

Ettington C of E Primary School

ETTINGTON C of E PRIMARY SCHOOL

Reviewed November 2024



Learning for Fullness of Life
Trust-Respect - Love

PRIVACY NOTICE FOR PUPILS & PARENTS

Date of publication: November 2024

Review date: November 2025

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Privacy Notice for Pupils - How we use your information

Who are we?

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

Ettington C of E Primary School is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number Z634148X.

You can contact the Trust as the Data Controller in writing at:

Ettington C of E Primary School

Churchill Close

Ettington

Stratford upon Avon

Warwickshire

CV37 7SP

admin3024@welearn365.com

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 reveals 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 staff?

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 and dietary information, details of pupils' special educational needs, suspensions and exclusions/behavioural information.
- Contact information for parents, carers and other emergency contacts, including telephone numbers, home addresses and email addresses.
- Information about a child's home life, where required as part of necessary safeguarding and welfare processes.
- Photographs and videos of pupils' learning and achievements.

Why do we use personal information?

We use pupil data to:

- 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.
- To keep our school communities safe and well.

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 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 with are 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 with are 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 with are set out in Table 4.

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. Please see *What Are Your Rights With Respect of Your Personal Data?* for more information.

5) We have a legitimate interest

Occasionally we have reasons to process information which fall outside of our usual day-to-day school functions. Details of the type of processing that we may undertake on this basis are set out in Table 5.

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. Please see *What Are Your Rights With Respect of Your Personal Data?* for more information.

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 sensitive category personal information 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 pupils attend after leaving us.
- Our local authority.
- The Department for Education (DfE), The Standards and Testing Agency (STA) and Ofsted.
- SEND service providers (SEND Supported, Educational Psychologist).
- Social welfare organisations (Connect 4 Health, Warwickshire Safeguarding Front Door, Warwickshire Attendance Service (WAS), Early Help, Ethnic Minority and Traveller Achievement Service EMTAS).
- Teaching and Learning (Welearn, Google Classroom (ICTDS), Mathletics, Rapid Reading, spag.com, Teach Active, Tapestry, Monster Phonics, White Rose Maths, TT Rockstars, Twinkl, Clicker 8, Thrive).
- Teaching, Learning and Curriculum Enrichment (Fit4Schools, Primary PPA, Supply Teachers,

External School Club providers)

- School administration (ESS Sims, ParentPay, Evolve Educational Visits portal, Cool Milk, CPOMS).
- Attainment and progress tracking system (O'Track).
- Catering Services (Educaterers).
- Children's names on event programmes such as Christmas plays, Harvest Festival, Easter Service.
- NHS, Public Health and other public agencies.

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) please browse to

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

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. The 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 Trust is 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 to your personal information?

Under data protection law, pupils and parents have the right to request access to information about them that we hold. To make a request for your personal information contact the School Data Protection Lead (Headteacher) or 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

Please ensure you specify which school your request relates to.

You also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress; please note that this is not an absolute right and you will need to provide reasons for your objection.
- Rectify incorrect information.
- 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.
- 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/>

Table 1 – Personal Information we are required to process to comply with the law				
Information Type	Relevant legislation	Special Category – additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Special Education Needs Records	Children’s and Families Act 2014, section 69		Local Authority	Legal Obligation
Attendance Register	Education (Pupil Registration) (England) Regulations 2006, Regulation 4, 10, 11 and 12		OFSTED, Local Authority	Legal Obligation
Common Transfer file	Education (Pupil Registration) (England) Regulations 2005, Regulation 6		School pupil transfers to	Legal Obligation
Safeguarding Information	Education Act 2002, section 175 Children’s Act 1989, Section 17, 47, 83. Children’s Act 2004, Section 11		Local Authority (Front Door)	Legal Obligation
Admissions Register	Education (Pupil Registration) (England) Regulations 2006, Regulation 4, 10, 11, 14 and 15		OFSTED Local Authority	Legal Obligation
Curricular Record including Assessment and achievement data	Education (Pupil Information) (England) Regulations 2005, Regulation 4		OFSTED, School pupil transfers to, Local Authority, STA	Legal Obligation
Educational Record	Education (Pupil Information) (England) Regulations 2005, Regulation 5 and 6		Parents, School pupil transfers to	Legal Obligation
Pupil Information i.e. name, age, address, Emergency contact details	Education (Information About Individual Pupils) (England) Regulations 2013, Regulation 3 and 5		Department of Education – school census. Other schools – when pupil transfers, Local Authority (Front Door)	Legal Obligation

Medical / Dietary / allergies		Necessary for preventative or occupational medicine	Department of Education – school census. Other schools – when pupil transfers	Legal Obligation
School Census	Education Act 1996, Sections 537 & 537A, and accompanying regulations		Department of Education	Legal Obligation
Free School Meals/Pupil Premium Eligibility	Education Regulations 2013		DfE, STA, Ofsted, Local Authority	Legal Obligation
Suspensions and Exclusions	Education Act 2002		Local Authority, Ofsted	Legal Obligation

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	Lawful reason for sharing
Medical and dietary information	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent	Medical staff i.e. paramedics/ambulance	Vital Interest
Religious belief	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent	Medical staff i.e. paramedics/ambulance	Vital Interest

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		Tapestry, Google Classroom, School Website, X (formerly Twitter), Prospectus, Newsletter, local press	Consent
Email Address		Not shared	Consent
Early Help		Local Authority (Front Door), School pupil transfers to	Consent

Table 4 – Personal information we are required to process because it is necessary to do so in order to perform a public task – please note that the right to object will apply to some of this processing, please see the section above that refers to ‘What are your rights with respect to your personal information?’

Information Type	Special Category – additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Pupil Name		ESS SIMS, Educaterers, CPOMS, School Cloud, ParentPay, Welearn, Google Classroom and Microsoft Teams (ICTDS), Tapestry, 3P Learning (Mathletics), spag.com , Cool Milk, White Rose Maths, Teach Active, Rapid Reading (Pearson), EMTAS, Supply Teachers, Fit 4 Schools, External After School Club Providers, PTA, Connect For Health, SEND Supported, Evolve, Times Tables Rockstars, Public Health and other public health agencies, Primary PPA, O’Track, Teachers 2 Parents	Public Task
Pupil Date of Birth		ESS SIMS, CPOMS, School Cloud, ParentPay, WeLearn (ICTDS), Google Classroom, Tapestry, 3P Learning (Mathletics), EMTAS, Connect For Health, SEND Supported, Public Health and other public health agencies, Primary PPA, O’Track, Fit4Schools, Cool Milk	Public Task
Pupil Gender		ESS SIMS, CPOMS, School Cloud, ParentPay, WeLearn (ICTDS), Google Classroom, Tapestry, 3P Learning (Mathletics), EMTAS, Connect For Health, SEND Supported, Public Health and other public health agencies, Primary PPA, O’Track, Fit4Schools	Public Task

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Mother/Father Priority Contact Name, Telephone Numbers and Email Addresses		ESS SIMS, School Cloud, ParentPay, Cool Milk, EMTAS, Connect For Health, SEND Supported, Public Health and other public health agencies, Teachers2Parents	Public Task
Family Links (Siblings)		ESS SIMS, CPOMS, School Cloud, ParentPay, Teachers2Parents	Public Task
Emergency Contact Name, Telephone Numbers and Email Addresses			Public Task
Pupil Year Group		ESS SIMS, Educaterers, CPOMS, School Cloud, ParentPay, Welearn, Google Classroom (ICTDS), 3P Learning (Mathletics), spag.com , Cool Milk, EMTAS, Supply Teachers, Fit 4 Schools, External After School Club Providers, PTA, Compass, SEND Supported, Times Tables Rockstars, Public Health and other public health agencies, Tapestry, Primary PPA, Evolve, Teachers 2Parents	Public Task
Class (and previous classes)		ESS SIMS, Educaterers, CPOMS, School Cloud, ParentPay, Welearn, Google Classroom (ICTDS), Mathletics, spag.com , Cool Milk, EMTAS, Supply Teachers, Fit 4 Schools, External After School Club Providers, PTA, Compass, SEND Supported, Times Tables Rockstars, Public Health and other public health agencies, Tapestry, Evolve, Primary PPA, Teachers2Parents	Public Task
		ESS SIMS, Educaterers, CPOMS, School Cloud,	

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Teacher (and previous teachers)		ParentPay, Welearn, Google Classroom (ICTDS), Mathletics, spag.com , Cool Milk, EMTAS, Supply Teachers, Fit 4 Schools, External After School Club Providers, PTA, Compass, SEND Supported, Times Tables Rockstars, Public Health and other public health agencies, Tapestry, Evolve, Primary PPA	Public Task
Special Educational Needs and Disability		ESS SIMS, Supply Teachers, Fit4Schools, Primary PPA, External After School Club Providers, SEND Supported	Public Task
Free School Meals/Pupil Premium Eligibility		ESS SIMS, Educaterers, ParentPay, Cool Milk, EMTAS, Supply Teachers, SEND Supported, Primary PPA, After School Club External Providers	Public Task
Unique Pupil Number		ESS SIMS, CPOMS, SEND Supported, Evolve	Public Task
Admission Date		ESS SIMS	Public Task
Attendance		ESS SIMS, ParentPay, EMTAS, Supply Teachers, Fit4 Schools, External After School Club Providers, SEND Supported, DfE	Public Task
Pupil First Language (EAL)		ESS SIMS, ParentPay, EMTAS, Supply Teachers, Fit4 Schools, External After School Club Providers, SEND Supported, DfE	Public Task
School Meals Choice		Educaterers, ParentPay	Public Task
Modes of Travel to School		ESS SIMS	Public Task
Pupil Awards			Public Task
Pupil Curriculum Assessment Information		ESS SIMS, Supply Teachers, SEND Supported, Primary PPA	Public Task

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Child Looked After Status		ESS SIMS, SEND Supported	Public Task
Service Children Statuses		ESS SIMS	Public Task