



*Ettington Church of England
Primary School*

Privacy Notice for Parents and Pupils – How we use your information

2020/21

Who are we?

Ettington CofE Primary School is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Ettington CofE Primary School is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: Z634148X

What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our pupils and parents.

What is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information relates to personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

What personal information do we process about pupils and parents?

The pupil and parent information that we collect, hold and share includes:

- Personal information including a pupil's name, date of birth, unique pupil number and home address
- Characteristics such as ethnicity, language, and free school meal eligibility
- Attendance information such as sessions attended, number of absences and absence reasons.
- Educational information including records of work, assessment results, relevant medical information, details of pupils' special educational needs, exclusions/behavioural information, post-16 learning information.
- Contact information for parents, carers and other relatives, including telephone numbers, home addresses and e-mail addresses.

- Information about a child's home life, where required as part of necessary safeguarding and welfare processes.

Why do we use personal information?

We use pupil data:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing
- to safeguard pupils

Collecting pupil information

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

What are the legal reasons for us to process your personal information?

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. The lawful reasons we have for processing personal information are as follows:

1) To comply with the law

We collect and use general purpose pupil information in order to meet certain legal requirements and legal obligations placed upon the School by law. We therefore are required to this process personal information for such purposes even if you have not consented to us doing so.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

If you would like a copy of or further information regarding the statutory authorities that underpin our legal obligations, you should contact the School in writing.

2) To protect someone's vital interests

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

3) With the consent of the individual to whom that information 'belongs'

Whilst much of the personal information processed is in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

4) To perform a public task

It is a day-to-day function of the School to ensure that children receive the education and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that pupils are properly educated and supported

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

- 1) Explicit consent of the data subject
- 2) Processing relates to personal data which is manifestly made public by the data subject
- 3) Necessary for establishing, exercising or defending legal claims
- 4) Necessary for reasons of substantial public interest
- 5) Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
- 6) Necessary for archiving, historical research or statistical purposes in the public interest

The lawful reasons for each type of special category personal information data that we process is set out in the tables attached.

Who might we share your information with?

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- Local Public Health team
- NHS Test and Trace

We do not share information about our pupils or parents unless the law and our policies allow us to do so.

Please refer to the tables for information about what personal information is shared with which specific third parties.

Data collection requirements:

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

NHS Test and Trace/Public Health Agencies:

It may be necessary for us to share limited information with the above agencies in the event that an individual tests positive for Coronavirus, or if there is a Coronavirus outbreak. This will enable the named agencies to liaise with families to provide advice and support, and to take appropriate steps in responding to an outbreak. You have the right to object to the sharing of information with such agencies. This is not an absolute right and will be assessed on a case by case basis.

What do we do with your information?

All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected. School monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

How long do we keep your information for?

In retaining personal information, the School complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the Schools are required to retain the information.

A copy of those schedules can be located using the following link:
<http://irms.org.uk/page/SchoolsToolkit>

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

What are your rights with respect of your personal information?

Under data protection law, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or to have access to your child's educational record, contact the School Data Protection Officer at Warwickshire Legal Services via email at schooldpo@warwickshire.gov.uk or alternatively;

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Review

The content of this Privacy Notice will be reviewed October 1st 2021

Table 1 – Personal information we are required to process to comply with the law:		
Information Type	Relevant legislation	Third Parties with whom we share the information
Pupil Name	Education Regulations 2006	DfE, STA, Local Authority, MASH, ACE, Child's New School
Pupil Date of Birth	Education Regulations 2006	DfE, STA, Local Authority, MASH, ACE, Child's New School
Pupil Gender	Education Regulations 2006	DfE, STA, Local Authority, MASH, ACE, Child's New School
Pupil Address	Education Regulations 2006	DfE, STA, Local Authority, MASH, ACE, Child's New School
Family Contact Details	Education Regulations 2006	MASH, ACE, Child's New School
Family Links (siblings)	Children Act 2004	MASH, ACE
Pupil Special Educational Needs and Disability Records	Education Regulations 2013	DfE, STA, Local Authority, MASH, Child's New School
Free School Meal Eligibility	Education Regulations 2013	DfE, STA, Local Authority, MASH, Child's New School
Unique Pupil Number	Education Regulations 2013	DfE, Local Authority, ACE, Child's New School
Pupil Year Group	Education Regulations 2013	DfE, Local Authority, MASH, ACE, Child's New School
Admission Date	Education Regulations 2006	Local Authority
Pupil First Language	Education Regulations 2013	DfE, Local Authority
Previous School Settings Records	Education Regulations 2006	DfE, Local Authority
Attendance	Education Regulations 2006	DfE, Local Authority, MASH, ACE
Pupil Ethnicity	Education Regulations 2013	DfE, Local Authority, MASH, ACE
Pupil First Language (EAL)	Education Regulations 2013	DfE, Local Authority, MASH, ACE
Pupil Religion	-	MASH, ACE
Exclusions	Education Act 2002	Local Authority, Child's New School
Safeguarding Information and Records	Children Act 2004	DfE, MASH, ACE
Pupil Curriculum Assessment Information	Education Regulations 2006	DfE, STA, Local Authority, Child's New School
Child Looked After Status	Education Regulations 2013	DfE, Local Authority, MASH, Child's New School
Service Children Status	Education Regulations 2013	DfE, STA, Local Authority, Child's New School
Court Order	Children Act 2004	MASH, Child's New School

