

THE CHARTER SCHOOLS

EDUCATIONAL TRUST

Privacy Notice for Emergency contacts

(Article 14 – contact details given by someone other than the data subject)

Author (s)	Shalene Varcoe
Functional area	GDPR
Scope	Trust
Reviewer (s)	DPO
Approver (s)	CEO
Version	002
Effective date	March 2023
Next review due	March 2026

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Privacy notice for emergency contacts

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 advises emergency contacts, e.g. carers and guardians of pupils other than their first priority carer, and emergency contacts for employee, of the Trust's data protection responsibilities on the collection and processing of their personal information.

You are being provided with this notice because your name and contact details have been given to the school on behalf of a pupil or an employee, to be contacted when the pupil's first priority contact cannot be reached or when an employee member needs their next of kin contacted.

This privacy notice explains how we collect, store and use personal data for emergency contacts.

We, The Charter Schools Educational Trust, are the 'data controller' for the purposes of data protection law.

Our Data Protection Officer (DPO) is Ms S Varcoe svarcoe@tcset.org.uk

The personal data we hold

Personal data is any information that relates to you that can be used directly or indirectly to identify you.

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

- Full name and title, home address, telephone and email contact details
- Relationship to the pupil or employee member and priority level of contact
- Any documentation given to us on behalf of a pupil or employee regarding the relationship between the emergency contact and the pupil/employee.
- CCTV images captured in school if the contact enters the school

Why we collect and process emergency contacts' personal data

We use this data to:

- Contact a representative for the pupil when the main parent/carer is not available
- Contact a representative for an employee when needed
- Provide appropriate pastoral care for pupils
- Protect pupil/employee welfare
- Comply with the law regarding pupil and employee welfare

Data protection principles

We process personal data about emergency contacts in accordance with the following data protection principles:

- Process personal data lawfully, fairly and in a transparent way.
- We collect personal data only for specified, explicit and legitimate purposes.
- We process personal data only where it is adequate, relevant and limited to what is necessary for the purposes of processing.
- We keep accurate personal data and take all reasonable steps to ensure that inaccurate personal data is rectified or deleted without delay.
- We keep personal data for no longer than is necessary for the purpose of the processing or, if for longer periods, for such reasons as permitted by data protection law.
- We adopt appropriate measures to make sure that personal data is secure, and protected against unauthorised or unlawful processing, and accidental loss, destruction or damage.

In our privacy notices, we tell individuals the reasons for processing their personal data, how we use such data and the legal basis for processing. We will not process personal data of individuals for reasons other than the stated purpose or purposes.

We will update personal data promptly if an individual advises that his/her information has changed or is inaccurate.

Our legal basis for using this data

We only collect and use emergency contacts' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation to pupils or employees.
- For a legitimate interest of the pupil or employee

Less commonly, we may also process emergency personal data in situations where:

- We have obtained consent to use it in a certain way.
- We need to protect an individual's vital interests (or someone else's vital interests). This may cover an emergency situation.

How do we obtain personal data?

We obtain personal data in a variety of ways. Emergency contact information is provided to us by parents or guardians of pupils on admissions forms or provided by employees directly. We also receive information about pupil contacts from other schools and agencies, such as healthcare professionals.

Collecting this information

Your personal information has been given to us by a parent or carer on behalf of a pupil or by an employee.

How do we protect personal data?

We take the security of personal data very seriously. We have internal policies and controls in place to try to ensure that data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the performance of their duties.

How we store this data

We keep personal information, such as emergency contacts' information, in secure Management Information Systems (MIS) and hard copies are kept filed with pupil or employee information in a locked, secure location with limited access.

Data sharing

We do not share personal data 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 data protection law) we may share personal information with:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions.
- The Department for Education - We share pupils' data with the DFE on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.
- The pupil's family and representatives
- Educators and examining bodies
- Our regulator e.g. Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for. E.g. providers of our school prospectus (if consent has been given to share your child's photograph)
- Financial organisations
- Central and local government
- Our auditors
- Research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Media or local news organisations – we may share photos of pupils and/or their results and achievements if you have given consent to this.
- Charities and voluntary organisations

- Police forces, courts, tribunals
- Professional bodies – e.g. data security contract with a third-party IT services provider or as part of a cloud-based storage system, these may process your personal data for the purpose of securely holding and protecting your data.

Rights regarding personal data

A parent/guardian or employee should inform you if they have given your details as a contact for a child or a member of staff. Individuals have a right to make a **'subject access request'** to gain access to personal information that the Trust or its schools holds about them.

Contacts have the right to make a subject access request with respect to any personal data the Trust or its schools holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- 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 or your child
- 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.

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our data protection officer. Please note there may be an administration fee to cover the cost of staffing for the request.

Other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to receive direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our Data Protection Officer (DPO).

Queries/ Contact us

If you have a question or concern about our data processing, please raise this with us in the first instance, please contact our Data Protection Officer: Ms S Varcoe at svarcoe@tcset.org.uk

Further guidance and advice on the above rights can be obtained from the ICO's website <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

We take any queries or questions about our collection and use of personal information very seriously.

Alternatively, for more information, you can contact the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF