



Privacy Policy

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Frequency of review:	Annual

Writtle Infant School respects your and your child's privacy when you use our services and is committed to complying with privacy legislation. This privacy notice explains how we collect, store and use personal data about pupils and parents. We, Writtle Infant School, are the 'data controller' for the purposes of data protection law.

Our data protection officer is Essex County Council. Their role will be to ensure that personal information is processed fairly and lawfully, respecting your rights and ensuring we follow the law. If you have any concerns or questions regarding how we look after your personal information, please [contact the school](#).

1. The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about pupils and parents includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Characteristics such as ethnic background, eligibility for free school meals, or special educational needs
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs
- CCTV images captured in school

We may also hold data about pupils that we have received from other organisations, including other schools, local authorities and the Department for Education. This information can be held in computer files or on paper.

2. Why we use this data

We use this data to:

- Support pupil learning
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Protect pupil welfare

- Assess the quality of our services
- Administer admissions waiting lists
- Carry out research
- Comply with the law regarding data sharing

3. Our legal basis for using this data

We only collect and use pupils' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation
- We need to ensure a child's safety, for example in obtaining contact details
- We need it to perform an official task in the public interest

Less commonly, we may also process pupils' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use pupils' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn. Some of the reasons listed above for collecting and using pupils' personal data overlap, and there may be several grounds which justify our use of this data.

4. Collecting this information

While the majority of information we collect about pupils is mandatory, there is some information that can be provided voluntarily. Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

5. How we limit the use of personal information

Where necessary Writtle Infant School processes personal data to deliver our services effectively; but wherever possible, the data that we process will be anonymised, pseudonymised or de-personalised. This means the information can no longer identify a person.

When using personal data for research purposes, the data will be anonymised/pseudonymised to avoid the identification of a person, unless you have agreed that your personal information can be used for the research project.

We do not sell personal data to any other organisation for the purposes of selling products.

6. How long do we keep your personal information?

For each reason why we use your personal information, there is often a legal reason why we need to keep it for a period of time. We try to capture all of these and detail them in what's called a 'retention schedule'. We use the [record retention schedule in the IRMS Information Management Toolkit for schools](#) as our guide to how long we keep information about pupils. We keep personal information

about pupils while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations.

7. Who will we share your personal information with?

We do not share information about pupils with any third party without consent, unless the law and our policies allow us to do so. Where it is legally required, or necessary for education-related purposes and it complies with data protection law, we may share personal information about pupils with:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
- The Department for Education
- The pupil’s family and representatives
- Educators and examining bodies
- Our regulator, Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Financial organisations
- Central and local government
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies

We may also share your personal information when we feel there is a good reason that is more important than protecting your confidentiality. This does not happen often, but we may share your information:

- to protect a child,
- if there are serious risks to the public, our staff or to other professionals; or
- to help detect and stop crime or fraud.

The law does not allow us to share your information without your permission, unless there is proof that someone is at risk or it is required by law. This risk must be serious before we can go against your right to confidentiality. When we are worried about physical safety or we feel that we need to take action to protect someone from being harmed in other ways, we will discuss this with you and, if possible, get your permission to tell others about your situation. We may still share your information if we believe the risk to others is serious enough to do so.

There may also be rare occasions when the risk to others is so great that we need to share information straight away. If this is the case, we will make sure that we record what information we share and our

reasons for doing so. We will let you know what we have done and why as soon as or if we think it is safe to do so.

We use a range of companies and partners to either store personal information or to manage it for us. Where we have these arrangements there is always a contract, memorandum of understanding or information sharing protocol in place to ensure that the organisation complies with data protection law. Writtle Infant School is a signatory to the Whole Essex Information Sharing Framework, an overarching agreement between Essex County Council and all partners to share information where relevant or where there is a legal requirement to do so. You can [download and read the WEISF information sharing protocols here](#). We complete privacy impact assessments before we share personal information to ensure their compliance with the law.

8. National Pupil Database

We are required to provide information about pupils to the Department for Education 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 Department and provides evidence on school performance to inform research. The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards. The Department for Education 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. For more information, see the Department's webpage on how it collects and shares research data. You can also contact the Department for Education with any further questions about the NPD.

9. If your information leaves the UK

Sometimes, for example where we receive a request to transfer records to a new organisation, it is necessary to send that information outside of the UK. In such circumstances additional protection will be applied to that data during its transfer. Where we transfer personal data to a country or territory outside the European Economic Area, we will seek advice from the Information Commissioner's Office and follow data protection law.

