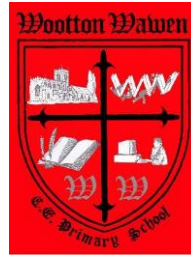


## WOOTON WAWEN CE PRIMARY SCHOOL



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

2021/2023

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#### Who are we?

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

**Wootton Wawen CE Primary School** is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: [ZA426520](#)

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

**Wootton Wawen CE Primary School, Alcester Road, Wootton Wawen, Warwickshire. B95 6AY** or [admin3074@welearn365.com](mailto:admin3074@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.

### **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
- To share medical information

### **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 & 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. 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](mailto: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 **in September 2022**

**Table 1** – Personal information we are required to process to comply with the law:

The Management Information system we use in school is SIMs and it collects much of this information which can then be stored and used securely

<b>Information Type</b>	<b>Relevant legislation</b>	<b>Special Category – additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Lawful reason for sharing</b>
Pupil full name	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	Local Authority Department of Education School to which pupil has transferred	Legal obligation
			SIMS – Management information system EVOLVE- off site health and safety ParentPay online payment system Too Simple online learning journal Warwickshire School Health & Wellbeing Service (provided by Compass) Parentseveningsystem.co.uk	Consent of the individual to whom that information 'belongs'
			Other local schools e.g. for sports events/ transition events EDUCATER – assessment system	Performance of a public task
Gender	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	Local Authority Department of Education School to which pupil has transferred EVOLVE- off site health and safety	Legal obligation
			SIMS – Management information system ParentPay online payment system Parentseveningsystem.co.uk Educater - assessment system	Consent of the individual to whom that information 'belongs'  Performance of a public task

Date of Birth	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	Local Authority Department of Education School to which pupil has transferred	Legal obligation
			SIMS – Management information system ParentPay online payment system Accelerated Reading Warwickshire School Health & Wellbeing Service (provided by Compass) Parentseveningsystem.co.uk	Consent of the individual to whom that information 'belongs'
			STATonline assessment system	Performance of a public task
Home address	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	Local Authority Department of Education School to which pupil has transferred	Legal obligation
			SIMS – Management information system ParentPay online payment system Warwickshire School Health & Wellbeing Service (provided by Compass)	Consent of the individual to whom that information 'belongs'
First Language	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	Local Authority Department of Education School to which pupil has transferred SIMS – Management information system	Legal obligation
Ethnicity	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)		Local Authority Department of Education School to which pupil has transferred	Legal obligation
			SIMS – Management information system	Consent of the individual to whom that information 'belongs'
National Identity, Country of Birth, Nationality	Education Act 1996 Section 537A		Local Authority Department of Education School to which pupil has transferred	Legal obligation
Date of admission to school	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	Local Authority Department of Education School to which pupil has transferred	Legal obligation
			SIMS – Management information system	Consent of the individual



				to whom that information 'belongs'
Last school attended - name and address	The Education (Pupil Information) (England) Regulations 2005 Regulation 5	n/a	Local Authority Department of Education School to which pupil has transferred	Legal obligation
National curriculum year group	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	Local Authority Department of Education School to which pupil has transferred	Legal obligation
			SIMS – Management information system ParentPay online payment system Parentseveningsystem.co.uk	Consent of the individual to whom that information 'belongs'
			Educater assessment system	Performance of a public task
Unique pupil number	Education Act 1996 Section 537A	n/a	Local Authority Department of Education School to which pupil has transferred	Legal obligation
			SIMS – Management information system	Performance of a public task
Eligibility for Free School Meals	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	Local Authority Department of Education School to which pupil has transferred	Legal obligation
			ParentPay online payment system	Consent of the individual to whom that information 'belongs'
Mode of Travel to School	Education Act 1996 Section 508A	n/a	Local Authority Department of Education School to which pupil has transferred	Legal obligation
Proficiency in English	Education Act 1996 Section 537A	n/a	Local Authority Department of Education School to which pupil has transferred	Legal obligation (Census)
Whether a pupil is looked after and the Local Authority by	The Education (Information about Individual Pupils) (England) Regulations 2013	n/a	Local Authority Department of Education School to which pupil has transferred	Legal obligation

whom the pupil is looked after	Regulation 3(2)			
Where a pupil has been but is no longer looked after, the type of order resulting in them no longer being looked after	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	Local Authority Department of Education School to which pupil has transferred	Legal obligation
Special Educational Needs status, start date, details of needs and provision	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	Local Authority Department of Education School to which pupil has transferred  Outside agencies such as CAMHS	Legal obligation  Consent
Details of exclusions: start and end dates, number of sessions, fixed length/permanent, reason for exclusion	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	Local Authority Department of Education School to which pupil has transferred	Legal obligation
Assessment date – end of key stage and Year 1 phonics screening	The Education (Pupil Information) (England) Regulations 2005	n/a	Local Authority Department of Education School to which pupil has transferred	Legal obligation
Pupil Annual Reports	The Education (Pupil Information) (England) Regulations 2005	n/a	School to which pupil has transferred	Legal obligation
Attendance records including whether absence was authorised/ unauthorised and reason for absence	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	Local Authority Department of Education School to which pupil has transferred	Legal obligation
Parents' names and addresses	The Education (Pupil Information) (England)	n/a	Local Authority Department of Education	Legal obligation

	Regulations 2006 Regulation 5 (1)(c)		School to which pupil has transferred Warwickshire School Health & Wellbeing Service (provided by Compass)	
Parents' telephone number (if pupil usually resides with them)	The Education (Pupil Information) (England) Regulations 2006 Regulation 5 (1)(c)	n/a	SIMs	Legal obligation
Pupil assessment data (Curricular record)	The Education (Pupil Information) (England) Regulations 2005, Regulation 4		Educater - assessment system School Governors Local Authority Department of Education School to which pupil has transferred	Performance of a public task

**Table 2** – Personal information we are required to process as it is necessary to protect someone’s vital interests

<b>Information Type</b>	<b>Special Category - additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Lawful reason for sharing</b>
Medical information including allergies	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent	Emergency services	Protection of vital interests

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

<b>Information Type</b>	<b>Special Category - additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Lawful reason for sharing</b>
Parent mobile telephone number	n/a	ParentPay online payment system	Consent of the individual to whom that information ‘belongs’
Parent email address	n/a	ParentPay online payment system Parents’ Evening booking system	Consent of the individual to whom that information ‘belongs’
Pupil images	n/a	Media	Consent of the individual to whom that information ‘belongs’
Parent name, date of birth, National Insurance Number, 30 hours eligibility code (Nursery children only)	n/a	Local Authority SIMS	Consent of the individual to whom that information ‘belongs’



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

<b>Information Type</b>	<b>Special Category - additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Lawful reason for sharing</b>
Names, telephone numbers and addresses of emergency contacts other than parent(s) with whom pupil resides	n/a	Not shared	n/a
Registration group	n/a	ParentPay online payment system	Consent of the individual to whom that information 'belongs'
Child Protection and Safeguarding documentation including concern forms and case documentation	n/a	Local Authority	Legal requirement – Children’s Act 1989, sections 17 and 47
		Police Social services	Performance of a public task
Special Educational Needs documentation including SEND provision maps, Personal Learning Plans, Education, Health and Care Plans, reports from external agencies	n/a	Local Authority	Performance of a public task
Dietary restrictions	n/a	ParentPay online payment system Educaterers	Consent of the individual to whom that information 'belongs'
Medical information including allergies	Necessary for preventative or occupational medicine	Warwickshire School Health & Wellbeing Service (provided by Compass)	Consent of the individual to whom that information 'belongs'



