:

Government

We are required, by law (under regulation 5 of the Education (Information about Individual Pupils) (England) Regulations 2013), to pass some information about children to the DfE. This is the part of the Government which is responsible for schools. This personal information may, in turn, then be made available for use by the Local Authority. The DfE may also share this information that we give to them with other people or organisations. This will only take place where the law, including the law about data protection, allows it.

Parents and carers

We will also normally give information about children to parents or the main carer. We will also take family circumstances into account, in particular where a Court has decided what information a parent / carer is allowed to have.

External organisations

We may also share personal data with:

- Ark Schools and the new primary school and any other nursery school;
- Disclosures connected with special educational needs support;
- School nurse / counsellor and CAMHS (Child and Adolescent Mental Health Service);
- Educators, examining bodies and our regulator Ofsted;
- Suppliers and service providers – to enable them to provide the service we receive from them;
- Central and local government;
- Survey, research and security organisations;
- Health authorities, health and social welfare organisations;
- Financial organisations, professional advisers and consultants including our auditors;
- Charities, voluntary organisations and professional bodies;
- Police forces, courts, tribunals.

We share parent / carer information with the following:

- 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, Ofsted;
- Suppliers and service providers – to enable them to provide the service we have contracted them for;
- Financial organisations;
- Our auditors;
- Survey and research organisations;
- Health authorities such as the NHS;
- Security organisations;

- Health and social welfare organisations;
- Professional advisers and consultants;
- Charities and voluntary organisations.

WHAT ARE YOUR RIGHTS?

Parents / carers have the right to do the following with regards to their own data and their child's data on their behalf:

- Ask us for a copy of the information we have about you or your child. This is called a 'subject access request';
- Ask us to correct any information we have about if you think it is wrong;
- Ask us to erase information about you or your child (although we may have good reasons why we cannot do this);
- Ask us to limit what we are doing with your information or your child's information;
- Object to what we are doing with your information or your child's information;
- Ask us to transfer your information or your child's information to another organisation in a format that makes it easy for them to use.

Ark Start and Ark UK Programmes aims to comply fully with its obligations under the GDPR. If you have any questions or concerns regarding Ark management of personal data including your child's data subject rights or your data subject rights, please contact the Data Protection Officer (dataprotection@arkonline.org) who is responsible for ensuring Ark UK Programmes is compliant with the GDPR. If Ark holds inaccurate information about a child or a parent / carer, Data Protection Officer (dataprotection@arkonline.org) explaining what the problem is and where appropriate provide with any evidence to show what the information should say. Keep copies of the correspondence. If after a reasonable amount of time (28 days is recommended) the information has not been corrected, a complaint can be made. If you feel that your questions / concerns have not been dealt with adequately on any data protection matter, please get in touch with us and the matter will be escalated to our Head of Governance. If you remain unhappy with our response or if you need any advice you can contact the Information Commissioner's Office (ICO). Please visit their website (www.ico.org.uk/concerns) for information on how to make a data protection complaint.