



Privacy Notice for Parents and Pupils – How we use your information 2022/23

Who are we?

Galley Common Infant School is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Galley Common Infant School is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: Z7226377

You can contact the school as the Data Controller in writing at: Galley Common Infant School, Plough Hill Road, Nuneaton, Warwickshire, C10 9NZ or Admin2107@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.
- Information about a child's medical condition, including allergies, asthma, dietary requirements.

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 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)
- External agencies who provide support for children with Special Educational Needs.
- COMPASS – health and welfare needs

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 by **the 25th May 2023**.

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

Information Type	Relevant legislation	Third Parties with whom we share the information	Lawful reason for sharing
Name	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH, Call Parents, School Photographer, Bug Club (Pearson Education)	Necessary to Comply with a statutory or other legal obligation
UPN	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation
Admission Number	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH, school photographer	Necessary to Comply with a statutory or other legal obligation
Gender	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation
Date of Birth	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation
Home telephone number	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation
Address	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation

Name of siblings	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation
Name of previous school/Nursery	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation
Parents/Carers Name	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation
Parent/Carers contact telephone number	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation
Parent Carers email address	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation
Family Faith	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation
Child's first language	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation
Language spoken at home	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation
Mode of travel to school	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation

Birth certificate	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation
Parental responsibility	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation
Attendance register	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation
Absence letters from parents	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation
Medical forms for administering medication	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation
First Aid log - name (initials)	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation
Intervention book (initials)	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation
Late log slip - name, date, time, reason and parent/carers signature	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's	Necessary to Comply with a statutory or other legal obligation

		Services, Compass, STS, MASH,	
Children leaving early slip - name, date, time, reason and parent/carers signature	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation

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

Information Type	Third Parties with whom we share the information	Lawful reason for sharing
Child's medical information e.g. allergies	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Consent has been given
Accessibility requirements	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary for the performance of a contract to which the data subject is a party
SEN Status	SIMS, DfE, SEND Assessment and Planning Team, SEN Finance, Staff, EPS, Child's new school, Children's services, Compass STS, MASH SALT	Necessary for the performance of a contract to which the data subject is a party
Current Needs	SIMS, DfE, SEND Assessment and Planning Team, SEN Finance, Staff, EPS, Child's new school, Children's services, Compass STS, MASH, SALT	Necessary for the performance of a contract to which the data subject is a party
Linked Agencies	SIMS, DfE, SEND Assessment and Planning Team, SEN Finance, Staff, EPS, Child's new school, Children's services, Compass STS, MASH, SALT	Necessary for the performance of a contract to which the data subject is a party
Reports from Agencies eg, EP, STS	SIMS, DfE, SEND Assessment and Planning Team, SEN Finance, Staff, EPS, Child's new school, Children's services, Compass STS, MASH, SALT	Legal Obligation
Child protection referral form	Staff, EPS, Child's new school, Children's services, Compass STS, MASH, SALT	Necessary to protect the vital interests of the data subject or another person
Early Help referral form	Staff, EPS, Child's new school, Children's services, Compass STS, MASH, SALT	Necessary to protect the vital interests of the data subject or another person
Concern forms	Staff, EPS, Child's new school, Children's services, Compass STS, MASH, SALT	Necessary to protect the vital interests of the data subject or another person

Early help meeting minutes	Staff, EPS, Child's new school, Children's services, Compass STS, MASH, SALT	Necessary to protect the vital interests of the data subject or another person
Child protection conference minutes	Staff, EPS, Child's new school, Children's services, Compass STS, MASH, SALT	Necessary to protect the vital interests of the data subject or another person
Child in Need	Staff, EPS, Child's new school, Children's services, Compass STS, MASH, SALT	Necessary to protect the vital interests of the data subject or another person
Child Protection Meeting Minutes	Staff, EPS, Child's new school, Children's services, Compass STS, MASH, SALT	Necessary to protect the vital interests of the data subject or another person
Pastoral support programmes	Staff, EPS, Child's new school, Children's services, Compass STS, MASH, SALT, parents	Necessary to protect the vital interests of the data subject or another person
Positive intervention plans	Staff, EPS, Child's new school, Children's services, Compass STS, MASH, SALT, parents	Necessary to protect the vital interests of the data subject or another person
Person centered plans	Staff, EPS, Child's new school, Children's services, Compass STS, MASH, SALT, parents	Necessary to protect the vital interests of the data subject or another person
Copies of child protection forms	Staff, EPS, Child's new school, Children's services, Compass STS, MASH, SALT	Necessary to protect the vital interests of the data subject or another person
Information on complaints	Staff, EPS, Child's new school, Children's services, Compass STS, MASH, SALT, Governor Complaint panel	Necessary to protect the vital interests of the data subject or another person
Meetings with parents file	Staff, EPS, Child's new school, Children's services, Compass STS, MASH, SALT	Necessary to protect the vital interests of the data subject or another person
Behaviour book	Staff, EPS, Child's new school, Children's services, Compass STS, MASH, SALT	Necessary to protect the vital interests of the data subject or another person
Child Protection concern list including name, year group, class, submitters name, submitters job title,	Staff, EPS, Child's new school, Children's services, Compass STS, MASH, SALT	Legal Obligation

date, day, event, outcome, designation and type		
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Table 3 - Personal information we are required to process with the consent of the individual to whom that information 'belongs'

Information Type	Third Parties with whom we share the information	Lawful reason for sharing
Emergency contact name	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Consent has been given
Emergency contact phone number	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Consent has been given
Emergency contact relationship to child	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Consent has been given
Consent for hospital treatment in the event of an emergency	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Consent has been given
Acceptable Use agreement - child	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Consent has been given
Acceptable Use agreement - parent/carer	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Consent has been given
Use of digital/video images permission	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Consent has been given
Consent form for photography and images for children	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Consent has been given
Tapestry online consent form	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Consent has been given
Permission for offsite activities	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Consent has been given
Permission for food tasting	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Consent has been given
Permission for photographs taken by other adults	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Consent has been given
Permission for transport by coach	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Consent has been given
Permission for child to use safeguarded internet sites in school	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Consent has been given
Permission to have head checked for headlice	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Consent has been given
Home school agreement - signed by school, parent/carer and child	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Consent has been given
Permission for child to use safeguarded internet sites in school	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation, Necessary to protect the vital interests of the data subject or another person

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
Supply teacher information - supplied by administrator - medical issues, behaviour, dismissing procedures, playground duty		SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary for the performance of a contract to which the data subject is a party
Children's first names – display, books, worksheets etc		SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary for the performance of a contract to which the data subject is a party
Classroom organisation - drawers, coat pegs, books, certificates, drinks list, target cards - first name		SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary for the performance of a contract to which the data subject is a party
Planning, group lists, targets - Initials		SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary for the performance of a contract to which the data subject is a party
Moderation documentation		SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary for the performance of a contract to which the data subject is a party
Tracking data		SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary for the performance of a contract to which the data subject is a party
Results of Covid-19 Testing	Necessary for reasons of public health	Public Health and other public health agencies	Public Task

Ethnic origin	Necessary to Comply with a statutory or other legal obligation	SIMS, Staff, EPS, Child's new school, Children's Services, Compass, STS, MASH,	Necessary to Comply with a statutory or other legal obligation
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Table 5 - Personal information we process because we have a legitimate interest, please note that the right to object will apply to some of this processing, please see the section above that refers to 'What are your rights with respect of your personal information?'

Information Type	Special Category- additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Images captured on our CCTV system	N/A	This is not shared routinely	N/A