

PAWLETT PRIMARY SCHOOL ACADEMY

Privacy Notice for Parents and Pupils

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About this Privacy Notice

Pawlett Primary School Academy is part of The Priory Learning Trust MAT and is covered by The Priory Learning Trust's Data Protection Policy.

Individuals have a legal right to be informed about how we use their personal information. This Privacy Notice explains how we collect, store and use personal information. It is intended for pupils and parents (including carers or guardians who we refer to in this privacy notice as 'parents') and we encourage all to read it. We also hold a separate Privacy Notice for the school's workforce and a shorter, simpler notice for pupils themselves.

Our aim is to always provide clear information about the personal information we are using and why we are using it. We have tried to keep the language in this Privacy Notice as simple as possible, however if anything is unclear or if you have any concerns, please contact info@theplt.org.uk

This is the school's main 'overarching' Privacy Notice and it applies generally to the personal information that we collect and use. Unless there is a lawful reason not to do so, we will also provide more specific privacy information at the point at which we collect or use personal information, for example if we collect personal data via an online or paper form.

Whilst much of the personal information that we collect is mandatory (ie it must be provided so that we can manage the school, fulfil our legal obligations and provide an education), some of it is requested on a voluntary basis. We will explain to you whether there is a requirement to provide certain information to us, or whether you have a choice in doing so. Where this is the case, we will request consent at the point we collect the information.

For the purposes of data protection law, The Priory Learning Trust is the 'Data Controller'. Our Data Protection Officer is One West; contact details are provided at the end of this privacy notice.

The personal data we hold (categories of personal data)

We process personal information to be able to run the school, to provide pupils with an education and to make sure that we can look after our pupils appropriately. We may collect information directly from pupils or parents or from other places including other schools, the local council and the Department for Education (DfE). Examples of the types of personal data that we may collect, use, store and share (when appropriate) are listed at Appendix 1.

Our lawful reasons for processing pupil/parent information (lawful bases)

Data Protection law requires us to have a legal reason ("Lawful Basis") for processing the personal data we use. These reasons are listed under Article 6 of the 'UK General Data Protection Regulation' (UK GDPR). Our lawful basis for processing will be explained at the point at which we collect personal information unless there is a lawful reason not to do so (for example where it is for the prevention or detection of crime).

Pawlett Primary School Academy processes a wide range of personal data for a variety of purposes, as described above. The lawful bases we rely on will therefore vary. However, generally, the lawful bases we mainly use in relation to pupils and parents are:

- **We need to comply with the law (we have a legal obligation):** for example we collect and use pupil information under legal and statutory obligations within the Education Act 1996, The Children Act 2004; Education and Inspections Act 2006; Education Act 2011; the Family and Children Act 2014 and Keeping Children Safe in Education (KCSIE).

- **We need to carry out a task in the public interest:** for example, the collection and use of pupil information is necessary for us to perform our role as a school and to deliver our public task of providing education to our pupils.
- **You have given us your consent** for example a photo of you for promotional purposes or our website.
- **We need to protect your vital interests (or someone else's interests)** this relates to life-or-death situations.
- **It is in ours or a third party's legitimate business interests to process the data** where this is the case, we will ensure that we have considered whether our legitimate interests are overridden by your rights and freedoms as the pupil or parent.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so. We will then cease this aspect of processing.

When a pupil is considered mentality capable of making their own decisions with regards consent (while there is no defined age, this is normally considered once a child attends Secondary school), their consent choices over-ride those made by the parent or guardian.

Some of the reasons that we use for collecting and using information may overlap and there may be several grounds allowing us to use personal data. There are also other lawful bases that may apply, and this will be made clear wherever possible.

Our lawful basis for processing will be explained at the point at which we collect personal information unless there is a lawful reason not to do so (for example where it is for the prevention or detection of crime).

Special category (sensitive) personal information

We may also collect, store, and use information about you that falls into "special categories" of more sensitive personal data which has extra protection in law and requires us to identify a condition for processing under Article 9 of the UK GDPR.

