



# Horningsham Primary School

Church Street, Horningsham, Warminster, Wiltshire, BA12 7LW

Tel: 01985 844342 Email: [admin@horningsham.wilts.sch.uk](mailto:admin@horningsham.wilts.sch.uk)

Headteacher: Mrs Odele Lapham

## Parents and Carers Privacy Notice

### Introduction

Horningsham Primary School [The School Name] ("we", "our", "us") is a maintained primary school and the **data controller** for the personal data we collect about you. This Privacy Notice explains how we collect, use, share, and protect your personal data in accordance with the **UK GDPR**, the **Data Protection Act 2018**, and the **Data (Use and Access) Act 2025 (DUAA)**.

If you have any questions about how we handle your personal data, please contact our School Office:

- Email: [admin@horningsham.wilts.sch.uk](mailto:admin@horningsham.wilts.sch.uk)
- Phone: **01985 844342**

### The Personal Data We Collect About You

We collect and process the following categories of data about parents and carers:

- Basic personal details: full name, title, address, phone numbers, email, workplace contact details
- Relationship to the pupil: including parental responsibility status
- Emergency contact information
- Court orders and legal documents (e.g., parental responsibility documentation, Section 8 orders, prohibited steps orders, child arrangement orders)
- Medical or accessibility needs affecting interactions with the school
- Communication preferences
- Free School Meals (FSM) eligibility information
- Financial data: payments for meals, trips, clubs, or other charges (via ParentPay or equivalent)
- Volunteer information, including DBS checks where applicable
- Safeguarding disclosures where necessary and appropriate
- Support service referrals (e.g., Early Help, Family Support)
- Consents: photography, trip participation, use of online platforms
- Correspondence between school and parent/carer (e.g., complaints, concerns, enquiries)

### Why We Collect and Use This Data

We process your data to:

- Contact you regarding your child's education, wellbeing, or in an emergency
- Manage day-to-day school communication and updates
- Assess and administer eligibility for Free School Meals or Pupil Premium
- Ensure the **safety, safeguarding, and welfare of pupils**
- Comply with family court orders or other legal obligations
- Record and process payments or financial transactions
- Provide access to systems and services (e.g., ParentMail, online learning platforms)
- Enable parental involvement in school activities and volunteering
- Ensure accessibility and respond to reasonable adjustments
- Comply with statutory duties from the Department for Education or Local Authority

## Lawful Bases for Processing

For most processing, we rely on:

- **Public Task:** Processing necessary to carry out our statutory duties (e.g., education, safeguarding, reporting, admissions).
- **Legal Obligation:** To comply with laws relating to education, safeguarding, equality, and financial obligations.
- **Vital Interests:** To protect the health or safety of a child or individual in an emergency.
- **Consent:** Where permission is required (e.g., photography, certain communications).

### Recognised Legitimate Interests (RLI) under DUAA 2025:

We may rely on RLI for **non-statutory activities** that support safeguarding or public-interest purposes, particularly when collaborating with external organisations.

#### Examples:

- Sharing information with mental health charities or external counsellors supporting a pupil
- Participation in multi-agency early help programmes or pilot projects
- Allowing external safeguarding auditors or evaluators access to anonymised or limited data

**Note:** RLI does not replace Public Task. It is only used for activities outside statutory duties.

Special **Category Data** (e.g., health, court orders) is processed under:

- **Explicit Consent** (where applicable)
- **Legal obligations or judicial acts** (e.g., safeguarding, court orders)
- **Substantial Public Interest** (e.g., safeguarding, child protection)

## Who We Share Your Information With

Data is shared only when necessary, proportionate, and lawful:

- Local Authority (e.g., Wiltshire Council) for safeguarding, admissions, and support services
- Department for Education (DfE) and its systems (e.g., National Pupil Database)
- NHS and Public Health England (e.g., vaccinations, outbreaks, medical incidents)
- Educational platforms (ParentMail, Wonde, Microsoft 365, learning apps)
- School meal and payment providers (ParentPay or equivalents)
- Safeguarding partners: social care, police
- Family courts or legal representatives under court direction
- Approved volunteers (where DBS clearance is required)
- External education and support professionals (e.g., Educational Psychologists, Early Help Teams)

All external providers are subject to **data processing agreements** under Article 28 UK GDPR.

## International Data Transfers

If data is stored or accessed outside the UK (e.g., cloud services like Microsoft 365), we ensure appropriate safeguards such as **Standard Contractual Clauses (SCCs)** or **UK International Data Transfer Agreements (IDTAs)**.

## Data Retention

Data is retained only as long as necessary to fulfil purposes and legal obligations:

- General parent/carer records: for the duration of your child's time at school
- FSM eligibility data: as required for audit or funding
- Safeguarding or court-related information: retained in line with statutory guidance
- Finance records: generally 6–7 years for audit purposes

Retention decisions follow the IRMS Records Management Toolkit for Schools.

## Your Data Protection Rights

You have the right to:

- Request access (Subject Access Request)
- Request correction of inaccurate data
- Request erasure in certain circumstances
- Request restriction of processing
- Object to processing on specific grounds
- Withdraw consent where used as the lawful basis

Some rights may not apply in all situations. To exercise your rights, contact the school office or DPO.

## Data Security

We take your data seriously. Measures include:

- Secure, encrypted systems for storing data
- Password protection and restricted staff access
- Staff training and data protection policies
- Physical security for paper records

## Contact & Complaints

Questions about data:

- **Admin an Finance Officer:** [admin@horningham.wilts.sch.uk](mailto:admin@horningham.wilts.sch.uk)
- **DPO:** [dpo@jeremyshatford.co.uk](mailto:dpo@jeremyshatford.co.uk)

If we cannot resolve your concerns then you may also complain to the Information Commissioner's Office, which is the UK's data protection regulator. Their contact details are:

- Phone: 0303 123 1113 or via their live chat. Opening hours are Monday to Friday between 9am and 5pm (excluding bank holidays).
- You can also report, enquire, register and raise complaints with the ICO: <https://ico.org.uk/make-a-complaint>

## Updates to This Notice

This Privacy Notice is reviewed regularly. The latest version is available on our website or from the office.

**Last Updated:** October 2025