



## Privacy Notice: Winton Primary School

### Introduction

Winton Primary School is committed to protecting the privacy and security of the personal information we hold about pupils, parents and carers.

This Privacy Notice explains how and why we collect, use, store and share personal information about pupils and their families. It also explains your rights under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Winton Primary School is part of the Southern Education Trust and is the **Data Controller** for the personal information it processes.

### The Categories of Information We Collect

#### Pupil Information

We may collect, hold and process the following categories of personal information about pupils:

##### Personal Information

- Full name
- Date of birth
- Unique Pupil Number (UPN)
- Gender
- Home address
- Contact details

##### Characteristics Information

- Ethnicity
- Nationality
- Country of birth
- First language
- Free School Meal eligibility
- Service Child Indicator

##### Educational Information

- Assessment results
- Attainment data
- Progress records
- Attendance records
- Behaviour records
- Exclusion information
- Special Educational Needs and Disabilities (SEND) information
- Educational support records

## **Health and Welfare Information**

- Medical conditions
- Allergies
- Dietary requirements
- Accident and injury records
- Details required to support pupils' welfare and safeguarding

## **Safeguarding Information**

- Child protection records
- Safeguarding concerns
- Information provided by external agencies where necessary

## **Photographs and Media**

- School photographs
- Images and videos used for educational, safeguarding or promotional purposes where appropriate

## **Parent and Carer Information**

We may collect information relating to parents and carers including:

- Names
- Addresses
- Telephone numbers
- Email addresses
- Emergency contact details
- Parental responsibility information
- Court orders affecting a pupil
- Correspondence and communications with the school

## **1. Why we collect and use your personal information**

We process personal information to:

- Provide education and support pupil learning
- Monitor and report on pupil attainment and progress
- Maintain pupil records
- Safeguard children and promote welfare
- Support pupils' health and wellbeing
- Communicate with parents and carers
- Administer school trips, clubs and activities
- Manage school meals and Free School Meals
- Meet legal and statutory obligations
- Support school improvement and planning
- Ensure site security and safety
- Meet Department for Education (DfE) and Local Authority reporting requirements

## 2. Lawful Basis for Processing

Under UK GDPR, schools rely on a number of lawful bases for processing personal information.

### [Public Task](#)

Article 6(1)(e)

Most pupil information is processed because it is necessary for the school to carry out its official functions and duties in providing education.

### [Legal Obligation](#)

Article 6(1)(c)

Some information must be processed to comply with legal requirements placed upon schools, including education, safeguarding, attendance, health and safety and statutory reporting obligations.

### [Legitimate Interests](#)

Article 6(1)(f)

In limited circumstances, we may process information where it is necessary for the legitimate interests of the school or a third party and does not override the rights and freedoms of individuals.

### [Consent](#)

Article 6(1)(a)

Where consent is required, for example for certain uses of photographs or specific educational services, consent may be withdrawn at any time.

## Special Category Personal Data

Some information requires additional protection under UK GDPR.

This may include:

- Ethnicity
- Religious beliefs
- Health information
- SEND information
- Biometric data (if applicable)
- Safeguarding information

We process this information under appropriate conditions set out in Article 9 UK GDPR and the Data Protection Act 2018, particularly where processing is necessary:

- For reasons of substantial public interest

- To provide health or social care support
- To safeguard children and vulnerable individuals

### **3. How we collect information**

Information may be obtained:

- Directly from parents and carers
- From pupils
- From previous schools
- From Local Authorities
- From health professionals
- From safeguarding partners
- From the Department for Education
- From other organisations where permitted by law

Where information is mandatory, we will explain this at the point of collection.

### **Automated Decision Making**

The school does not make decisions about pupils based solely on automated processing that would have a legal or similarly significant effect.