Special category data is personal data revealing:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric data for the purpose of uniquely identifying a natural person (for example fingerprints)
- data concerning health; or
- data concerning a natural person's sex life or sexual orientation

The Article 9 grounds which we may rely on to process special category data include:

- Legal obligation
- Substantial public interest including:
 - Statutory and government purposes

- Equality of opportunity or treatment
 - Preventing and detecting unlawful acts
 - Preventing fraud
 - Public Health
 - Safeguarding
- Support for individuals with a particular disability or medical condition
 - Explicit consent, for example to the use of biometric data, eg fingerprints.
 - To maintain your vital interests

Further details about how the school complies with data protection legislation with regards the processing of Special Category data can be found in the Special Categories of Data section of the school's Data Protection Policy.

Criminal convictions

We may process data about criminal convictions or offences. This will usually be where such processing is necessary to carry out our obligations, to exercise our rights, to look after our students and staff or to support the police and other relevant agencies.

We will only use information about criminal convictions or offences where the law allows us to. Usually this will either be either on the basis of our legal obligations in relation to safeguarding, preventing fraud, health and safety or with your consent. We also need to identify the relevant condition for the processing, this will usually be substantial public interest.

Collecting pupil and parent information

The reasons that we collect and use personal information enable us to provide our pupils with an education and to help us run the school. Please refer to **Appendix 1** for examples.

We collect and use information about you in a variety of way including through the school application and admissions process, from correspondence with you and through assessing pupils' educational progress. The ways in which we collect information about you may also include methods as outlined in **Appendix 1**.

We may also collect information about you from third parties such as information from other schools or other third parties engaging with you outside the school.

Whom we share pupil information with

Information about pupils and parents will not be shared with any third party without consent, unless the law allows us to do so. Where it is legally required or necessary (and it complies with data protection law), personal information may be shared with the relevant local authority to meet our legal obligations to share information such as safeguarding concerns, or we are legally obligated to share certain data with the Department for Education (DfE). To find out more about the data collection requirements that are placed upon us by the DfE including the data that we share with them go to: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>. We do not use data for profiling, and only for marketing if you have opted in, eg to our newsletter or other communications via the Weduc app.

If you leave us and move to an alternative school, we are legally obligated to transfer your child's Education Record and all Safeguarding files onto the new school, to ensure their education and any

additional support is in no way compromised by the move.

In the course of investigations, complaints or incidents (such as safeguarding incidents), we may need to disclose information to third parties in order to establish the facts of a case, explain our decisions and ensure transparency in our processes.

Further examples of with whom we share data are listed at **Appendix 2**. Details of how we share data with the Department for Education can be seen in **Appendix 3**.

Third-Party Processors

There are occasions when we contract or commission third party organisations or software systems to carry out functions on our behalf, and inevitably these functions will involve those third parties processing personal data on our behalf. Details of the Third-Party Processors we use, including what data is processed and why can be found at **Appendix 4**.

Third-Party Processors are acting on our behalf, and under our instruction are governed by a contract that meets the requirements defined by GDPR.

Storing pupil and parent data

Personal data is stored in line with our data protection policy in a range of different places, including within pupils' files and our IT systems, and the school's email system.

The information that we create and maintain is kept secure. Once a pupil's education with us has ended, we may retain such information beyond their attendance at the school as deemed necessary and in line with our retention policies. A copy of the Retention Schedule can be obtained by contacting info@theplt.org.uk

Transferring data internationally

Where we transfer personal data to a country or territory outside the UK and European Economic Area, we will do so in accordance with data protection law and ensure that we have sufficient safeguards in place.

Requesting access to your personal data

Individuals have the right to request access to information about them that we hold. This is known as making a 'Subject Access Request' (SAR). If you make a subject access request and we hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form within a month, unless an extension is necessary on the ground of the complexity of the request

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances. If you would like to make a request, please contact info@theplt.org.uk

Children have the same rights as adults over their personal data and the school will assess each request on its own merits. Pupils can find out what personal information we hold about them and how we use it by making a subject access request, as long we judge that they can properly understand their rights and what this means.

Those with parental responsibility can make a request with respect to their child's data, where the child is not considered mature enough to understand their rights over their own data (mental capacity will be judged by the school on a case-by-case basis), or where the child has provided consent and it is considered to be in the best interests of the child. Parents also have the right to make a subject access request with respect to the personal data the school holds about themselves. If you would like to make such a request, please contact info@theplt.org.uk

There is no equivalent legal right to access a child's educational record. It will be up to the school to decide whether to grant such access, and it is likely to depend on the contractual relationship between the parent and the school.

