



General Data Protection Regulation Privacy Notice

HOLBROOK PRIMARY SCHOOL

1. Who processes your information?

The School is the data controller of the personal information you provide to us. This means the School determines the purposes for which, and the manner in which, any personal data relating to pupils and their families is to be processed. The School's address and contact details are: Holbrook Primary School, Gateside Road, Coventry, CV6 6FR. Email: Admin@holbrook.coventry.sch.uk, Tel No: 02476 688947.

Jessica Sweet acts as a representative in the form of Data Protection Officer for the School with regard to its data controller responsibilities; they can be contacted on 02476831068 or Jessica.Sweet@coventry.gov.uk. Their role is to oversee and monitor the School's data protection procedures and to ensure they are compliant with data protection legislation.

The School's registration as a data controller is: Z4589624

2. Why do we collect and use your information?

The School right to collect and use personal data relating to pupils and their families and we may also receive information regarding them from their previous School, Local Authority and/or the Department of Education. We collect and use personal data in order to meet legal requirements and public interest set out in the GDPR and applicable domestic law, including those in relation to the following:

- Article 6 and Article 9 of the General Data Protection Regulation
- Education Act 1996
- Regulation 5 of The Education (Information About Individual Pupils) (England) Regulation 2013

In accordance with the above, the personal data of pupils and their families is collected and used for the following reasons:

- To support pupil learning
- To monitor and report on pupil progress
- To provide appropriate pastoral care
- To assess the quality of our service
- To comply with the law regarding data sharing
- To safeguard pupils
- For the prevention and detection of crime

3. Which data is collected?

The categories of pupil information that the School collects, holds and shares include the following:

- Personal information – e.g. names, pupil numbers and addresses, siblings
- Characteristics – e.g. ethnicity, language, nationality, country of birth and free school meal eligibility
- Attendance information – e.g. number of absences and absence reasons
- Assessment information – e.g. national curriculum assessment results
- Relevant medical information (such as doctors' information, child health, dental health, allergies, medication and dietary requirements)
- Information relating to SEND
- Behavioural information – e.g. number of temporary exclusions
- voicemails
- photographs for identification purposes
- CCTV images for safeguarding purposes
- As a school, we need to process special category personal data (e.g. concerning health, ethnicity, religion and criminal records information about some individuals. We do so in accordance with applicable law (including with respect to safeguarding) or by explicit consent. Where we collect special category data, we have a lawful basis under Article 9 (2) GDPR. For example, where we collect health information, for a substantial public interest under Article 9 (2) (g), we will have the appropriate policy document in place, (link to [special](#) category data policy] as is required.
- In the case of ethnicity we will ask for explicit consent to the processing of those personal data.

The categories of parent /carer information the Schools collects, holds and shares include the following:

- Personal information – e.g. names and addresses, emergency contact information
- Free School Meal eligibility
- CCTV images for safeguarding purposes

Whilst the majority of the personal data you provide to the School is a legal requirement or public task requirement some is provided on a voluntary basis. When collecting data, the School will inform you whether you are required to provide this data or if your consent is needed. Where consent is required the School will provide you with specific and explicit information with regards to the reasons the data is being collected and how the data will be used, e.g. photographs for display purposes.

We may receive information regarding you directly from the Local Authority and previous education establishment [other establishment that may provide the school information about the child/parents directly is Social Services or MGSS].

Parents who are providing consent on behalf of their children must hold parental responsibility.

4. Who can access this data?

We are committed to ensuring that your information is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure the information we collect. The electronic data that we collect from you will be transferred to and stored by a processor who abides by a contractual agreement. Where the School uses a processor, the same data protection standards that the School upholds are imposed on the processor.

The categories of people within the School who can access this data will depend on which data they are authorised to access. Members of School staff are limited to only the information they require to perform their duties. Access to electronic data will be password protected and hard copy files will be securely stored for authorised use.

5. How long is your data stored for?

We retain personal data only for a legitimate and lawful reason and only for so long as necessary or required by law. Personal data relating to pupils, their families at the School is stored in line with the School's **Data Protection Policy** and **Record Retention Schedule**. [\[links\]](#).

6. Will my information be shared?

The School is required to share pupils' data with the Department of Education on a statutory basis. The National Pupil Database (NPD) is managed by the Department of Education and contains information about pupils in Schools in England. The School is required by law to provide information about our pupils to the Department of Education as part of statutory data collections, such as the School census; some of this information is then stored in the National Pupil Database .

The Department of Education may share information about our pupils from the National Pupil Database with third parties who promote the education or wellbeing of children in England by:

- Conducting research or analysis.
- Producing statistics.
- Providing information, advice or guidance.

The Department of Education has robust processes in place to ensure the confidentiality of any data shared from the NPD is maintained. The School will not share your personal information with any third parties without your consent, unless the law allows us to do so.

The School routinely shares pupils' information due to a legal obligation or public task duty with:

- Pupils' destinations upon leaving the School
- The National Health Service
- The Department of Education
- The Local Authority -The Education (Information About Individual Pupils) (England) Regulations 2013 and Education (Pupil Registration) (England) Regulations 2006 enable the processing of information such as admissions, attendance, common transfer file, curricular record, educational record and SEN Reports attached to individual pupils by requiring Schools to provide such the information to either the local authority or the Secretary of State as is so requested.
- Ofsted will infrequently require short term access to personal information from pupils to generate regulatory reports.

