



Privacy Notice for Parents and Pupils

<i>Review date</i>	December 2025
<i>Review period</i>	Annual
<i>Next Review date</i>	December 2026
<i>Policy type</i>	Legislative
<i>Other related policies</i>	Data Protection Policy Information Security Policy

Who are we?

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

The Griffin Primary School is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: [insert registration number].

You can contact the Academy Trust as the Data Controller in writing at:

The Griffin Primary School, Lower Lodge Avenue, Rugby, Warwickshire CV21 1NU or via email at admin2072@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, home address
- 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.

- 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.

We may also collect, use, store and share (when appropriate) information about your child that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- Any medical conditions we need to be aware of, including physical and mental health
- Photographs and CCTV images captured in school
- Characteristics, such as ethnic background or special educational needs

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 protect pupil welfare
- to comply with the law regarding data sharing
- to safeguard pupils
- to share medical information with health professionals
- to assess the quality of our services
- to provide a rewards structure
- to track how well the school is performing as a whole

Use of Yours or Your Child's Personal Data for Marketing Purposes

Where you have given us consent to do so, we may send you or your child marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to them. You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by contacting us (see 'Contact us' below).

Use of Your Child's Personal Data in Automated Decision-Making and Profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

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 UK 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.

Most of the data we collect in relation to parents and pupils will come direct from the parent or pupil. However, we may also hold data relating to you and/or your child that has come from:

- Local authorities
- Government departments or agencies
- Police force, courts, tribunals
- External support services

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 Academy Trust by law. We therefore are required to process personal information for such purposes even if you have not consented to us doing so.

If you would like a copy of or further information regarding the statutory authorities that underpin our legal obligations, you should contact The Griffin Primary 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.

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.

4) To perform a public task

It is a day-to-day function of The Griffin Primary 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

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

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

Who might we share your information with?

We routinely share pupil information with:

- Schools that the pupils attend after leaving us – statutory requirement
- Warwickshire Local Authority – for end of phase assessment information, to protect and support vulnerable pupils with eg SEND, PPG, CWSW, LAC/PLAC
- The Department for Education (DfE) – please see below.
- School nursing service & NHS – for routine checks and vaccinations
- Public Health and other public health agencies – to provide health and pastoral support
- Information Management software: SIMS, Synergy, Wonde – for daily operations re attendance and admissions
- Education/classroom apps: Class Dojo – providing information / rewarding children with Dojo points

- Parentpay – to operate financial services
- AIP Catering – to operate the catering services
- PS Financials – to manage payments relating to pupils
- Accelerated Reader – to access the English curriculum
- CPOMS – for safeguarding record keeping purposes

We occasionally share pupil information with:

- Multi Agency Safeguarding Hub MASH – to raise safeguarding concerns & advice
- Police (including Operation Encompass) – to comply with legal processes and for safeguarding

We do not share information about our pupils or parents unless the law and our policies allow us to do so.

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.

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-pupildatabase-user-guide-and-supporting-information>.

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 Griffin Primary 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).

We have security measures in place to prevent yours and your child's information from being accidentally lost, used, or accessed in an authorised way, altered, or disclosed.

How long do we keep your Information for?

In retaining personal information, The Griffin Primary School complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which The Griffin Primary 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 outside of the UK, we will do so with the appropriate safeguards in place 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 contact or 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.**

In certain circumstances where The Griffin Primary School processes data for the purposes of legitimate interests or to fulfil their public task, individuals have a right to object to the processing where it is likely to cause, or is causing, harm or distress. When exercising this right, individuals should contact the school/academy trust to inform them of their reasons for their objection. The school/academy trust will consider the reasons for any objection and assess the risk to the individual against the purposes for the processing. In the event the school/academy trust is unable to comply with an objection, we will ensure we can demonstrate compelling legitimate grounds to continue with the processing.

Where The Griffin Primary School processes your information with your consent, you have the right to withdraw your consent at any time. To exercise this right, please contact the The Griffin Primary School at admin2072@welearn365.com

You also have the right to:

- 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 annually.