

Website Privacy Policy 2024-25

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| Date Accepted: | Autumn 2024 |
| Updated: | |
| Review Date: | Autumn 2025 |

1 Policy Statement

This notice explains what personal data (information) we hold about you, how we collect it, how we use it, and how we may share it. We are required to give you this information under data protection law.

2 Definitions

| Term | Definition |
|--|---|
| School | is Emneth Nursery School, Hollycroft Road, Emneth, Wisbech PE14 8AY. 01945 582401 |
| Department of Education (DfE) | is the government department which deals with education |
| Local Authority (LA) | is Norfolk County Council Martineau Lane, Norwich NR1 2DH |
| Headteacher | is Claire Hooker |
| Chair of Governors (CoG) | is Sarah Fairbrother |
| Business Manager | is Jill Ahearn |
| Designated Safeguarding Leads (DSL) | is Claire Hooker or Amy Thorpe and Hayley Auffret |
| Parents | Are either the parents, carers, or guardians |
| Schools Data Protection Officer (DPO) | is Satswana Ltd, Suite G12 Ferneberga House, Alexandra Road, Farnborough, GU14 6DQ. info@satswana.com |
| Website Service | Is Juniper [include link to their Privacy Policy documents] |
| Data Protection Act (DPA) | The Data Protection Act 2018 makes a provision about the processing of personal data, which is subject to GDPR, with an amendment in 2023. |
| UK General Data Protection Regulation (GDPR) | which applies across the European Union (including in the United Kingdom) |
| Freedom of Information Act (FoI) | The Freedom of Information Act 2000 discloses information held by public authorities or persons providing services for them and amends the Data Protection Act. |
| Educations Act (EA) | The Education Act 1996 consolidates the Education Act 1944 and certain other educational enactments. |
| Information Commissioners Office (ICO) | This organisation ensures compliance with the Data Protection Act, Freedom of Information Act, and GDPR and handles formal complaints. |
| Electronic Platform | An electronic platform is any means the school communicates. This could include, but is not limited to, Email, Online Portals, and Social Media platforms. |

3 Introduction

This privacy policy applies to all personal data processed by the School and its subsidiary companies, organisations, and clubs, collectively called the school

As amended or changed occasionally, this Website Privacy Policy explains how we collect, use, maintain and disclose user information obtained through this website. Occasionally, we may revise this Privacy Policy to reflect changes in law, our personal data collection and use practices, the features on the site, or advances in technology.

You shouldn't use this website if you don't want us to collect or process your personal information in the ways described in this policy. If you have any questions about your data or its use, please get in touch with our DPO.

4 What Data the School Processes

This section notes what personal data you collected from users and site visitors and why. Personal data is not just created by a user's interactions with this site. Personal data is also generated from technical processes such as contact forms, comments, cookies, analytics, and third-party embeds.

4.1 Content Management System

The website's core management does not collect any personal data about visitors. It only collects the data shown on the User Profile screen from registered user accounts for staff, governors, and pupils.

4.2 Comments

When visitors leave comments on the site, we collect the data shown in the comments form and the visitor's IP address and browser user agent string to help with spam detection.

4.3 Media

If you upload images to the website, you should avoid uploading images with embedded location data (EXIF GPS) included. Visitors can download and extract any location data from images on the website.

4.4 Cookies

Cookies are small data files sent from a server to your web browser. They are stored in your browser's cache and allow a website or a third party to recognise your browser. They are widely used to make websites work more efficiently and provide information to the site's owners.

Our website uses cookies and similar technologies to give you a better experience, enabling things like:

- basic site functions
- secure account login
- remembering account, browser, and regional preferences
- analysing site traffic and usage

Cookies store data about your use, but they are helpful because they allow us to help this site function and customise your experience. You can configure your desktop or mobile browser's settings to reflect your preference to accept or reject cookies, including how to handle third-party cookies (see our Cookie Policy for more information.)