Other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Request to have personal data corrected if you believe that it is inaccurate or incomplete.
- Request the deletion or removal of personal data where there is no compelling reason for its continued processing.
- Restrict our processing of personal data (ie permitting its storage but no further processing) under certain circumstances.
- Object to processing if we are processing your information as part of our public tasks, or on the basis of our legitimate business interests, in which case we will consider your objection, and balance this against our need to process the information.
- Object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics.
- Withdraw your consent to processing.
- Have personal information, which you have provided, transmitted electronically to another organisation in certain circumstances.
- Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect, unless you have agreed or in other limited circumstances.
- Seek redress, either through the ICO, or through the courts.

Contact and Complaints

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please either contact the data protection lead via info@theplt.org.uk or 01934 510777.

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please contact info@theplt.org.uk or our Data Protection Officer One West: i-west@bathnes.gov.uk or 01225 395959.

You can also complain to the Information Commissioner's Office if you are unhappy with how we have used your data, but they would generally expect you to have raised the issue with us first:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Updates to our Privacy Notice

We may need to update this Privacy notice periodically. This version was last updated on 23 January 2024.

Version	Date	Summary of changes	Author
V1.0	July 2020	Initial version	One West
V1.1	Dec 2021	Addition of Appendix 6	One West
V1.2	Aug 2023	Merging of Appendices 1, 2 and 3, PN title change and minor grammatical updates	One West
V1.3	Oct 2023	Formatting	One West

Appendix 1: Non-exhaustive list of the types of personal data we process

Data type	Purpose	Where we obtain the data from
Personal identifiers and contacts (such as name, unique pupil number, contact details and address).	For written, verbal or face to face communication with parents/carers.	School Application data from the local authority. Direct from parents/carers. CTF files from previous schools.
Characteristics (such as ethnicity, language, and free school meal eligibility).	To meet the statutory duties placed upon us eg for official data collections.	Direct from parents/carers. Local authority – free school meals.
Safeguarding information (such as court orders and professional involvement).	To look after pupil wellbeing. To keep children safe. For use by Safeguarding leads in school.	Confidential, encrypted emails from the local authority and other relevant agencies.
Special educational needs (including the needs and ranking).	To support pupil learning and for use by the schools Special Educational Needs Coordinator (SENCO).	Confidential, encrypted emails from the local authority and other relevant agencies.
Medical conditions (such as doctor information, child health, dental health, allergies, medication and dietary requirements).	To keep children safe (eg food allergies) and to look after pupils wellbeing.	Direct from parents/carers. Confidential, encrypted emails from the local authority and other relevant agencies eg NHS services, providers and GPs.
Attendance record (such as sessions attended, number of absences, absence reasons and any previous schools attended).	To meet the statutory duties placed upon us eg for official data collections. To look after pupil wellbeing.	CTF files from previous schools. Created in school by staff whilst taking registers. Absence reasons direct from parent/carers.
Test results, assessment and attainment (such as key stage 3 and 4 results, post 16 courses enrolled for and any relevant results etc.).	To monitor and report on pupil progress and check whether any extra help is needed. To keep track of how well we are performing and assess the quality of our services.	CTF files from previous schools. Examination Board. Created in school by staff monitoring exam results.
Behavioural information (such as exclusions and any relevant alternative provision put in place).	To monitor and report on pupil progress and check whether any extra help is needed. To support pupil learning. To keep children safe.	Created in school by staff.

Photographs and CCTV	To identify individual students. To investigate incidents and/or complaints.	Created in school by staff. CCTV system.
Biometric data (such as fingerprints)	To manage payments for school meals.	Direct from students.
We may use online platforms to deliver lessons remotely; if we intend to record the lesson we will let you know	To support pupil learning and deliver remote learning.	The Google platform which is encrypted and 'cloud' based.

Where we form part of a Multi-Academy Trust, The Priory Learning Trust are the Data Controller for this information, and do, therefore, have access to all personal data the school processes. As in all cases, this access is restricted to only those with a requirement to see it, for example IT support, or to act as an independent investigator in accordance with our Complaints Policy.