- Authorities in relation to the prevention of crime.
- Suppliers and service providers – to enable them to provide the service we have contracted them for. Please see the Appendix 1 to this notice for more information about third parties.

We do not transfer your data outside the EEA

What are your rights?

This section applies to parents/guardians who hold parental responsibility and pupils have the following rights in relation to the processing of their personal data. You have the right to:

- Be informed about how the School uses your personal data.
- Request access to the personal data that the School holds via a subject access request addressed to the School address above.
- Request that your personal data is amended if it is inaccurate or incomplete. If you believe that any information we are holding is incorrect or incomplete, please contact us and we will promptly correct your personal information found to be incorrect.
- Request that your personal data is erased where there is no compelling reason for its continued processing.
- Request that the processing of your data is restricted in certain circumstances.
- Object to your personal data being processed when we have relied on legal obligation and public task duty as our lawful basis.
- Where the processing of your data is based on your consent, you have the right to withdraw this consent at any time.

Information Commissioner's Office (ICO)

If you have a concern about the way The School is collecting or using your personal data, you can raise a concern with School's Data Protection Officer with the details provided above or the Information Commissioner's Office (ICO). The ICO can be contacted on 0303 123 1113, Monday-Friday 9am-5pm.

7. What data is collected on this site?

Cookies Policy

The School is committed to providing you with the best online experience while visiting our website(s). As part of this process, we use standard third party cookies to collect data about your behaviour online while you are on our sites, and we also track information about the number of times our site is visited and the number of people who return to our site. We track all information as a whole and therefore we do not collect any personal information about you as an individual. Cookies are not computer programs and cannot contain viruses. For more information on how they work please follow this link: <https://www.cookie-law.org/the-cookie-law/>

How we use cookies

Our site does not use any invasive cookies on our site to collect your personal information. We use industry standard third party cookies to track your behaviour online and gain statistical information in the following ways:

- We track the number of visits to our website, where each visitor came from (i.e. the site visited prior to coming to our sites) and where each visitor goes to from our site (the next site visited after ours).
- We store cookies on your **PC for no longer than 6 months.**
- If you share your computer, we advise that you select the 'Don't remember my details' option when you sign out of your account for your own account security. This will remove all details from the cookie. **When you visit our site, you can refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies.** However, if you select this setting you may be unable to access certain parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies when you log on to our site.

8. Where can you find out more information?

If you would like to find out more information about how we use and store your personal data please visit our website and download our Data Protection Policy. Please also see websites listed below:

Department of Education

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

How DfE share data: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

Google Analytics

<http://www.aboutcookies.org/>

<http://www.allaboutcookies.org/>
see how Google uses cookies and why)

ICO

Concerns: <https://ico.org.uk/concerns/>

9. Changes to our privacy policy

We keep our privacy policy under review and we will place any updates on this webpage. This privacy notice was last updated in April 2020.

Appendix 1

In addition to the organisations mentioned above, we also use third party services/suppliers to help us to carry out our functions as a school.

Personal data	Supplier/service	Reason why it is processed	Lawful basis
All pupil data included in the Common Transfer File; i.e. registration, attendance, basic identifiers, parent information, medical and dietary information, consents received for pupil.	SIMS	School's information management system	Legal obligation Public task duty
Safeguarding Information	CPOMS	Safeguarding log	Public task duty
Parent and pupil basic identifiers, parent , phone number.	Schoolcomms, 360 Pay	Provision of payments within school, electronic communications directly to parent email/phone	Public task duty
Basic identifiers (name, email of parent) [photographs]		Providing a learning journal for pupils	Public task duty Consent for group photographs Substantial public interest
Basic identifiers, plus behaviour information	Sims CPOMS	Logging pupil behaviour information	Public task duty
Basic identifiers (pupil names)	Google classroom Mathletics/Times Tables Rockstars	Providing pupils with learning online	Public task duty
Basic identifiers, DOB, SEN information, class, attainment and assessment information	FFT	Tracking pupil assessments	Legal obligation
Photographs	Photography company - Braiswick	Identification of pupils and for displays/website/school social media	Public task for identification Consent for displays/website etc
Basic identifiers for parents (name/email)	Edenred	Providing free school meal vouchers	Public task duty
All pupil/staff/parent information	Admin IT provider Curriculum IT provider	Providing IT support to curriculum and admin	Legal Obligation Public task duty
All Pupil Staff parent information	Wonde	Data extraction service to allow accurate migration of information from the school's MIS to third party suppliers.	Public task

Staff/Parent/Pupil/Visitor information such as name, car registration and photograph	Inventry Electronic signing In system	Stores information of those on the school site	Legal obligation Public task duty
All Pupil Staff Parent information	Microsoft Applications: Outlook 365 OneDrive SharePoint	Outlook 365 for email correspondence OneDrive for secure storage and remote access SharePoint for sharing and receiving files that hold minimal data	Public task duty
Basic identifiers, photograph	The webpage processor – Link it IT	Provision of the school's webpage	Public task Consent for photographs
Additional services			