Greatworth Primary School

Privacy Notice for Parents & Pupils

Statutory Policy	Yes	
Published on Website	Yes	
Policy Ownership	Head Teacher	Yes
	Full Governing Board	Yes
Implementation Date	September 2024	
Review Frequency	Annually	
Date of Last Review	September 2026	
Next Review Date	September 2027	

Who we are?

Greatworth Primary School is the 'data controller' for the purposes of GDPR. This means that we are responsible for how your personal information is processed and for what purposes.

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

Greatworth Primary School
Helmdon Road
Greatworth
Nr Banbury OX17 2DR

head@greatworth.northants-ecl.gov.uk

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, gender, date of birth, unique pupil number, home address and family links.
- 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 and achievement, assessment results, relevant medical and dietary information, details of pupils' special educational needs, exclusions/behavioural information and previous schools/ settings attended.

- 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 get in touch with parents when we need to.
- To support teaching and 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

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 Regulations, 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 this 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 pupils attend after leaving us.
- Our local authority.
- The Department for Education (DfE), The Standards and Testing Agency (STA) and Ofsted.
- SEND service providers ie Dyslexia testing, Action Autism, Educational Psychologists, Speech and Language Therapists.

- Social welfare organisations ie Multi-Agency Safeguarding Hub (MASH), Attendance Compliance and Enforcement Service (ACE), Early Help, Ethnic Minority and Traveller Achievement Service EMTAS)).
- Teaching and Learning ie Spellingframe, Tapestry.
- Teaching, Learning and Curriculum Enrichment ie Greatworth Hall Farm, Brackley Swimming, External School Club providers
- School administration applications ie ParentMail, ParentPay, Limes Farm, Cool Milk.
- Attainment and progress tracking system ie Fischer Family Trust.

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/datacollection-and-censuses-for-schools.

What do we do with your information?

All personal information is held in our school management information system (SIMS) 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 has been guided by the recommendations detailed in 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 these schedules can be found using the following link:

https://irms.org.uk/page/SchoolsToolkit

The specific retention durations for Greatworth Primary School are summarised in the School Data Retention Policy dated April 2019.

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 regarding your personal information?

Under data protection legislation, parents and students have the right to request access to information about them that we hold, (this is known as a Subject Access Request). To make a request for your personal information, or be given access to your child's educational record, in the first instance please contact the Head Teacher.

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 can raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at https://ico.org.uk/concerns/ .

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Appendix 1 – Personal Information Tables

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 information**	**Lawful reason for sharing**
Pupil Information (name, age, gender, address, emergency contact, ethnicity, country of birth, unique pupil number)	Education Regulations 2013	-	Department of Education, Local Authority, MASH, Pupils New School	Legal Obligation
Family Links (Siblings)	Children Act 2004	-	MASH	Legal Obligation
Medical / Dietary / Allergies		Necessary for preventative or occupational medicine	Department of Education – school census, MASH, Pupils New School	Legal Obligation
Attendance	Education Regulations 2006		Department of Education, Local Authority, MASH, Pupils New School	Legal Obligation
Admissions	Education Regulations 2006	-	Department of Education, Local Authority	Legal Obligation
Common Transfer File	Education Regulations 2006		Other schools when pupil transfers	Legal Obligation
Educational Record	Education Regulations 2006		Parents, other schools when pupil transfers	Legal Obligation
Pupil Special Education Needs report	Children's and Families Act 2014	-	Local Authority	Legal Obligation
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 information	Lawful reason for sharing
Safeguarding Information	Education Act 2002, Children's Act 1989, Children's Act 2004	-	Department of Education, Local Authority, MASH, Pupils New School	Legal Obligation
Pupil Curriculum Assessment Information	Education Regulations 2006	-	Department of Education, Local Authority, Pupils New School	Legal Obligation
Exclusions	Education Act 2002	-	Local Authority, Pupil's New School	Legal Obligation
School Census	Education Act 1996	-	Department of Education, Local Authority	Legal Obligation
Pupil Year Group	Education regulations 2013	-	Department of Education, Local Authority, MASH, Pupils New School	Legal Obligation
Free School Meal Eligibility	Education regulations 2013	-	Department of Education, Local Authority, Pupils New School	Legal Obligation
Child Looked After Status	Education regulations 2013	-	Department of Education, Local Authority, MASH, Pupils New School	Legal Obligation
Service Children Status	Education regulations 2013	-	Department of Education, Local Authority, Pupils New School	Legal Obligation
Court Order	Children Act 2004		MASH, Pupils 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 information**	**Lawful reason for sharing**
Pupil Medical Information	Health information – necessary to protect vital interests of the data subject.	School staff, supply teachers, PTA, Emergency Services, Medical Staff	Necessary for preventative or occupational medicine
Pupil Dietary Needs	Health information – necessary to protect vital interests of the data subject.	School staff, supply teachers, PTA, Emergency Services, Medical Staff	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 information**	**Lawful reason for sharing**
Photographs and Videos	-	School website, Twitter, Reports to Parents, Prospectus, Newsletters, School Displays	Consent
Use of the Internet	-	-	-
Religion	Religious or philosophical beliefs	MASH	Data subject has given explicit 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 information**	**Lawful reason for sharing**
Pupil Information (name, age, address, emergency contact, etc)		Department of Education, Local Authority, MASH, Pupils New School. School Staff, Supply Teachers, School Meal Providers, External Club Providers, PTA, Parent Mail.	Public Task & Legal Obligation

Academic Progress Data, Staff Observations		OFSTED, Department of Education, Local Authority, MASH, Parents, Pupils New School.	Public Task & Legal Obligation
Safeguarding Information, Medical, Special Educational Needs		Department of Education, Local Authority, MASH, Parents, Pupils New School.	Legal Obligation