Table 2 – Personal information we are required to process as it is necessary to protect someone's vital interests		
Information Type	Special Category – additional lawful reason	Third Parties with whom we share the information

Pupil Dietary Needs	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of consent	Educaterers, Supply Teachers, FoES, Marle Hall Education Centre, Emergency Services, Ettington Church.
Pupil Medical Needs	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of consent	Supply Teachers, FoES, Marle Hall Education Centre, Emergency Services, Ettington Church,

Table 3 – Personal information we are required to process with the consent of the individual to whom that information ‘belongs’

Information Type	Special Category – additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Photographs and Videos	-	Website, Local Newspapers, SIMS, Pod, Integra Technology (CCTV)	Consent
Use of the Internet	-	-	Consent
Religion	Racial or ethnic origin Data subject has given explicit consent	MASH, ACE	Consent
Early Help	-	MASH, Child’s New School	Consent

Table 4 – Personal information we are required to process because it is necessary to do so in order to perform a public task

Information Type	Special Category – additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Pupil Name	-	O'track, Parent Pay, T2P, After School Clubs Compass School Nurse, S2S, SIMS, Educaterers, Fit4Schools, Base Wrap around Club, Warwickshire Music Services, Musicbox, SPAG.com, Marle Hall Residential Centre, Ettington Church/Open the Book Group, Local newspaper - Stratford Herald, Young Carers, Startford Bereavement Counselling Services, Early Help, EIS, Bikeability, DSP Photographers, Edufocus, Active Learn online, Google Classroom, Mathletics, Child’s New School, Regional South Warwickshire Sporting Events Co-ordinators, FFT	Public Task

Pupil Date of Birth	-	Compass School Nurse, SIMS, SPAG.com, Fit4Schools, Base, O' Track, Young Carers, Startford Bereavement Counselling Services, Early Help, EIS, Ed Psychology Services, SENDAR, IDS, FFT	Public Task
Pupil Gender	-	Compass School Nurse, SIMS, SPAG.com, Fit4Schools, Base, O' Track, Young Carers, Startford Bereavement Counselling Services, Early Help, EIS, Ed Psychology Services, SENDAR, IDS, FFT	Public Task
Priority Contact Name, Telephone Number, email address	-	Parent Pay, T2P, IDS, Education Phsycology Service, SENDAR, Compass School Nurse, Young Carers, Startford Bereavement Counselling Services, Early Help, EIS	Public Task
Family Links (siblings)	-	Parentpay	Public Task
Pupil Year Group, Class and (previous class)	-	O'track, Parent Pay, T2P, Playbox, After School Clubs, Compass School Nurse, S2S, SIMS, Educaterers, Fit4Schools, Denim, Warwickshire Music Services, Musicbox, SPAG.com, Marle Hall Residential Centre, Ettington Church/Open the Book Group, Young Carers, Stratford Bereavement Counselling Services, Early Help, EIS, Bikeability, DSP Photographers, Edufocus, Active Learn online, Mathletics, Google Classroom, Child's New School, FFT, Regional South Warwickshire Sporting Events Co-ordinators, Base Wrap Around Club (Polkadot), Mad Science, Sports for All, Lucy Cooke Mosaics, Kelly Stepney Sports Coach, IDS, Educational Psychology Services, SENDAR, Compass Nursing Services	Public Task
Teacher and (previous teacher)	-	O'track, Parent Pay, T2P, After School Clubs, Compass School Nurse, S2S, SIMS, Educaterers, Fit4Schools, Base,	Public Task

		Warwickshire Music Services, Musicbox, SPAG.com, Marle Hall Residential Centre, Ettington Church/Open the Book Group, Young Carers, Stratford Bereavement Counselling Services, Early Help, EIS, Bikeability, DSP Photographers, Edufocus, Active Learn online, Mathletics, Google Classroom, IDS, Educational Psychology Services, SENDAR,	
Special Educational Needs and Disability	-	Playbox, After School Clubs, Compass School Nurse, S2S, SIMS, Fit4Schools, Base, Marle Hall Residential Centre, Early Help, EIS.	Public Task
Free School Meals / Pupil Premium Eligibility	-	O'Track, Parent Pay, S2S, SIMS	Public Task
Unique Pupil Number	-	O'track, SEND, SIMS, Child's New School, Admissions, FFT	Public Task
Admission Date	-	O'track, Child's New School, Admissions, SIMS	Public Task
Attendance	-	S2S Census, ACE Referral Team, O Track.	Public Task
Dietary Needs	-	Educaterers, Parentpay, Compass, Foes	Public Task
Medical Needs	.-	After School Clubs, Compass School Nurse, SIMS, Fit4Schools, Base, Marle Hall Residential Centre, Edufocus	Public Task
Medical Practice	-	-	Public Task
Ethnicity	-	SIMS, S2S (Census) Local Authority Referrals- IDS, Ed Psych, SENDAR, WSCB, Stratford Bereavement Counselling Services, Early Help, EIS.	Public Task
Pupil First Language (EAL)	-	SIMS, S2S (Census) Child's New School	Public Task
School Meal Choice	-	Educaterers, Parentpay	Public Task
Modes of Travel to School	-	-	Public Task
Pupil Awards	-	-	Public Task
Pupil Curriculum Assessment Information	-	O'track, Supply Teachers, SEND Supported, FFT.	Public Task
Child Looked After Status	-	O'Track, Parent Pay, S2S, SIMS	Public Task
Service Children Status	-	O'Track, Parent Pay, S2S, SIMS	Public Task