

- 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: *(please note this list is not exhaustive)*

- schools that the pupils attend after leaving us
- our local authority and the Department for Education (DfE)
- other schools (when the children move on)
- SEND Support - educational special needs support
- Jane Stapleton – Photographer and Year Books
- GoBubble – children’s social media
- Evolve – education visits application/organiser
- Nessy learning – SEN Reading
- Skoolbo – Languages
- TT Rockstars – Times tables
- Athletics – Maths
- Renaissance – reading
- Bug Club – reading
- OTrack – assessment
- Class Dojo - communication between class teacher and parent
- Webanywhere – school website and app
- Teachers 2 Parents – fast communication with school news/events etc

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 18th May 2019

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
Admissions Information	Education (Pupil Registration) (England) Regulations 2006, Regulation 4, 10, 11, 14 and 15		OFSTED Local Authority	Legal Obligation
Assessment and achievement data	Education (Pupil Information) (England) Regulations 2005, Regulation 4		OFSTED Schools Local Authority	Legal Obligation
Attendance records	Education (Pupil Registration) (England) Regulations 2006, Regulation 4, 10, 11 and 12		OFSTED Schools Local Authority	Legal Obligation
Educational records	Education (Pupil Information) (England) Regulations 2005, Regulation 5 and 6		Parents Schools	Legal Obligation
Medical/dietary/allergies		Necessary for preventative or occupational medicine	Department of Education – School Census, Schools	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, Schools, Warwickshire Police	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, NHS	Legal Obligation

Information Type	Relevant legislation	Special Category–additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
School census	Education Act 1996, Sections 537 & 537A, and accompanying regulations		Department of Education	Legal Obligation
SEN information	Children's and Families Act 2014, section 69		Local Authority, NHS	Legal Obligation
Personal Parental information		Point 3	Legal	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
Personal, characteristics, attendance, educational, parental contacts, home life, disabilities	For preventive or occupational medicine, or for reasons of public interest in the area of public health	NHS Medical staff Emergency services	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'	NHS Medical staff Emergency services	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		Twitter, Webanywhere (BLJS Website and APP), local press, internal use, Jane Stapleton photographers individual, class and group photos & the year book in year 6 Harris School Sports Partnership	Consent – image consent form

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
Personal		Educational visits companies (for specific pupils only)	Performing a public task
Personal		Warwickshire Safeguarding Board (for specific pupils only)	Performing a public task
Personal		LAC Warwickshire (for specific pupils only)	Performing a public task
Personal		Fostering agency (for specific pupils only)	Performing a public task
Personal		Nessy Learning (for specific pupils only)	Performing a public task
Personal, Parental contacts		Guy's Gift – Bereavement service (for specific pupils only)	Performing a public task
Personal, Medical, Educational, Parental contacts		Evolve (for specific pupils only)	Performing a public task
Personal		Skoolbo	Performing a public task
Personal		TT Rockstar	Performing a public task
Personal		Mathletics	Performing a public task
Personal		Accelerated Reading (Renaissance)	Performing a public task
Personal		Bug Club	Performing a public task
Personal, Educational Assessment		OTrack	Performing a public task
Personal		Dojo	Performing a public task
Personal		Harris Schools Sports Partnership	Performing a public task
Personal		GoBubble/ecadets	Performing a public task
Personal		FFT	Performing a public task
Personal Parental Contacts		SIMs Agora	Performing a public task
Personal		Teachers 2 Parents	Performing a public task
Personal Educational Parental		Capita (holds our pupil data in SIMs)	Performing a public task
Personal Educational Parental		We learn 365/One Drive (schools email system)	Performing a public task