10. Your rights regarding personal data

You have the right to ask for all the information we have about you. Parents/carers 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 (usually under the age of 12), or where the child has provided consent. When we receive a request from you in writing (a 'subject access request'), and if we do hold information about you or your child, 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 or your child
- 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

However, we will not let you see any parts of your record which contain:

- Confidential information about other people; or
- Data which an information professional thinks will cause serious harm to your, or someone else's, physical or mental wellbeing; or
- If we think that the prevention or detection of crime may be adversely affected by disclosing data to you.

This applies to paper and electronic records. If you ask us, we will also let others see your record (except if one of the points above applies). If you cannot ask for your records in writing, we will make sure there are other ways you can apply.

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances. If you would like to make a request please contact our data protection officer.

Parents/carers also have a legal right to access to their child's educational record. To request access, please [contact our Headteacher, Mrs Helen Castell](#).

11. Changing information you believe to be inaccurate

You should let us know if you disagree with something written on your file. We may not always be able to change or remove the information; however, we will correct factual inaccuracies and may include your comments in the records. Please [contact the school](#) to report inaccurate information.

12. Asking for your information to be deleted (right to be forgotten)

In some circumstances you can request the erasure of the personal information used by Writtle Infant School, for example:

- Where the personal information is no longer needed for the purpose for which it was collected
- Where you have withdrawn your consent to the use of your information (where there is no other legal basis for the processing)
- Where there is no legal basis for the use of your information
- Where erasure is a legal obligation
- Where personal information has been shared with others, we will make every reasonable effort to ensure those using your personal information comply with your request for erasure.

Please note that the right to erasure does not extend to using your personal information where:

- it is required by law
- it is used for exercising the right of freedom of expression
- it is in the public interest in the area of public health
- it is for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes where it would seriously affect the achievement of the objectives of the processing

- it is necessary for the establishment, defence or exercise of legal claims.

13. Restricting what your information is used for

You have the right to ask us to restrict what we use your personal data for, where one of the following applies:

- You have identified inaccurate information, and have notified us of this
- Where using your information is unlawful, and you wish us to restrict rather than erase the information
- Where you have objected to us using the information, and the legal reason for us using your information has not yet been provided to you

When information is restricted it cannot be used other than to securely store the data, and with your consent, to handle legal claims, protect others, or where it is for important public interests of the UK.

Where restriction of use has been granted, we will inform you before the use of your personal information is resumed.

You have the right to request that we stop using your personal information for some services. However, if this request is approved this may cause delays or prevent us delivering a service to you. Where possible we will seek to comply with your request, but we may need to hold or use information in connection with one or more of our legal functions.

14. Other rights

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

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being made about you by automated means (by a computer or machine, rather than by a person), unless it is required for any contract you have entered into, required by law, or you have consented to it.
- Object to being 'profiled', where decisions are made about you based on certain things in your personal information. If and when we use your personal information to profile you, you will be informed.
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please [contact our data protection officer](#).

15. How do we protect your information?

We will do what we can to make sure we hold personal records (on paper and electronically) in a secure way, and we will only make them available to those who have a right to see them. Our security includes:

- Encryption, to allow information to be hidden so that it cannot be read without special knowledge (such as a password). This is done with a secret code or cypher. The hidden information is said to be encrypted.

- Pseudonymisation, to allow us to hide parts of your personal information from view so only we can see it. This means that someone outside of Writtle Infant School could work on your information for us without ever knowing it was yours.
- Controlling access to systems and networks to stop people who are not allowed to view your personal information from getting access to it.
- Training for our staff to make them aware of how to handle information and how and when to report when something goes wrong.
- Ways for us to access your information should something go wrong and our systems not work, including how we manage your information in event of an emergency or disaster.
- Regular testing of our technology and processes, including keeping up to date on the latest security updates (commonly called patches).

View our [policy on information security](#).

16. Advice & complaints about data protection

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 raise this with us in the first instance. To make a complaint, please contact our data protection officer.

For independent advice about data protection, privacy and data sharing issues, you can contact the Information Commissioner's Office (ICO).

- Visit the website at ico.org.uk
- Report a concern online at ico.org.uk/concerns
- Call 0303 123 1113
- Email casework@ico.org.uk
- Write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

17. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please [contact our data protection officer](#). This notice is based on the Department for Education's model privacy notice for pupils, amended for parents to reflect the way we use data in this school.