Some technologies we use are necessary for critical functions like security and site integrity, account authentication, security and privacy preferences, internal site usage and maintenance data, and to make the site work correctly for browsing.

4.5 Embedded content from other websites

Articles on this site may include embedded content (e.g., videos, images, articles, etc.). Embedded content from other websites behaves like the visitor visiting another website.

These websites may collect data about you, use cookies, embed additional third-party tracking, and monitor your interaction with that embedded content, including tracing your interaction with the embedded content if you have an account and are logged in to that website.

4.6 Analytics

We use Google Analytics to monitor our site's performance and traffic. For more information, please see Google's privacy policy.

For Google Analytics Advertising Features, you can opt-out through Google Ads Settings, Ad Settings for mobile apps, or any other available means (for example, the NAI's consumer opt-out listed above). Google also provides a Google Analytics opt-out plug-in for the web.

5 How we use your personal information

We don't share your data with third parties in a way that reveals any of your personal information, such as email, name, etc., or for marketing purposes. However, some data is transferred or stored with third-party services we use, like our website provider and other cloud-based services.

5.1 Our website design, support and development company

Our Website Services provide ongoing support and maintenance for the website. They do not share that data with anyone outside of the company. They can access and edit all information held on the website.

5.2 Videos from YouTube

Our website uses plugins from YouTube, which Google operates. The operator of the pages is YouTube LLC, 901 Cherry Ave., San Bruno, CA 94066, USA.

If you visit one of our pages featuring a YouTube plugin, a connection to the YouTube servers is established. Here, the YouTube server will inform you about which of our pages you have visited. If you're logged in to your YouTube account, YouTube allows you to associate your browsing behaviour directly with your profile. You can prevent this by logging out of your YouTube account. YouTube is used to help make our website appealing. According to Art. 6 (1) (f) DSGVO, this constitutes a justified interest. Further information about handling user data can be found in YouTube's data protection declaration under <https://policies.google.com/privacy>.

5.3 Social Media Networks

We provide social media sharing buttons, links to our social media, and X (formerly Twitter) feeds to improve the website and communication across our community.

When you use social media platforms with this website, each platform has its technologies and policies to be aware of. For information on limiting the use of widgets and sharing functions with social networks, see below:

- For X (formally Twitter) widgets, you can find more information [here](#).
- For Facebook widgets, you can find more information [here](#).
- For Instagram widgets, you can find more information [here](#).
- For Pinterest widgets, you can find more information [here](#).

6 How long your data will be kept

We only retain your data for as long as necessary to fulfil the purposes for which we initially collected it unless otherwise required by law. We will also retain and use information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

If you leave a comment, the comment and its metadata are retained indefinitely until you ask us to erase them. This is so we can automatically recognise and approve any follow-up comments instead of holding them in a moderation queue.

We also store the personal information provided by users with accounts on our website in their user profiles. All users can see, edit, or delete their personal information at any time (except they cannot change their username), and website administrators can also see and edit that information.

Website and database backups may be kept for 12 months to ensure we can restore or rebuild the website in case of failure.

7 Your Rights

Under the GDPR, you have rights which you can exercise free of charge, which allow you to:

- Know what we are doing with your information and why we are doing it.

- Ask what information we hold about you (Subject Access Requests).
- Ask us to correct any mistakes in our information about you.
- Object to direct marketing.
- Make a complaint to the ICO.
- Withdraw consent (if applicable).

Depending on our reason for using your information, you may also be entitled to:

- Ask us to delete the information we hold about you.
- Have your information transferred electronically to yourself or another organisation.
- Object to decisions being made that significantly affect you.
- Object to how we are using your information.
- Stop using your information in specific ways.

We will always seek to comply with your request. However, we may be required to hold or use your information to comply with legal duties. Please note: your request may delay or prevent us from delivering your service.

