GENERAL PRIVACY NOTICE

What is this notice?

Willaston Church of England Primary School collect and use **personal data** about pupils, parents, staff, visitors and guests. This summary privacy notice provides a general explanation of how and why we collect and use personal data, who we share it with and why and how long we keep it.

For more details as to the data we use in certain circumstance, we provide more detailed Privacy Notices for specific areas, these include:

- School Trips
- Use of Photographs

Throughout this notice you'll see a lot of specific data protection terms (which you can recognise because they're in **Bold**). Where possible, we've tried to define them as we go, but we thought it might be useful to have a brief explanation as to some of the terms we use. Anywhere in this notice you see the following terms, they'll have the following meanings:

- **Data Controller or Controller** is a legal term set out in the General Data Protection Regulation (**UKGDPR**), it means the party responsible for deciding what Personal Data to collect and how to use it;
- **Data Processor** is another legal term set out in the UKGDPR, it means the party who has agreed to process Personal Data on behalf of the Controller.
- **Data processing** is a collecting, using, sharing or storing data.
- **Data Protection Officer/DPO** – a member of staff who is responsible for ensuring the school complies with data protection legislation, you can also raise any complaints or issues direct to our **DPO**;
- **Data Subject** means the individual who can be identified from the Personal Data;
- **Personal Data** means data which can be used to identify a living individual. This could be a name and address or it could be a number of details which when taken together make it possible to work out who the information is about. It also includes information about the identifiable individual;
- **Special Categories Data** means details about an individual's race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about health and genetic and biometric data.

Who is the Data Controller for the processing of my personal data?

Willaston Church of England Primary School is the **Data Controller** for any of the **personal data processed** – so data that is collected, stored or otherwise used - by the school. This means we are responsible for making decisions about what data we collect, how we use it who we share it with and how long we keep it.

What personal data do you process and why?

We process a range of personal data about the following groups of people or **Data Subjects**.
The data we hold, the reason we use that data and how long we keep it for is covered later in this notice:

Data Subjects	Description	Reason
Pupils	We hold personal data on pupils while they attend the school. We also hold limited data on prospective pupils as well as on former pupils where we are required to do so by law. We will also hold special category data on some pupils where this is necessary and appropriate. 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, free school meal eligibility and a standard headshot photographic image) • Attendance information (such as sessions attended, number of absences and absence reasons) • Assessment information (such as Key Stage 1 and 2 scores, internal and external examination results) • Medical information (such as allergies and existing medical conditions) • Special Educational Needs information (such as results of testing and support strategies) • Exclusions and Behaviour information (such as details of rewards, sanctions, detentions, suspensions) • Post-16 destinations (education, employment, training) • Destinations of those students who leave before the normal leaving age, or mid-year	The School collects and processes personal data (including special category data) about pupils and parents for a range of purposes linked to our responsibility to educate and develop young people. These are: - • For the purposes of pupil admission (and to confirm the identity of prospective pupils and their parents); • To provide education services and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs; • To derive statistics which inform decisions related to the funding of schools and the management of our budget; • To assess performance and to set targets for schools; • To safeguard pupils' welfare and provide appropriate pastoral (and where necessary medical) care; • To give and receive information and references about past, current and prospective pupils, and to provide references to potential employers of past pupils; • In order to manage internal policy and procedure; • To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other

Parents	We hold personal data on parents of pupils who currently attend the school and also hold limited data on prospective pupil's parents as well as on former pupil's parents where we are required to do so by law. This includes, name, address, and contact details. We will also hold special category data on some parents where this is necessary and appropriate.	achievements of pupils of the school; • For the purposes of management planning and forecasting, research and statistical analysis, including those imposed or provided for by law (such as diversity analysis); • For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care; • To enable relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate (for example Ofsted); • To monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's IT security policy; • To make use of photographic images of pupils in school publications, on the school website and (where appropriate) on the school's social media channels; • To allow pupils to take part in appropriate school trips, visits and other school organised events; • To provide appropriate pastoral care; • To comply with our responsibilities for the prevention and detection of crime • For security purposes, including CCTV in accordance with the school's CCTV policy; and • Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional

		advice and insurance for the school.
Staff and Governors	We hold personal data on current and former members of staff in line with employment requirements. We will also hold special category data on some staff where this is necessary and appropriate.	The School collects and processes personal data about employees and job applicants for the following purposes: - • To determine recruitment and selection decisions on prospective employees; • In order to carry out effective performance of the employees contract of employment and to maintain employment records; • To comply with regulatory requirements and good employment practice; • To carry out vetting and screening of applicants and current staff in accordance with regulatory and legislative requirements; • Enable the development of a comprehensive picture of the workforce and how it is deployed and managed; • To enable management and planning of the workforce, including accounting and auditing; • Personnel management including retention, sickness and attendance; • Performance reviews, managing performance and determining performance requirements; • In order to manage internal policy and procedure; • Human resources administration including pensions, payroll and benefits; • To determine qualifications for a particular job or task, including decisions about promotions;

		• Evidence for possible disciplinary or grievance processes; • Complying with legal obligations; • To monitor and manage staff access to our systems and facilities in order to protect our networks, the personal data of our employees and for the purposes of safeguarding; • Network and information security, including preventing unauthorised access to our computer network and communications systems and preventing malicious software distribution; • Education, training and development activities; • To monitor compliance with equal opportunities legislation; • Determinations about continued employment or engagement; • Arrangements for the termination of the working relationship; • Dealing with post-termination arrangements; • Health and safety obligations; and • Fraud.
Visitors/Others	We hold personal data on visitors, guests, contractors and other individuals who may visit the school or have reason to be on school property. We will also hold special category data on some visitors if they share that information as necessary to aid their visit to us.	We have a responsibility to safeguard or staff and students and one of the ways we do this is to understand who is on school premises and for what purpose at any given time In order to gain access to school premises, even when chaperoned, we require you to provide this information.

Where do you collect personal data from?

We collect personal data in a variety of ways and this will depend on your relationship with the school, but the majority of data you provide to us. Some examples of the type of data we collect are:

Pupils, Parents and Guardians

Source	Types of Data Collected	How do we collect it?
Direct from the data subject From admission forms and other data provided when pupils join the school Information provided direct from parents/guardians	This is information such as: • Name, pupil number, date of birth, gender and contact information; • Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses; • Details of gender, age, nationality, ethnic group, religion, free school meal eligibility As well as details of any sickness absence a pupil may have had, parents and pupils may have also provide us with details of any illness or condition they may have or medication they are required to take.	Most of this information will have been provided when pupils join the school and kept up-to-date by the contact detail forms sent home to parents each year. Information may also be provided by parents or guardians at any point during a child's time with the school. In terms of medical information, in the majority of cases, they have provided this information voluntarily so that we are aware of how we can offer any assistance
Information collected as pupils progress through the school	We collect and use information relating to studies and behaviour. Some of this information we collect is so that we can understand how pupils are performing and some of it we are required to report to the Local Authority or the government so they know such things as how many pupils we have. This information includes: • Attendance details (such as sessions attended, number of absences and reasons for absence); • Performance and assessment information; • Behavioural information (including exclusions); • Special educational needs information.	This information is collected as pupil's progress through their time with the school and is based on their attendance, performance and development. Information is collected from a variety of day to day sources such as class registers, test results, reports and assessments.
Information collected from the use of school equipment	We monitor access to websites and school ICT equipment to ensure staff and pupils comply with our usage policy.	Monitoring of access to websites and the use of the school network etc. is automatic.
Photographs and CCTV	As the school operates CCTV cameras, pupils will regularly be captured by them during the day and as they move around the school. Any visitors to the school will also be captured on CCTV. We also capture images of pupils engaging in school activities, but we will ask for parental consent to ensure parents are happy for photos of pupils to be used and under what conditions.	CCTV is automatically captured on school property on daily basis. Where photographs of pupils are taken, parents are informed and consent is sought for their use.

By visiting the school website	We collect traffic and usage data as well as some technical data from visitors to the school website.	Collection of information relating to visits or use of the school website is dependent on acceptance of specific cookies.

Staff and Governors

Source	Types of Data Collected	How do we collect it?
Direct from the data subject. This could be via a job application form or as part of ongoing job appraisals.	This is information such as : • Name, title, addresses, date of birth, marital status, phone numbers and personal email addresses; • Emergency contact information such as names, relationship, phone numbers and email addresses; • Details of any dependants; • Details of characteristics such as: gender, age, nationality, ethnic group, religion. • Medical information Obviously, we hold information related to employment at the school. This will include such things as start date, the hours worked, the post employed in, past roles, training information, details of qualifications, anytime off due to illness and of course salary details. • Information collected during the recruitment process that we retain during your employment including references, proof of right to work in the UK, application form, CV, qualifications; • Employment contract information such as start dates, hours worked, post, roles; • Education and training details; • Details of salary and benefits including payment details, payroll records, tax status information, national insurance number, pension and benefits information; • Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information; • Information in your sickness and absence records such as number of absences and reasons(including sensitive personal information regarding your physical and/or mental health);	You will generally have provided most of the information on your job application with the school but may have updated and changed information over the years. We regularly ask you to update your information to make sure it is accurate. Medical information will have been provided voluntarily so that we are aware of how we can offer any assistance. Information held about your employment will be regularly updated over your time with the school and will include information you provided as part of your application process as well as other career development information.

	• Criminal records information as required by law to enable you to work with children; • Your trade union membership; • Information on grievances raised by or involving you; • Information on conduct and/or other disciplinary issues involving you; • Details of your appraisals, performance reviews and capability issues; • Details of your time and attendance records; • Details in references about you that we give to others.	
Photographs and CCTV	We use your photograph on staff badges and in our employee database. As the school operates CCTV cameras, you will regularly be captured by them during the day and as you move around the school.	CCTV is automatically captured on school property on daily basis. Photographs are staff are taken in line with their employment contract.
Information collected from the use of school equipment	In order to safeguard the school's IT system from attack or misuse, we automatically monitor such things as websites visited, this means that if there is a problem, we can trace the accessing of inappropriate or infected material back to an individual (for example through a recorded IP address).	Monitoring of access to websites and the use of the school network etc. is automatic.

Visitors/Others

Source	Types of Data Collected	How do we collect it?
Direct from the data subject.	This is information that would include: name, contact number, email address, company or other information related to your visit to the school.	You are required to provide this information as part of your access to school premises.
Photographs and CCTV	We use your photograph on visitor badges. As the school operates CCTV cameras, you will regularly be captured by them during the day and as you move around the school.	CCTV is captured on school property on daily basis.

It is likely that some of the personal data which we collect and store about staff, pupils and parents/guardians will include **Special Categories of Personal Data.** Special Categories of Personal Data includes details about an

individual's race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about health and genetic and biometric data.

Use of photographs

We publish photographic images of students on our website, across social media, in publicity documents and on marketing materials, and within our school newsletters. Parental consent will be sought for each student in order for this to happen. Sixth Form students will be consulted directly and asked to give their consent.

What allows you to use my personal data?

As a Data Controller, the school must have a 'lawful basis' for **processing personal data**.

This basis will depend on our reason for collecting and using the data, but to help you understand what basis they may be, we have set out how we use some personal data along with the relevant lawful basis in the table below.

Legal Basis	When	What allows us
Public Task	When we collect and use personal data in order to fulfil part of our function as a school, for example when we are required to use information under the Education Act 2002 as part of our official authority as a school.	Official Authority or Public Task is covered by article 6(1)(e) of the UKUKGDPR.
Legal Obligation	For example, where we need to comply with health and safety laws.	Legal obligation is covered by article 6(1)(c) of the UKUKGDPR.
Contract	To enter into a ***contract*** with you and to meet our obligations under that contract. For example, where we need to process your data in order to provide a specific service which we do under contract, this could be the hiring of musical instruments for an arranged period.	Contract is covered by article 6(1)(b) of the UKUKGDPR.
Legitimate Interest	In other cases, the school has a ***legitimate interest*** in processing personal data during an individual's relationship with the school, this could be the monitoring of access to the School's computer network.	Legitimate interest is covered by article 6(1)(f) of the UKUKGDPR.
Consent	There will be some cases where you give us permission to use your information and this will only be used under ***consent*** – such as the use of pupil photographs.	Consent is covered by article 6(1)(1) of the UKUKGDPR.

	Where we use consent we will ensure it is appropriate and that you have the right to refuse or withdraw consent at any time and that any decision you make to consent is a free one.	

Where the information we process is considered to be '**special category data'** such as health data, we do so under one of the conditions of Article 9 of the UKGDPR. These are:

Article 9 (2)(a) - Where you have given explicit consent for this information to be used.
Article 9 (2)(b) - Where the information is required for us to fulfil our employment obligations
Article 9 (2)(d) - Where it is a legitimate activity, such as monitoring access to our ICT network
Article 9 (2)(f) - Where it would be required to establish, exercise or pursue a legal claim
Article 9 (2)(g) - Where we have identified a substantial public interest, such as the safeguarding of children
Article 9 (2)(h) – Where it is required for reasons of occupational health purposes

Details as to what allows us to process special category data in line with the Data Protection Act 2018 can be found in our Appropriate Policy Document.

Do you share my personal data with anyone else?

We share data with a number of organisations where we are required to do so, for example we routinely share pupil information with schools or colleges that pupils attend after leaving us, our local authority, and the Department for Education (DfE).

We will always tell you where and why data is shared. The following table is a summary of organisations and agencies we share information with to help you understand the type of data we share and why.

Not all data we collect is shared with each of these organisations and you can find out details of what we share with whom in our individual privacy notices

Data Subjects	Information shared with	Legal Basis
Pupils and Parents	There are a number of key organisations we are required to share data with: • the Department for Education (DfE) - on a statutory basis under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013; • Ofsted; • Youth support services – under section 507B of the Education Act 1996, to enable them to provide information regarding training and careers as part of the education or training of 13-19 year olds; • Other Schools that pupils have attended/will attend; • NHS for delivery of child health services, such as inoculation programmes and school nurses. They also use information about pupils for data research and statistical purposes;	Legal Obligation and Public Task

	• NHS Digital for analysing and presenting a range of health & social care data, including height and weight of pupils; • Welfare services (such as social services); • Law enforcement officials such as police, HMRC; • LADO; • Training providers; • Professional advisors such as lawyers and consultants; • Support services (including HR support, insurance, IT support, information security, pensions and payroll); • The local authority; • Named third party service providers	
Staff and Governors	We will routinely share workforce information relating to your employment with: • The Cheshire West and Chester Human Resources team and Transactional Service Centre – Recruitment and Pay and as part of the PRIME Accident Reporting System. • With third parties in order to: • Obtain pre-employment checks such as references from former employers/other organisations; • Undertake necessary criminal records checks from the Disclosure and Barring Service (for specifically identified posts); • Provide payroll services including information to pension scheme providers (Cheshire Pension Fund); • Provide occupational health services (People Asset Management) • Provide training (training organisations commissioned by us to provide training); • Make employee benefits available to you (benefits providers such as Sodexo and Tusker) • Fulfil the school's legal obligations e.g. Police, HRMC, pensions agencies, Student Loans, government agencies, Health and Safety Executive or as instructed by the Court system. We will also disclose your personal information for legitimate purposes to:	Legal Obligation and Public Task

	• Agencies who perform services on behalf of the school for the purposes stated above; • Any recipient, if we are required to do so, such as by applicable court order or law; • Any recipient, with your consent, such as for employment verification or bank loans; or • Any recipient when reasonably necessary such as in the event of a life-threatening emergency	
Visitors/Others	We will also disclose your personal information for legitimate purposes to: • Agencies who perform services on behalf of the school; • Any recipient, if we are required to do so, such as by applicable court order or law; or • Any recipient when reasonably necessary such as in the event of a life-threatening emergency	Legal Obligation and Public Task

In addition, we regularly share pupil information with a number of organisations with the purposes of furthering teaching and learning and providing additional support and guidance to students.

Our legal basis for doing this is that it is in the public interest and the interest of the students to enable them to access resources that will enhance their learning. The full list of organisations is:

Name	Information shared	Reason	Legal Basis
SIMS.net **(Capita)**	All information held about the student is uploaded to SIMS.net. Staff have permissions-controlled access to this.	SIMS is our Management Information System and houses all the information categories detailed above. Staff need access to this in order to perform the basic duties of their role (e.g. to inform teaching and learning, to be able to contact parents).	Public Task to allow us to: • to support pupil learning • to monitor and report on pupil progress • to provide appropriate pastoral care • to assess the quality of teaching and learning • to safeguard pupils
SIMS Parent	SIMS Parent Lite has access to an amount of	SIMS Parent Lite is an app that displays to parents the	Public Task to allow us to:

(Capita)	data from the SIMS.net database. This includes name, surname, contact details, homework, timetable, attendance, achievements, behaviour, assessment, medical information, census data such as mode of transport to school, and reports. This information is accessed for all students in all year groups.	information held on their child in SIMS.net. Parents then have the right to ask for data to be erased or rectified in line with the UKUKGDPR. They can rectify data themselves. When activated, Apple Push Notifications can be sent to summarise events such as new behaviour or achievements. This means that some third party processing takes place.	• to support pupil learning • to monitor and report on pupil progress • to provide appropriate pastoral care • to assess the quality of teaching and learning • to safeguard pupils
SISRA	Name, Gender, SEN, FSM, PP, GT, LAC, Tutor group, Classes, Assessment Data	We use SISRA to track students' assessment data through the school. This is analysed and pupils needing academic, pastoral or other support are identified.	Public Task to allow us to: • to support pupil learning • to monitor and report on pupil progress • to provide appropriate pastoral care • to assess the quality of teaching and learning • to safeguard pupils
Access Reading Tests **(Hodder Education)**	Name, gender, DOB, English class, UPN	Students in Years 7, 8 and 9 have their details uploaded to the ART database in order to access Reading Tests, which help us to put specialist literacy and English support in place where necessary.	Public Task to allow us to: • to support pupil learning • to monitor and report on pupil progress • to provide appropriate pastoral care • to assess the quality of teaching and learning • to safeguard pupils
ALPS	Name, Gender, ID Number, DOB, Ethnicity,	We upload Year 12 and 13 students' data in order to assess how they are	Public Task to allow us to:

	Classes, Exam Results, GCSE APS	performing against national benchmarks.	• to support pupil learning • to monitor and report on pupil progress • to provide appropriate pastoral care • to assess the quality of teaching and learning • to safeguard pupils
Cheshire West and Chester Council (Local Authority)	Student's name, address and date of birth. Parent's name and address. All information we hold about the student, except where a parent of a student under age 16 (or the student themselves, if aged 16+) has instructed us not to provide that information.	Under the Education and Skills Act 2008, we are required to provide this information to the local authority upon receiving a specific request from them. They use the data to support young people's participation in education and training.	Legal Obligation Where we are required to provide information to our parent local authority in line with legislation
Class Charts	Name, surname, classes, teachers, gender, first language, KS2 scores, SEN flag.	This is our behaviour management software which enables teachers and senior management to plan and organise classrooms and seating chats to maximise learning opportunities. The software has a direct, secure link to SIMS.net. The SEN flag is to indicate whether the student has an educational need - no information regarding the need itself is transferred.	Public Task to allow us to: • to support pupil learning • to monitor and report on pupil progress • to provide appropriate pastoral care • to assess the quality of teaching and learning • to allow for the safeguarding of pupils
Exam Boards (AQA, Pearson, OCR)	Legal Forename and Surname, Middle names, gender, DOB, Candidate Number, ULN, UCI, year group, qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades.	The exam boards require us to provide this information in order for the exams to be successfully administered. Please note that Legal Forename and Surname are the details that appear on the birth certificate. We are not permitted to share	Legal Obligation To comply with any legal requirements relating to the administering of exams

	For students needing special consideration, we would also submit brief details of the situation / medical condition leading to disadvantage during exams or coursework. This would include names of figures of authority, such as the student's Hospital Consultant.	shortened versions of these names. Exam Boards require information for all students sitting public examinations; this is likely to be students in Years 11, 12 and 13.	
FFT Aspire	Name, DOB, UPN, Gender, date of admission to school	FFT Aspire are able to calculate using the students' KS2 scores where the student should be at various points in their education. We use this information to assess ourselves.	Public Task to allow us to: • to support pupil learning • to monitor and report on pupil progress • to provide appropriate pastoral care • to assess the quality of teaching and learning
MathsWatch	Name, UPN, DOB, Maths Class.	GCSE students are created accounts with unique IDs and passwords so that they can access Maths resources linked to their exam preparation. Teachers can set homework via this website and track pupils' achievements.	Public Task to allow us to: • to support pupil learning • to monitor and report on pupil progress • to assess the quality of teaching and learning
Microsoft	Name, year group, tutor group and membership of class groups	Provides students with access to the suite of Microsoft Office 365 software (Word, Excel, OneNote, Teams etc.)	Public Task to allow us to: • to support pupil learning • to monitor and report on pupil progress • to provide appropriate pastoral care

			• to assess the quality of teaching and learning
NHS / School Nurse	The NHS draws information initially from the School Census and then double checks this against information provided by the school. This could include name, surname, gender, address, year group and tutor group.	The NHS provide vaccinations to our students in different year groups in liaison with our Welfare Assistants.	Legal Obligation To comply with our obligation to provide this information relating to the number of vaccines given.
ParentMail	Parents obtain access via their email address and mobile phone number which must match those held by the school. We use parents' email addresses to send home letters and important documents. This is the school's Payment System. We use this to facilitate parents making online payments towards school trips and the like. Parents are not required to use this system.		Consent Parents are not required to use this system and details will only be shared where parents have consented to use this system.
Police / Child Services	Data about children who are exposed to suspected or actual domestic abuse.	In cases of suspected/actual domestic abuse, we receive alerts from the Police, via Children's Services and we share any data with them as necessary, to protect children.	Legal Obligation Where we are required to safeguard the wellbeing of any child.
Reading Plus	Students are given a username and password to access the site.	This is an online programme designed to encourage progress in reading and is used by our student support staff to encourage students to read.	Public Task to allow us to: • to support pupil learning • to monitor and report on pupil progress • to assess the quality of teaching and learning
School Comms	Parents have access to their child's attendance, behaviour, rewards and assessment data. Parents obtain access via their email address and mobile phone number which must match those held by the school. We use parents' email addresses to send home letters and important documents.		Consent Parents are not required to use this system and we will only communicate with them via this system where they

	Parents are not required to use this system.		have consented to its use.
XYZ Photography	Name, ID Number, year group and tutor group.	To enable the student to be photographed for school records and for parents to purchase. Parents are not required to agree to photos being taken.	Consent Parents are not required to agree to photos being taken and we will only do so where we have clear consent to do so.

DfE Data collection requirements:

To find out more about the data collection requirements placed on us by the DfE (for example, via the school census) go to https://www.gov.uk/education/data-collection-and-censuses-for-schools.

Youth support services: Pupils aged 13+

Once our pupils reach the age of 13, we pass pupil information to our local authority and/or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996. This enables them to provide youth support services and careers advisers. A parent or guardian can request that **only** their child's name, address and date of birth is passed to their local authority or provider of youth support services by informing us. This right is transferred to the student once they reach the age of 16.

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 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

Where do you store my personal data, is it secure?

Your personal data is stored in a variety of systems – both electronic and paper – held by the school or by a contracted **Data Processor**. Where information is held in electronic format we ensure appropriate security is in place. Where data is held in 'the cloud' we ensure we only use organisations with servers in the EEA/UK. Where information is held in files and documents, we ensure that cabinets, drawers and doors are kept locked when not in use.

We ensure that all **personal data** held by us is handled correctly and appropriately according to the nature of the information, the risk associated with mishandling the data, including the damage that could be caused to an individual as a result of loss, corruption and/or accidental disclosure of any such data, and in accordance with any applicable legal requirements. Should you have any concerns as to how data is handled you can contact the School DPO using the details at the end of this form.

How long will you store my personal data for?

We only store **personal data** for as long as we are required to and in line with our Data Retention Policy, but as a general guide:

- We hold pupil data while pupils remain at this school, after which their file and associated data is transferred to their next school (another primary, secondary or pupil referral unit)
- We are required to keep employment details for a specified period and, in line with the school's retention schedule, this is 6 years from the year staff cease employment with the school. After this time, information we hold will be deleted from systems and paper files securely disposed of.
- CCTV recordings are kept for 30 days and then automatically deleted unless they have been identified as being needed for a specific purpose, for example to investigate an alleged crime.
- Data is held by our **data processors,** for example online suppliers, for as long as we are contracted to use their service.
- Information recorded in or paper sign in/electronic sign in system is kept in line with our retention schedule and is retained for 1 year. After this date, the information is destroyed/deleted.

What rights do I have over how you use my data?

Data Subjects have a number of rights relating to their **personal data** which can be enforced against the **Controller**. These rights can be dependent on our legal basis for processing data so not all are absolute.

- **Right to be informed**: You have the right to be told what Personal Data the school collects and stores about you and how it's used.
- **Right of Access:** You have a right to ask for a copy of any personal information that we hold about you, or your child. This is your most important right and always applies, although there may be reasons why we cannot provide all of the information you request.
- **Right of Rectification:** You can ask us to correct any information we hold that you think may be inaccurate, as well as to complete any information you think is incomplete.
- **Right to Erasure:** This is sometimes called the 'right to be forgotten' meaning that, in some cases, you can ask us to delete information we hold about you. The Right to Erasure is not absolute, this means it is not automatic, and in the majority of cases we may be unable to delete the information we hold. Where we cannot comply with your request, we will explain why.
- **Right to Restriction of Processing:** You may have the right to limit how we use your data and this could include stopping us from deleting it. You can generally do this if you are questioning the accuracy of the information we have or the way in which we are using it.
- **Right to Object to Processing:** You also have the Right to Object to how we process your information. This is similar to the Right of Restriction but means we have to stop using your information. If we are unable to comply with your request, it is our responsibility to prove why we should be able to continue to process your information. If you are objecting to your information being used for marketing purposes, we would have to stop using your information immediately.
- **Right to Data Portability:** You have a right to ask for us to transfer information you gave to us electronically and which is automatically processed, to another organisation. In reality, this right will rarely apply to information we deal with as a school.
- **Rights related to automated decision making:** Where information is used for the purposes of profiling or a decision is made solely by automated means with no human involvement, you have the right to object and ask for human intervention in any decision. The school does not have any automated decision-making function.

The availability of rights largely depends on the legal justification for processing (which are detailed in the relevant drop-down sections below). The table below summarises when rights are available.

Legal Justification	Right to Object	Right to be forgotten (Erasure)	Right not to be subject to Automated Decision Making	Right to Data Portability
Consent	✗ (but can withdraw consent)	✓	✗ (but can withdraw consent)	✓
Contract	✗	✓	✗	✓
Legal Obligation	✗	✗	✗	✗
Vital Interest	✗	✓	✗	✗
Public Task	✗	✗	✗	✗
Legitimate Interest	✓	✓	✓	✗

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

What can I do if I am unhappy with how you use my data?

If you are unhappy with how we use your personal data, want to report a possible breach or just want further information, you can complain directly to the school's Data Protection Officer by email or post.

- Email: Schooldpo@cheshirewestandchester.gov.uk
- By post: SchoolData Protection Officer, 4 Civic Way, Ellesmere Port, CH65 0BE

You also have the right to complain to the Information Commissioner's Office using the following details:

- Information Commissioner's Office (ICO) website
- By post: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- Telephone: 0303 123 1113

Last updated: 04/03/2024

If you have any questions, please contact the School DP Team on SchoolDPO@cheshirewestandchester.gov.uk