



Camphill School Aberdeen

Service Users (Children & Young People) / Parents & Guardians Privacy Notice

1. Introduction

At Camphill School Aberdeen (CSA), we take your personal privacy seriously and we are fully committed to protecting your personal data. We will only process your personal data in accordance with applicable data protection laws.

At CSA we need your personal data to enable us to provide you with a suitable service tailored as much as possible to your unique individual requirements. We collect, process and store information about you that you have willingly provided or that is necessary for us to collect for us to meet our legal obligations as a provider of social care and education or pursue the legitimate interests of CSA.

This privacy notice tells you what sort of personal data we hold about you and why. It also tells you about the rights you have over your data.

This privacy notice is intended to provide information about how CSA Will use (or “process”) personal data about individuals including: its current, past and prospective service users; the service user’s parents, guardians and trading clients.

This notice has been updated to reflect the General Data Protection Regulations (GDPR) which came into force on 25th May 2018.

We regularly update our privacy notices.

2. How we use your Personal Data

CSA offers a number of services, including education, residential care, day services, and nursery provision.

We need information about you to:

- Undertake service user / pupil / young adult assessment (and to confirm the identity of potential service users/pupils and their parents /guardians).
- Undertake accurate assessments and reviews of your educational or social care needs.
- To safeguard service users/ pupil’s / young adults welfare and provide appropriate care.
- Monitor and improve our services.
- Keep in touch with parents / guardians, alumni and other members of the CSA community to keep them updated of the activities of CSA, including by sending updates and newsletters, by email and by post.
- To make use of photographic images in CSA publications, including our website, social media channels and emailed newsletters in accordance with the CSA policy on taking, storing and using images of service users/ pupils.

In addition, CSA will on occasion need to process **special category personal data**, for example information about your race, ethnic origin, politics, religion, genetics, biometrics, criminal records, health, sexual orientation in accordance with rights or duties imposed on us by law as regards safeguarding.

Under Article 9 (h) of the GDPR we can do this without consent but only for the following purposes:

Reference: GEN11

August 2023

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Address for correspondence: **Murtle House, Bielside, Aberdeen AB15 9EP • Telephone: +44(0)1224 867935 Fax: +44(0)1224 868420** www.camphillschool.org.uk

Camphill School Aberdeen is a business name of Camphill Rudolf Steiner Schools Limited. Registered company No.SC103899 (Scotland).

Registered office: Brodies House, 31 - 33 Union Grove, Aberdeen, AB10 6SD. Registered with the Scottish Commission for the Regulation of Care.

Accredited by the National Autistic Society. Member of the Association of Camphill Communities and Camphill Scotland. A Charity - No.SC015588

- For legal and regulatory purposes (for example child protection, safeguarding and H&S).
- To comply with CSA's legal obligation and duties of care.
- To provide the educational and social care services expected by CSA.

We will always contact you for your explicit consent if we require your information to be used outside this scope.

3. Sharing Your Story

Some people choose to tell us about their experiences at CSA to inform our work. This may include them sharing sensitive information related to their health.

If you give us your consent to do so, this information may be made public by us at events, in materials promoting our campaigning and fundraising work, or in documents such as our annual report.

4. Who has access to personal data and who CSA will share this with

CSA will normally only share your information with people involved in providing your education, care and support. If CSA are required to share your information with authorised partner organisations, we will ensure this is done in a secure manner and the information is proportionate in order for them deliver your services. These partners will include the local authority that commissioned our services and the relevant regulatory bodies.

We are obliged to provide personal data to the Care Inspectorate under Part 5 of the Public Services Reform (Scotland) Act 2010. This allows the Care Inspectorate to obtain and review the personal details of individual people experiencing care.

We are obliged to provide personal data under the Education (Scotland) Act 1980 which gives HM Inspectors of Education the power to obtain and review the personal details of individual people receiving education.

