



WELLESBOURNE CE PRIMARY AND NURSERY SCHOOL

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

Who are we?

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

Wellesbourne CE Primary and Nursery School is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: Z6262628

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

Wellesbourne CE Primary School
Mountford Close
Wellesbourne
CV35 9QG
Admin3073@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 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, nationality, country of birth 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
- Photographs and videos of pupils' learning and achievements.

Why do we use personal information?

We use pupil data:

- to support pupil learning
- to monitor and report on pupil attainment and progress
- to track how well the school as a whole is performing
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing
- to safeguard pupils
- to get in touch with parents when we need to

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 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
- Schools in the Federation (Tysoe CE Primary School, Wellesbourne CE Primary)
- the Department for Education (DfE), The Standards and Testing Agency (STA) and Ofsted
- SEND service providers (SEND Supported)
- Social Welfare organisations (Compass, Multi-Agency Safeguarding Hub (MASH), Attendance Compliance and Enforcement Service (ACE), Early Help, Ethnic Minority and Traveller Achievement Service (EMTAS))
- Teaching and Learning (Welearn (ICTDS), Athletics, Accelerated Reader, Spelling Frame)
- Teaching, Learning and Curriculum Enrichment (Onside Coaching, Onside, Calypso Kids, Supply Teachers, External School Club providers)
- School administration application (SIMS, ParentPay, Evolve Education Visits portal, Cool Milk)
- Attainment and progress tracking system (Insight tracking).

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>.

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 school 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

****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;
- 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 each September.

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
Pupil Name	Education Regulations 2013	-	DfE, STA, Local Authority, MASH, ACE, Child's New School	Legal Obligation
			Parentpay online payment system Tapestry online learning journal (Nursery & Reception pupils only) Maths Circle online maths resource Spelling Frame Cool Milk (Nursery & Reception pupils only) Family (Nursery & WOOSH pupils only) SIMS, MASH, WeLearn, Accelerated Reader, NFER, Insight tracking online data tracking system Onside, Wade Gym, Paul Eden Football	Consent of the individual to whom that information 'belongs'
Pupil Date of Birth	Education Regulations 2013	-	DfE, STA, Local Authority, MASH, ACE, Child's New School	Legal Obligation
Pupil Gender	Education Regulations 2013	-	DfE, STA, Local Authority, MASH, ACE, Child's New School	Legal Obligation
Pupil Address	Education Regulations 2006	-	DfE, STA, Local Authority, MASH, ACE, Child's New School	Legal Obligation
Family Contact Details	Education Regulations 2006	-	MASH, ACE, Child's New School	Legal Obligation
Family Links (Siblings)	Children Act 2004	-	MASH, ACE	Legal Obligation
Pupil Special Educational	Education Regulations	-	DfE, STA, Local Authority, Child's	Legal Obligation

Needs and Dietary Records	2013		New School	
Free School Meal Eligibility	Education Regulations 2013	-	DfE, STA, Local Authority, Child's New School	Legal Obligation
Unique Pupil Number	Education Regulations 2013	-	DfE, Local Authority, MASH, ACE, Child's New School	Legal Obligation
Pupil Year Group	Education Regulations 2013	-	DfE, Local Authority, MASH, ACE, Child's New School	Legal Obligation
Admission Date	Education Regulations 2006	-	Local Authority	Legal Obligation
Pupil First Language	Education Regulations 2013	-	DfE, Local Authority	Legal Obligation
Previous School Settings Records	Education Regulations 2006	-	DfE, Local Authority	Legal Obligation
Attendance	Education Regulations 2006	-	DfE, Local Authority, MASH, ACE	Legal Obligation
Pupil Ethnicity	Education Regulations 2013	Racial or ethnic origin	DfE, Local Authority, MASH, ACE	Data subject has given explicit consent
Pupil First Language (EAL)	Education Regulations 2013	-	DfE, Local Authority, MASH, ACE	Legal Obligation
Pupil Religion		Data subject has given explicit consent	MASH, ACE	Legal Obligation
Exclusions	Education Act 2002	-	Local Authority, Child's New School	Legal Obligation
Safeguarding Information and Records	Children Act 2004	-	DfE, MASH, Child's New School	Legal Obligation
Pupil Curriculum Assessment Information	Education Regulations 2006	-	DfE, STA, Local Authority, Child's New School	Legal Obligation
Child Looked after Status	Education Regulations 2013	-	DfE, Local Authority, MASH, Child's New School	Legal Obligation
Service Children Status	Education Regulations 2013	-	DfE, STA, Local Authority, Child's New School	Legal Obligation
Court Order	Children Act 2004	-	MASH, Child's New School	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
Pupil Dietary needs	Health Information	Supply teachers, PTA, Emergency Services	Necessary for preventative or occupational medicine
Pupil Medical needs	Health Information	Supply teachers, PTA, Emergency Services	Necessary for preventative or occupational medicine