For further information about your rights, including the circumstances they apply, see the ICO's guidance on individuals' rights under GDPR.

If you would like to exercise a right, please get in touch with our DPO.

8 Keeping your personal information secure

We take protecting your personal information seriously and aim to ensure this site is as secure as possible. We have implemented restrictions related to the storage of and the ability to access your personal information. These include:

- Daily malware scanning is done automatically on our hosting servers.
- Making regular, secure backups of your website data.
- Backups are kept in secure storage.
- Encouraging solid and unique passwords on all user accounts, using the integrated password strength indicator tool and encouraging users to change passwords periodically.
- Limiting the number of people with access to the website's CMS and admin
- Restricting access to sensitive website files with current best hardening practices.
- Individual accounts for users – no shared logins.
- Removing accounts (or resetting associated passwords) when employees with user accounts leave our community
- Transferring website files between local and public environments by secure transfer protocols (SFTP).

Our website platform is continually being upgraded and maintained by our Website Service The provider must keep updated with the latest versions, security practices, and technologies to help minimise security risk.

Please note that no Internet or electronic storage method transmission can be guaranteed 100% secure.

In case of a data breach, our system administrators will review affected users and attempt to reset passwords if needed after informing them. We will create a fresh backup, scan the site for malware, and try to identify the breach, removing any associated code and means of access. Subsequently, we will look at preventative measures to prevent a similar breach from happening again and take action where possible.

9 Complaints

If you have any concerns about how we handle your data, please get in touch with our DPO. If unsatisfied with our response, you can complain to the Information Commissioner's Office (ICO). You can contact the ICO at:

Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Tel: 0303 123 1113

Report a concern online at <https://ico.org.uk/make-a-complaint/>

10 Website Disclaimer

10.1 Introduction

This disclaimer governs your use of our website; by using our website, you accept this disclaimer in full. Do not use our website if you disagree with any part of this disclaimer.

10.2 Intellectual Property Rights

Unless otherwise stated, we or our licensors own the intellectual property rights in the website and material on the website. Subject to the licence below, all our intellectual property rights are reserved.

10.3 Limitations of Liability

The information on this website is provided free of charge, and you acknowledge that it would be unreasonable to hold us liable for this website and its information.

Whilst we endeavour to ensure that the information on this website is correct, we do not warrant its completeness or accuracy nor commit to ensuring that the website remains available or that the material is kept up to date.

To the maximum extent permitted by applicable law, we exclude all representations, warranties and conditions (including, without limitation, the conditions implied by law of satisfactory quality, fitness for purpose and the use of reasonable care and skill).

Our liability is limited and excluded to the maximum extent permitted under applicable law. We will not be liable for any direct, indirect or consequential loss or damage arising under this disclaimer or in connection with our website, whether arising in tort, contract or otherwise – including, without limitation, any loss of profit, contracts, business, goodwill, reputation, data, income, revenue or anticipated savings.

However, nothing in this disclaimer shall exclude or limit our liability for fraud, death or personal injury caused by our negligence or any other liability that cannot be excluded or limited under applicable law.

10.4 Variation

We may revise this disclaimer from time to time. Please check this page regularly to ensure you are aware of the current version.

10.5 Entire agreement

This disclaimer constitutes the entire agreement between you and us concerning your use of our website and supersedes all previous agreements regarding your use of this website.

10.6 Law and Jurisdiction

This notice will be governed by and construed under English law, and any disputes relating to this notice shall be subject to the exclusive jurisdiction of the courts of England.

11 Further information

For further information about how the DfE uses your information:

To learn more about the pupil information, we share it with the DfE for data collection:

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

For more information about the NPD, go to <https://www.gov.uk/government/publications/national-pupildatabase-user-guide-and-supporting-information>.

For more information about the DfE's data-sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>.

For information about which organisations the department has provided pupil information (and for which project), please visit the following: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>.

To contact DfE: <https://www.gov.uk/contact-dfe>.