In both cases the regulators function is to provide ministerial and public assurance about the quality of care and education provided.

Parents / guardians and pupils are reminded that CSA is under duties imposed by law and statutory guidance to record and report incidents and concerns that arise or are reported. For further information please refer to the CSA safeguarding policy.

In the following circumstances, the law allows information to be shared without your knowledge:

- To prevent or detect crime.
- To prevent serious risk of harm to yourself if your behaviour constitutes a serious risk of harm to others, including any children to whom you may have access.

We may use and process your personal information where it is necessary for us to pursue our legitimate interests as a business, or that of a third party, for the following purposes:

- To correspond or communicate with you.
- To verify the accuracy of data that we hold about you and create a better understanding of you as a service user.
- For network and information security in order for us to take steps to protect your information against loss or damage, theft or unauthorised access.

- For prevention of fraud and other criminal activities.
- To comply with a request from you in connection with the exercise of your rights.
- For the management of queries, complaints, or claims.

5. How long we keep your personal information for

CSA will retain personal data securely and in line with how long it is necessary to keep for a legitimate and lawful reason.

CSA may need your personal information to establish, bring or defend legal claims. For this purpose, certain personal data of service users requires to be retained for a significant period of time. Please refer to the CSA Data Protection Policy for additional information.

6. Data Storage and Security

Unfortunately, the transmission of information via the internet is not completely secure and any transmission is at your own risk. Once we have received your personal information, we put in place reasonable and appropriate controls to ensure that it remains secure against accidental or unlawful destruction, loss, alteration, or unauthorised access. As far as possible all information you provide to us is stored electronically on our secure encrypted servers which are located within the European Economic Area (EEA), some archived data and working records are securely stored in paper form.

Where we collect any sensitive personal information about your ethnic background, sexual orientation, political opinions, religion, trade union membership or criminal record, we will apply additional security controls to protect that data.

7. Our obligations

We make every effort to keep all the personal data we hold secure, whether held electronically or as paper copies. We also ensure that only members of staff with a legitimate reason to access your information have permission to do so. Your information will only be kept for a specific amount of time after which it will be securely destroyed.

All those involved in providing education and social care to you are either registered with the appropriate professional body or under the direct supervision of someone who is. This means they have a professional obligation to treat personal data with the utmost confidentiality. In the case of social care this obligation is enforced by the Scottish Social Services Council (SSSC) and in the case of education services by the General Teaching Council for Scotland (GTCS).

8. Your Rights

In line with UK GDPR legislation, individuals have certain rights. Under certain circumstances you have rights under data protection laws in relation to your personal data:

- Request of access to your personal information (commonly known as a "**data subject access request**").
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data.
- Object to processing of your personal data where we are relying on a legitimate interest.
- Request restriction of processing of your personal data.
- Request the transfer of your personal data to you or to a third party.

- Withdraw consent at any time where we are relying on consent to process your personal data.

If you want to exercise any of your rights, please contact us.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive, or excessive. Alternatively, we could refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made several requests. In this case, we will notify you and keep you updated.

We will contact you primarily using your preferred contact method and limit the frequency of non-personalised communications wherever possible. You may opt out from receiving correspondence at any time via the contact details below.

More information on your rights can be found on the Information Commissioner's Office website – www.ico.org.uk

9. Data Protection Lead

If you wish to exercise those rights, you can contact:

Mr Alex Busch – Executive Director

Mr Martin Alfred – Safety, Community and Management Support Officer

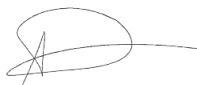
Camphill School Aberdeen, Central Office, Murtle Estate, Aberdeen, AB15 9EP

office@crss.org.uk

01224 867935

This Privacy Notice is proposed by Martin Alfred, Safety, Community and Management Support Officer, endorsed by the CSA Management Team, and approved by the Executive Director on 05/09/2023.

Signed:



Alex Busch, Executive Director

Review Date: August 2024