# **Data Protection Policy**

At Primary Academy we respect the privacy of the children attending our sessions and the privacy of their parents or carers. Our aim is to ensure that all those using Primary Academy can do so with confidence that their personal data is being kept secure.

Our lead person for data protection is Victoria Petty. The lead person ensures that the service meets the requirements of the GDPR, liaises with statutory bodies when necessary, and responds to any subject access requests.

# Confidentiality

We respect confidentiality in the following ways:

We will only ever share information with a parent about their own child.

Information given by parents about their child will not be passed on to third parties without permission unless there is a safeguarding issue.

Concerns or evidence relating to a child's safety, will be kept in a confidential file.

All personal data is stored securely and where physical is in a lockable file.

#### Information that we keep

The items of personal data that we keep about individuals are documented on our personal data matrix. The personal data matrix is reviewed annually to ensure that any new data types are included.

Children and parents: We hold only the information necessary to provide our service for each child. This includes child registration information, medical information, parent contact information, attendance records and so forth. Our lawful basis for processing this data is fulfilment of our contract with the child's parents. Once a child leaves our service we retain only the data required by statutory legislation and industry best practice, and for the prescribed periods of time. Electronic data that is no longer required is deleted and paper records are disposed of securely.

### **Sharing information with third parties**

We will only share child information with outside agencies on a need-to-know basis and with consent from parents, except in cases relating to safeguarding children, criminal activity, or if required by legally authorised bodies (eg Police, HMRC, etc). If we decide to share information without parental consent, we will record this, clearly stating our reasons.

We will only share relevant information that is accurate and up to date. Our primary commitment is to the safety and well-being of the children.

Some limited personal information is disclosed to authorised third parties we have engaged to process it, as part of the normal running of our business, for example in order to take online bookings, and to manage our accounts. Any such third parties comply with the strict data protection regulations of the GDPR.

## Subject access requests

Parents/carers can ask to see the information and records relating to their child, and/ or any information that we keep about themselves. To make a request please contact us at hello@primary.academy.

We will make the requested information available as soon as practicable, and will respond to the request within one month at the latest.

If our information is found to be incorrect or out of date, we will update it promptly.

Parents /carers can ask us to delete data, but this may mean that we can no longer provide our service to the child as we have a legal obligation to keep certain data. In addition, even after a child has left our service we have to keep some data for specific periods so won't be able to delete all data immediately.

If any individual about whom we hold data has a complaint about how we have kept their information secure, or how we have responded to a subject access request, they may complain to the Information Commissioner's Office (ICO).

#### **GDPR**

We comply with the requirements of the General Data Protection Regulation (GDPR), regarding obtaining, storing and using personal data.

### **Remote Learning**

Our remote tuition is carried out using online platforms such as Zoom. Parents must be with their children at all times during remote tuition settings.

This policy was adopted by: Primary Academy	Date: May 1st 2024
To be reviewed: May 1st 2025	Signed:Proprietor