

Sutton Veny CofE Primary School

Privacy Notice for Pupils/Parents & Carers

Together, through **friendship**, in **peace** and with **courage**, we reach for the stars.
Colossians 3:12: ‘**clothe yourselves with compassion, kindness, humility, gentleness and patience.**’

1 Introduction

- 1.1 Sutton Veny CofE Primary School ("we", "our", "us", "the school") is a maintained school and I the data controller for the personal data we process. This Privacy Notice explains how we collect, use, and protect your personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.
- 1.2 For any queries regarding this notice, you can contact our **Data Protection Officer (DPO)**:
- **Name:** [DPO Name]
 - **Email:** dpo@jeremyshatford.co.uk
 - **Phone:** [DPO Contact Number]
- Our DPO is an external advisor and operates independently of our decision-making processes, ensuring compliance with UK GDPR.

2 What Personal Data We Collect

- 2.1 We process personal data about pupils, parents/carers, staff, and other individuals connected to the school. This includes:
- **Pupil Data:** Name, date of birth, contact details, assessment records, attendance, behaviour records, medical information, special educational needs (SEN) details.
 - **Parent/Carer Data:** Contact details, relationship to child, communication preferences.
 - **Staff Data:** Employment details, qualifications, payroll information, DBS checks.
 - **Technical Data:** IP address, browser type (when accessing school IT systems).

3 Why We Collect Your Data

- 3.1 We process personal data for the following purposes:
- To provide **education and support** for pupils.
 - To fulfil our **legal and statutory obligations** (e.g., reporting to the Department for Education).
 - To ensure the **safeguarding and welfare** of pupils and staff.
 - To manage **school operations**, including payroll, HR, and IT services.
 - To comply with **health and safety** regulations.

4 Lawful Basis for Processing

- 4.1 We process personal data under the following lawful bases:
- **Legal Obligation** – When processing is required by law (e.g., education law, safeguarding requirements).
 - **Public Task** – When processing is necessary for the school's official functions.
 - **Legitimate Interests** – For activities such as communication with parents and alumni.
 - **Consent** – When necessary, such as for certain types of media or marketing.
- 4.2 For special **category data** (e.g., health information), processing is justified under:
- **Substantial public interest** (safeguarding, equality of opportunity).
 - **Explicit consent** (where applicable).

5 Data Sharing & Third-Party Processors

- 5.1 We only share personal data when necessary. This includes:
- **Department for Education (DfE):** To meet statutory requirements.
 - **Local Authority:** For safeguarding and SEND support.
 - **Wonde:** To facilitate secure data transfer with educational apps.
 - **Microsoft 365:** For school email, cloud storage, and document management.
- 5.2 Where data is processed by third-party providers, we ensure contracts are in place under **UK GDPR Article 28**.

6 International Data Transfers

- 6.1 If we transfer data outside the UK (e.g., Microsoft 365 cloud services), we ensure appropriate safeguards are in place, such as **UK International Data Transfer Agreements (IDTAs)** or **Standard Contractual Clauses (SCCs)**.

7 Data Retention

- 7.1 We retain personal data in accordance with our **Records Management Policy**, following legal guidance such as the **IRMS Schools Toolkit**. Examples include:
- **Pupil records** – Until the child reaches **25 years old**.
 - **Safeguarding records** – Retained as per **statutory guidance**.
 - **Financial records** – Kept for **7 years**.

8 Your Data Protection Rights

- 8.1 Under UK GDPR, you have the right to:
- **Access** your data (Subject Access Request).
 - **Rectify** inaccurate information.
 - **Erase** data in certain circumstances.
 - **Restrict processing** if applicable.
 - **Object** to processing in specific cases.
 - **Withdraw consent** (where processing is based on consent).
- 8.2 Please note, some rights are not absolute and may not apply if data is processed under a legal obligation or public task.

9 Data Security

- 9.1 We implement appropriate security measures to prevent unauthorised access, loss, or misuse of personal data. These include:
- Encryption and secure access controls.
 - Regular audits and compliance checks.
 - Staff training on data protection.

10 National Pupil Database (NPD)

- 10.1 We share pupil data with the **Department for Education (DfE)** for inclusion in the **National Pupil Database (NPD)**. Parents can find more information or opt out of certain data sharing at: <https://www.gov.uk/guidance/how-to-opt-out-of-sharing-your-childs-school-data>.

11 Contact & Complaints

- 11.1 For any queries, in the first instance please contact us via the school office or by email: admin@suttonveny.wilts.sch.uk. or our **Data Protection Officer (DPO)** at dpo@jeremyshatford.co.uk.
- If you are dissatisfied with our response, you have the right to lodge a complaint with the

Information Commissioner's Office (ICO) at:

<https://ico.org.uk/make-a-complaint/>

- 11.2 This Privacy Notice is reviewed regularly and may be updated to reflect changes in legislation or school practices. Please check our website for the latest version.

12 Document History

Approved by:	DPO and Governing Body	Date: March 2024
Last reviewed on:	March 2024	
Next review due by:	March 2026	