



1. Privacy Notice (How we use pupil information)

Why do we collect and use pupil information?

We collect and use pupil information under the General Data Protection Regulations 2018. Particularly under Article 6, where the information is collected and used because it is required by our school in order to carry out the task of educating and ensuring the welfare of our pupils and students.

We also collect and use pupil information in order to help pupils with additional special needs and requirements, so that we can ensure we offer the best possible support and resources to them (and their parents and carers) during their time in our school.

We use the 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 keep children safe (food allergies, or emergency contact details)
- to meet the statutory duties placed upon us for DfE data collections

The categories of pupil information that we collect, hold and share include:

- Personal information (such as name, unique pupil number and address)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Safeguarding information (such as court orders and professional involvement)
- Attendance information (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- Relevant medical information (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- Assessment and attainment information (such as Early Years Foundation Stage, Key Stage 1 and Key Stage 2 assessments, Year 1 phonics result and in-year attainment information measured against the National Curriculum)
- Special educational needs information
- Exclusions/behavioural information

We do not collect, hold or share biometric information for any systems in our school.

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 at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this.

Appendix A shows the lawful basis for collecting and using pupil information for each of our routine operations.



Storing pupil data

We hold pupil data for pupils until they leave our school and, in some cases where we are required by law to retain it for a longer period, up to your child's 25th birthday.

Appendix B describes the length of time we hold pupil data, and the form in which we hold it.

Who do we share pupil information with?

We routinely share pupil information with:

- schools that the pupil attends after leaving us
- the local authority
- the Department for Education (DfE)
- School Pupil Tracker Online
- Tucasi (school trip and online payment system)
- Tapestry assessment software for Foundation Stage pupils
- SIMS (school data management system)
- NHS

Why we share pupil information

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

We share pupils' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

We are required to share information about our pupils with the (DfE) under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

We share assessment and attendance information with School Pupil Tracker Online and, where relevant Tapestry, in order to process assessment and attendance information for internal use.

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>.

The National Pupil Database (NPD)

The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.



We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013, section 3.

To find out more about the pupil information we share with the department, for the purpose of data collections, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

The department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided pupil information, (and for which project), please visit the following website: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

To contact DfE: <https://www.gov.uk/contact-dfe>

2. Privacy Notice (How we use parent information)

Why do we collect and use parent information?

We collect information about parents of children on roll in order to promote each child's safety, to comply with various legislation, including Safeguarding legislation and to facilitate payments for items such as school lunches, educational visits and uniform purchases.

This includes information about adults who have a parent role for the child, whether legally defined or not (e.g. step-parents or adults living in the family home with agreed parenting roles)



The categories of parent information that we collect, hold and share include:

- Personal information (such as name, date of birth, phone numbers and address)
- Preferred language
- Safeguarding information (such as court orders)
- Finance information (collected and held by World Pay on our behalf for online payments, or information given on cheques through the school office)
- Benefits and National Insurance information (relating to Preschool payment entitlements only)
- Relevant employment information (such as employers' name, address, contact information and, where applicable, hours worked to enable swift contact)

We do not collect, hold or share biometric information for any systems in our school.

Collecting parent information

Whilst the majority of parent 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 at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this.

Appendix A shows the lawful basis for collecting and using parent information for each of our routine operations.

Storing parent data

We hold parent data for pupils until they leave our school and, in some cases where we are required by law to retain it for a longer period, up to your child's 25th birthday.

Appendix B describes the length of time we hold parent data, and the form in which we hold it.

Who do we share parent information with?

We routinely share pupil information with:

- schools that the pupil attends after leaving us
- the local authority
- the Department for Education (DfE)
- SIMS (school data management system)
- NHS

Why we share parent information

We do not share information about our parents with anyone without consent unless the law and our policies allow us to do so.

We share parent data with the Department for Education (DfE) and the Local Authority on a statutory basis.



3. Requesting access to your personal data

Under data protection legislation, 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 be given access to your child's educational record, contact in writing the Headteacher of Woolsery Primary School outlining your request. For children under the age of 16 years, requests must be made by a legal parent or guardian.

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
- a right to seek redress, either through the ICO, or through the courts

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/>

Contact:

If you would like to discuss anything in this privacy notice, please contact:

Woolsery Primary School Data Protection Officer
Tina Bryant
Woolsery Primary School
Woolsery
Bideford EX39 5QS

Email: tbryant@woolsery.devon.sch.uk
Telephone: 01237 431307

Woolsery Primary School Privacy Notice



Appendix A – The Lawful Basis for collecting, holding and processing pupil and parent data