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	-	SIMS, Website, Twitter, Nursery Facebook	-
Use of the Internet	-		-
Religion	Religious or philosophical beliefs	MASH, ACE	Data Subject has given explicit consent
Early Help	-	MASH, Childs New School	-

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	-	Insight tracking, SIMS, Parentpay, Welearn (ICTDS), Maths Circle, Spelling Frame, Accelerated Reader, NFER, Tapestry, Cool Milk, Supply Teachers, Onside, Wade Gym, Paul Eden Football, Onside, Friends, Family, Compass, SEND Supported, Language Screen	-
Pupil Date of Birth	-	Insight tracking, SIMS, Parentpay, Welearn (ICTDS), Maths Circle, Spelling Frame, Accelerated Reader, NFER, Tapestry, Family, Cool Milk, Compass, SEND Supported, Language Screen	-
Pupil Gender	-	Insight tracking, SIMS, Parentpay, Maths Circle, Spelling Frame, Accelerated Reader, NFER, Tapestry, Family, Compass, SEND Supported, Language Screen	-
Mother/Father Priority Contact Name, telephone numbers and email address	-	SIMS, Parentpay, Family, Cool Milk, Compass, SEND Supported	-
Family Link (Siblings)	-	SIMS, Parentpay,	-
Pupil Year Group	-	Insight tracking, SIMS, Parentpay, Welearn (ICTDS), Maths Circle, Spelling Frame, NFER, Accelerated Reader, Tapestry, Cool Milk, Supply Teachers, Onside, Family, Wade Gym, Paul Eden Football, Onside, Friends, Compass, SEND Supported	-
Class (and previous classes)	-	Insight tracking, SIMS, Parentpay, Welearn (ICTDS),	-

		Maths Circle, Spelling Frame, Accelerated Reader, NFER, Cool Milk, Supply Teachers, Onside, Wade Gym, Paul Eden Fencing, Onside, Friends, Compass, SEND Supported	
Teacher (and previous Teachers)	-	Insight tracking, SIMS, Parentpay, Welearn (ICTDS), Maths Circle, Spelling Frame, Accelerated Reader, NFER, Tapestry, Cool Milk, Supply Teachers, Onside, Wade Gym, Paul Eden Fencing, Onside, Friends, Compass, SEND Supported	-
Special Educational Needs and Disability	-	Insight tracking, Supply Teachers, Onside, Wade Gym, Onside, Paul Eden Football, SEND Supported	-
Free School Meals/Pupil Premium Eligibility	-	Insight tracking, SIMS, Parentpay, Welearn (ICTDS) Cool Milk, EMTAS, Supply Teachers, SEND Supported	-
Unique Pupil Number	-	Insight tracking, SIMS, SEND Supported, Language Screen	-
Admission Date	-	Insight tracking	-
Attendance	-	Insight tracking, SIMS, Parentpay, EMTAS, Supply Teachers, Onside, Wade Gym, Onside, Paul Eden Football, SEND Supported	-
Dietary Needs	Health Information	SIMS, Parentpay, Friends, Compass	Necessary for preventative or occupational medicine
Medical Needs	Health Information	SIMS, Supply Teachers, Onside, Wade Gym, Onside, Paul Eden Football, Friends, Compass, SEND Supported	Necessary for preventative or occupational medicine

Medical Praactice	-	-	-
Ethnicity	Racial or ethnic origin	Insight tracking	Data Subject has given explicit consent
Pupil First Language (EAL)		Insight tracking, Supply Teachers, Onside, Wade Gym, Paul Eden Football, Onside, SEND Supported, Language Screen	Public Task
School Meals Choice	-	ParentPay	-
Modes of Travel to School	-		-
Pupil Awards	-		-
Pupil Curriculum Assessment Information	-	Insight tracking, Supply Teachers, SEND Supported	-
Child Looked After Status	-	Insight tracking, SEND Supported	-
Service Children Status	-	Insight tracking	-