Appendix 2: Examples of whom we may share your data with where the law permits (non – exhaustive list)

- The Local Authority (Somerset Council).
- Schools that students attend after leaving Pawlett Primary School Academy.
- The Department for Education (DfE).
- The National Health Service to support student safety and vaccination programs.
- The pupil's family and representatives.
- Educators and examining bodies.
- The schools' inspector
- Suppliers and service providers so that they can provide a contracted service such as careers and Physical Education provision.
- Central and local government.
- Auditors.
- Survey and research organisations.
- Security organisations.
- Health and social welfare organisations.
- Professional advisers and consultants.
- Counsellors/Educational Psychologists as and when appropriate.
- Charities and voluntary organisations.
- Police forces, courts, tribunals.
- Professional bodies.
- Our Data Protection Officer on occasion, eg to support a subject access request
- Occasionally with school governors

We may be required to share information about our pupils with the local authority to ensure that they can conduct their statutory duties under the Schools Admission Code, including conducting Fair Access Panels.

Appendix 3: How we share information with the Department for Education (DfE) and the National Pupil Database (NPD)

Pawlett Primary School Academy is required to provide information about pupils to the DfE as part of statutory data collections such as the school census. Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the DfE and provides evidence on school performance to inform research. The database is held electronically so it can be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The DfE may share information from the NPD with other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

Sharing by the DfE:

The law allows the DfE to share pupils' personal data with certain third parties, including:

- Schools and local authorities.
- Researchers.
- Organisations connected with promoting the education or wellbeing of children in England other government departments and agencies.
- Organisations fighting or identifying crime.

We lawfully share pupil data with the DfE through data collections which is used to

- underpin school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- inform 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).
- support 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

For more information about the DfE's NPD data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data> To find out more about the data collection requirements placed on us by the DfE via the school census please visit:

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>

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

If you want to see the personal data held about you by the DfE, you can make a 'subject access request' to the DfE. Further information on how to do this can be found within the DfE's personal information charter that is published here: <https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

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

Appendix 4: Third Party Processors we use

Third Party Processor	Personal data captured	Purpose	Country the data is processed in	Who the information may be shared with and why
4 Matrix	Student name, class, year, reg group, gender, UPN, DOB, ethnicity, admission date, SEND, attendance, FSM, PP	Secondary assessment tracking system.	European Economic Area	The pupil's family, as evidence of academic progress. School staff to monitor progress/performance.
Accelerated Reader (Hosted by Renaissance Learning)	Student name, DOB, English class.	Reading programme used to track students' progress in reading related to their chronological age.	US	The pupil's family, as evidence of academic progress. School staff to monitor progress/performance.
The Brilliant Club	Student name, DOB, postcode, pupil premium	Raising student aspirations.	Outside the European Area	School staff to monitor progress/performance.
ESS SIMS	All student and staff data	Maintenance of main MIS system for students and staff. Data only visible during known maintenance periods.	UK	School staff to provide students with an education.
Class Charts	Student name, year group, tutor group, UPN number, subject class, SEN, pupil premium, DOB, ethnicity	To provide seating plans for teaching staff, recording of conduct data.	Outside the European Area	School staff to provide students with an education.
Classroom Monitor	Student name, DOB, gender, FSM status, class, SEN status	Progress Tracking System.	Outside the European Area	School staff to monitor progress/performance.

CRB Cunninghams	Student name, admission number, tutor group, gender, DOB, Year, Free school meal information, photograph, ethnicity, UPN. Biometric scan of finger/thumb taken once parental permission is received (no fingerprint is identifiable from this information) Staff name, gender, DOB	Provision of school meals service, including biometric payment system. Provision of free school meals to appropriate students.	Canada US Australia New Zealand	School staff to provide free school meals.
Doddle	Student name, year group, class data, Parent user name, parent email, staff name, staff work email	Homework/resources website.	UK US	Parent/carers to provide remote learning.
Elklan Training Ltd	Student name, academic information, photograph.	Speech & Language Trainers – teacher training.	UK Ireland	The pupil's family, as evidence of academic progress.
Exampro (Doublestruck Ltd)	Student name, UPON, admission number, gender, DOB, year group, reg group, teacher name, class name, supervisor name, ethnicity, free school meal eligibility, SEN status, In Care status. Teacher name, job title, email, telephone.	GCSE data analysis tool for AQA exam boards.	UK European Area	School staff to monitor progress/performance.
Focus on Sound	Student name, username, hidden password (all created by student), test scores	Online music revision tool.	UK	School staff to monitor progress/performance.