Activity	Lawful Basis <i>(see below for definitions)</i>					
	(a)	(b)	(c)	(d)	(e)	(f)
Pupil Data						
Initial registration form (address, contact details, DOB, medical conditions etc)			✓			
Transition information (to receiving school after leaving Woolsery Primary)			✓			
Tapestry (Foundation Stage assessment tool)					✓	
School Pupil Tracker Online (assessment tracking)					✓	
Formative Assessment records					✓	
Special Education Needs information			✓			
School photographs	✓				✓ ¹	
Accident details					✓	
Safeguarding Records			✓			
School Census returns			✓			
Statutory Assessment returns			✓			
Annual Reports to Parents			✓			
Free School Meals eligibility					✓	
Early Years Pupil Premium eligibility					✓	
Attendance Information			✓			
G-Suite Google curriculum IT system					✓	
School Communications (SMS and email service)					✓	
Education Visit- related data (e.g. medical, additional contacts)	✓					
In-Class Onvu lesson observation cameras	✓					
Parent Data						
Parent names, addresses, contact information			✓			
Parent Finance Information	✓					
Safeguarding Information			✓			
Benefits and National Insurance Information	✓					
Employer Information	✓					



Notes:

1 – Individual photographs are collected for use in the school management systems so that children can be readily identified (SIMS)

Lawful Basis definitions:

- (a) **Consent:** the individual has given clear consent for Woolsery Primary School to process their personal data for a specific purpose
- (b) **Contract:** the processing is necessary for a contract Woolsery Primary School has with the individual, or because they have asked Woolsery Primary School to take specific steps before entering into a contract (*Not used by the school for pupil data*)
- (c) **Legal obligation:** the processing is necessary for Woolsery Primary School to comply with the law
- (d) **Vital interests:** the processing is necessary to protect someone's life
- (e) **Public task:** the processing is necessary for Woolsery Primary School to perform a task in the public interest or for Woolsery Primary School's official functions, and the task or function has a clear basis in law
- (f) **Legitimate interests:** the processing is necessary for Woolsery Primary School's legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests (This cannot apply to public authorities processing data to perform official tasks) (*Not used by the school for pupil data*)

Woolsery Primary School Privacy Notice



Appendix B – Storage Methods and Retention Periods for pupil and parent data

Activity	Form data is kept in	Retention Period
Pupil Data		
Initial registration form (address, contact details, DOB, medical conditions etc)	Paper, Digital encrypted file (Cloud)	Paper – Destroyed when child leaves the school Digital – Retained permanently (“SIMS Record”)
Transition information (to receiving school after leaving Woolsery Primary)	Common Transfer File	Used only for the purpose of transition (contents of “SIMS Record” file as detailed above retained permanently)
Tapestry (Foundation Stage assessment tool)	Digital encrypted file (Cloud)	Deleted when child leaves Foundation Stage
School Pupil Tracker Online (assessment tracking)	Digital encrypted file (Cloud)	Deleted when child reaches Year 7
Formative Assessment records	Paper, Cloud	Paper – Shredded as soon as no longer required (within each academic year) Cloud – Deleted when child leaves the school
Special Education Needs information	Paper, Cloud	Paper – Shredded when the child reaches 25 years* Cloud- Deleted when the child reaches 25 years* *30 years for EHCP cases
School photographs	Digital image	Digital imaged retained permanently as part of the SIMS record
Accident details	Cloud	Deleted when child reaches 25 years
Safeguarding Records	Paper	Shredded when child reaches 25 years
School Census returns	DfE Secure Access: Digital encrypted file	Used only for the purpose of Census (contents of “SIMS Record” file as detailed above retained permanently)
Statutory Assessment returns	DfE Secure Access: Digital encrypted file	Used only for the purpose of assessment return (contents of “SIMS Record” file as detailed above retained permanently)
Annual Reports to Parents	Digital encrypted file (Cloud)	Deleted when the child reaches Year 7
Early Years Pupil Premium eligibility	Paper	Deleted on statutory school entry
Admission Registers	Paper, Digital encrypted file	Date of last entry plus 6 years, then archived

Woolsery Primary School Privacy Notice



		Digital – Retained permanently (SIMS Record)
G-Suite Google curriculum IT system	Digital	Deleted (or at the request of the child, transferred to a personal Gmail account) when the child leaves the school
School Communications (SMS and email service)	Digital	Deleted when the child leaves the school
Education Visit- related data (e.g. medical, additional contacts)	Paper	Shredded at the conclusion of the trip (excluding trip-related accident forms which are stored in digital encrypted file for 25 years)
In-Class Onvu lesson observation cameras	Digital image	Deleted with 3 years of the recording
Parent Data		
Initial registration form (address, phone, DOB, etc)	Paper, Digital encrypted file (Cloud)	Paper – Destroyed when child leaves the school Digital – Retained permanently (“SIMS Record”)
Finance Information	Digital (World Pay for online transactions) Digital (School cheque payments – Tucasi) Paper	7 years
Safeguarding Information	Paper	Shredded when child reaches 25 years
Benefits and National Insurance information for preschool payment entitlements	Paper	7 years
Employer Information	Paper, Digital encrypted file (Cloud)	Paper – Destroyed when child leaves the school Digital – Retained permanently (“SIMS Record”)