### **4. How we store information**

Information is stored securely using a combination of:

- Electronic management systems
- Cloud-based education systems
- Secure paper records
- The school implements appropriate technical and organisational security measures to protect personal information against:
  - Unauthorised access
  - Loss
  - Misuse

- Alteration
- Disclosure

Access is restricted to authorised individuals who require information to perform their role.

## **5. How long we keep information**

The school retains information in accordance with:

- The Data Protection Act 2018
- UK GDPR
- The Information and Records Management Society (IRMS) Schools Toolkit
- The school's Records Retention Schedule

Educational records are normally transferred to a pupil's next school when they leave.

Certain records may be retained for longer periods where required by law, safeguarding requirements or legitimate educational purposes.

Further information is available upon request.

## **6. Who we share information with**

We may routinely share information with:

- Southern Education Trust
- Schools attended after leaving Winton Primary School
- Bournemouth, Christchurch and Poole Council
- Department for Education (DfE)
- NHS healthcare providers
- School Nursing Services
- Social Care Services
- Safeguarding partners
- Examination, assessment and educational support providers
- School meal providers
- Educational software providers used by the school
- Professional advisers and auditors where required

We only share information where there is a lawful basis to do so.

## **Department for Education (DfE)**

The school is required by law to provide information to the Department for Education through statutory collections, including the School Census.

The Department for Education may store information within the National Pupil Database (NPD).

The DfE uses this information to:

- Develop education policy
- Monitor educational outcomes
- Allocate funding
- Conduct research and statistical analysis

Further information is available at:

<https://www.gov.uk/education>

## **7. Use of Educational Technology**

The school uses various educational and administrative systems to support teaching, learning, communication and school management.

These may include:

- Management Information Systems
- Learning platforms
- Assessment tools
- Communication systems
- Online educational resources

Appropriate contracts and data processing agreements are in place to ensure personal information is handled securely.

## **8. CCTV**

The school operates CCTV systems for:

- Safeguarding pupils, staff and visitors
- Health and safety purposes
- Preventing and detecting crime
- Protecting school property

Images may be shared with law enforcement agencies where there is a lawful basis to do so.

CCTV footage is normally retained for a limited period unless required as part of an investigation.

Further information is available in the school's CCTV Policy.

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## **9. International Transfers**

The school does not routinely transfer personal information outside the United Kingdom.

Where this becomes necessary through the use of approved educational software providers, appropriate safeguards will be implemented in accordance with UK GDPR.

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.

## **10. Your rights**

Under UK GDPR, parents and eligible pupils have the right to:

- Access personal information held by the school
- Request correction of inaccurate information
- Request erasure of information in certain circumstances
- Request restriction of processing
- Object to certain processing activities
- Withdraw consent where consent is relied upon
- Receive certain personal information in a portable format where applicable
- Complain to the Information Commissioner's Office (ICO)

Some rights may be restricted where exemptions apply under data protection legislation.

## **11. Subject Access Requests**

You have the right to request access to personal information that the school holds about you or your child.

Requests should be made in writing to the school using the contact details below.

The school will respond without undue delay and normally within one calendar month.

## 12. Complaints

If you have concerns regarding how personal information is processed, please contact the school's Data Protection Lead or Data Protection Officer in the first instance.

You also have the right to lodge a complaint with:

### **Information Commissioner's Office (ICO)**

Website: [www.ico.org.uk](http://www.ico.org.uk)

Telephone: 0303 123 1113

## 13. How to contact us for further information

### **Data Protection Lead**

#### **Mr Simon Churchill**

Business Manager

Winton Primary School

Oswald Road

Bournemouth

BH9 2TG

Email: [Office@wintonprimary.bournemouth.sch.uk](mailto:Office@wintonprimary.bournemouth.sch.uk)

Telephone: 01202 513988

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### **Data Protection Officer**

#### **Handsam Ltd**

6 Regents Court

Far Moor Lane

Redditch

Worcestershire

B98 0SD

Email: [info@handsam.co.uk](mailto:info@handsam.co.uk)