



Horningsham Primary School

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

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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
- **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/carers (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@horningsham.wilts.sch.uk
- **DPO:** 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