



Holly Hill Primary School

Publishing for Transparency Procedure (D11)

Information resources to publish on the School website to comply with GDPR
Transparency requirements

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The following activities are designed to help the School make basic information available on its website that the public and the Regulator would expect to have available under GDPR. There is a requirement to be open and transparent about Data Processing and publishing the following information will be effective evidence that the School is complying.

1. Policies

The following documents should be published on a page where your main school policies are already published.

C3	<u>Data Protection Policy</u> Website, key information, policies https://www.hollyhillschool.co.uk/policies/ – link to internal GDPR page https://www.hollyhillschool.co.uk/gdpr-information-and-privacy-notices/
C4	<u>Statutory Requests for Information Policy</u> Website, key information, policies https://www.hollyhillschool.co.uk/policies/ – link to internal GDPR page https://www.hollyhillschool.co.uk/gdpr-information-and-privacy-notices/
F4	<u>Publication Scheme</u> Website, key information, policies https://www.hollyhillschool.co.uk/policies/ – link to internal GDPR page https://www.hollyhillschool.co.uk/gdpr-information-and-privacy-notices/

2. Privacy Statement & Notices

This content should be published on a web page that is ‘one-click’ away from the School website Home Page. Most website templates have Home Page links to content such as ‘Privacy Policy’ or ‘**About Cookies**’.

Main page, bottom - <https://www.hollyhillschool.co.uk/special/cookie-information/>

The following document is a statement covering the School's commitment to privacy and what information the website captures about users (including Cookies), therefore you only need one link to this.

D2.1	<u>Main Privacy Notice</u> Website, key information, policies https://www.hollyhillsschool.co.uk/policies/ – link to internal GDPR page https://www.hollyhillsschool.co.uk/gdpr-information-and-privacy-notices/
D2	<u>Main Privacy Notice – Child Friendly</u> Child Friendly Privacy Notice https://www.hollyhillsschool.co.uk/policies/ – link to internal GDPR page https://www.hollyhillsschool.co.uk/gdpr-information-and-privacy-notices/

On the page where the Privacy Notices are published, you should provide links to any of the following 'Privacy Notices' which are relevant to your school.

Each relevant Privacy Notice should be checked first to ensure the content is accurate and the School is satisfied that it can meet the commitments it is making through the Notices.

Each Privacy Notice should have its own URL (web address) to which you can provide links from any forms where you collect personal data.

On our School website each Privacy Notice is clearly shown as a downloadable PDF document. These are within the Key information, Policies (internal link to main GDPR information and Privacy notices which is also within Key Information).

D2.2 Curriculum and pastoral care	Delivery of the Curriculum and Pastoral Care
D2.3 Managing employment and legitimate interest docs x 3	Processing of Employee Data
D2.4 Managing School Governors	Processing of Governor Data
D2.5 Managing Security	Processing for Security purposes (including ID Cards and Visitor Data)
D2.6 Managing School Volunteers	Processing of school volunteer data

D2.7 Marketing Activities and legitimate interest doc	Processing under 'Consent' (e.g. Marketing)
D2.8 Online Payments	Processing of Online Payments
D2.9 Publishing Pupil Coursework and legitimate interest doc	Publishing Pupil Coursework
D2.10 School photos and other activities and legitimate interest doc	Processing under 'Consent' (use of Photo and Video, and additional school activities)
D2.12 School Visitors	Processing of visitor data
N/A	Processing of Biometric Data

As your school processes special category personal data it is required to have a Data protection Policy Statement to provide assurance on how it handles such information. This should also be published alongside your privacy notices

D14	Data Protection Policy Statement
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You should also publish your Security Measures Document (H2) alongside your privacy notices to make clear the steps the school has taken to protect the personal data in its custody.

H2	Security Measures Document
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3. Rights

The following document can be published to help parents/ guardians understand their rights when making Data Protection related requests of the School.

Although it is not technically a Policy, it is closely related to the content of the Statutory Requests for Information Policy and may make sense to publish alongside this Policy.

The Parents Guide to Subject Access Requests (SAR) clarifies when they are able to make a SAR and how to make a request, as well as managing expectations regarding timescales and what happens if their child is over 12.

D10b	<u>GDPR Rights Guidance for Parents/ Guardians</u> https://www.hollyhillschool.co.uk/policies/ – link to internal GDPR page https://www.hollyhillschool.co.uk/gdpr-information-and-privacy-notices/
F6	<u>Parents’ Guide to Subject Access Request</u> https://www.hollyhillschool.co.uk/policies/ – link to internal GDPR page https://www.hollyhillschool.co.uk/gdpr-information-and-privacy-notices/

4. Emails

It is good practice to add a disclaimer to all emails that leave your organisation, to protect any personal data within the communication. You can ask your IT Provider if they can add this to your global settings, so that it does not have to be added individually. The following is suggested wording:

This email and any attachments may contain legally privileged or confidential information. Any use, copying or disclosure other than by the intended recipient is unauthorised. If you have received this message in error, please notify the sender and confirm that it has been deleted from your system and no copies have been made.

**Please be reminded that the information contained in this guidance is provided to you under a license for use (which includes publication).
Please refer to the School’s License Certificate for further details**