Fusion 360	Student name, DOB, email	Computer Design Software.	UK US Outside the European Area	School staff to provide students with an education.
GCSEPod	Student name, Unique Pupil Number, student e-mail address, DOB, gender, year group, group name, subject name, teacher. Staff name, work e-mail address, date of leaving, role, staff code.	GCSE revision website. By sharing data, the Academy is able to track how often students are accessing the revision materials and which topics are being studied.	US Canada Republic of Ireland	School staff to monitor progress/performance.
Hegarty Maths	Student name, class, group, year, gender, UPN, DOB, leaving date. Staff name, email address	Online maths teaching and learning tool.	European Economic Area	School staff to monitor progress/performance.
ICR Support for Schools	Access to student name, staff name, correspondence	ICT Network support.	Germany	School staff to provide students with an education.
Insight	Student name, class, year, gender, UPN, DOB, ethnicity, admission date, SEND, attendance, FSM, PP Staff work email address	Primary assessment tracking system.	UK	School staff to monitor progress/performance.
Mathletics	Student name, class, teacher's name	Primary online maths system.	US Europe Australia	School staff to provide students with an education.

My Maths	Student name, maths class	Maths revision site.	Outside the European Economic Area	School staff to provide students with an education.
No More Marking	Student name, DOB, gender, year group, English class, pupil premium status, EAL	English assessment tool.	Ireland	School staff to monitor progress/performance.
Aspens Catering Services	Student name, admission number, tutor group, gender, DOB, Year, Free school meal information, photograph, ethnicity, UPN. Biometric scan of finger/thumb taken once parental permission is received (no fingerprint is identifiable from this information) Staff name, gender, DOB	Provision of school meals service, including biometric payment system. Provision of free school meals to appropriate students.	UK	School staff to provide free school meals.
Parentpay	Student name, DOB, Gender, school admission number, Unique Pupil Number, tutor group, year group, parent name, address, telephone number, meal arrangements, eligibility for free school meals, ethnicity, religion, dietary needs, meal pattern Payments secured by Payment Card Industry Data Security Standard (PCIDSS)	To facilitate payments into school for trips, events and other purchases.	UK European Area	Parents/carers to be able to make payments for school events/meals.

PiXL English/Maths App	Student name, year group, English class, maths class. Students will be asked to enter an e-mail address when they first register for password reminders. Use of school e-mail address will be recommended.	English and maths revision and practice questions.	UK European Economic Area	School staff to monitor progress/performance.
Provision Map – via Edukey	Student name, DOB, SEN Status, Ethnicity, EAL, Gender, FSM, LAC, PP, attendance, assessment results, photo, timetable. Staff name, email, role	SEND tracking system.	Outside European Economic Area	School staff to support special education needs or any extra help required.
PS Connect/Contact Group (Truancy Call/Parent Call)	Student name, DOB, gender, school admission number, tutor group, ethnicity, religion, parent(s) name(s), parent(s) phone number(s), parent(s) e-mail address(es)	Truancy Call is our absence call line for automated calls to parents if students not in school. Parent Call is used for reminders about parents evenings, Books4U and can be used in emergencies such as school closures.	France	Parents/Carers to support and keep children safe.
Quick Key	Student name, class, ID number	Marking of diagnostic assessments at KS3.	Outside European Economic Area	School staff to monitor progress/performance.
Rising Stars & Mark System	Student name, gender, DOB, class, test results	Primary assessment data (PIRA/PUMA).	UK	School staff to monitor progress/performance.
Scomis	All student and staff data	Hosting of primary school SIMS system.	UK	School staff to provide students with an education.

SISRA	Student name, exam number, tutor group, gender, ethnicity, SEN, FSM, LAC, pupil premium, attendance, assessment records	Online data analysis tool (secondary).		School staff to monitor progress/performance.
SNAP	Student name, DOB, class, teacher's name, life event details, behavior information	Assessing the SEND needs for children.	UK	School staff to support any additional needs.
Tapestry	Student name, DOB, gender	EYFS online learning diary.	US Germany	School staff to monitor progress/performance.
Tassomai	Student name, email. Staff name, email	Science subject support.	UK Outside the European Economic Area	School staff to monitor progress/performance.