



The Winterton Federation
Privacy Notice for Parents/Carers
How we use your child’s personal data



Privacy Notice Published October 2024

The categories of pupil information that we collect, hold and share include, but is not restricted to:

- personal identifiers and contacts (such as name, unique pupil number, contact details and address);
- characteristics (such as ethnicity, language and free school meal eligibility);
- safeguarding (such as court orders and professional involvement);
- special educational needs (including the needs and ranking);
- medical and administration (such as doctors’ information, child health, dental health, allergies, medication and dietary requirements);
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended);
- assessment and attainment (such as phonics results, statutory assessment results and any other relevant results);
- behavioural (such as exclusions and any relevant alternative provision put in place);
- activities and trips (this may include information to support your child on a school trip);
- images (used to identify your child; you will have to give consent for these to be published on the federation website);
- CCTV images;
- Catering services to provide your child with a meal during the school day or any additional snacks or drinks.

The federation also uses a number of third-party processors.

Name	Company	Purpose of Sharing Data
Arbor	Arbor	School information data base
CPOMS	CPOMS Systems Ltd	Pastoral care record system
ParentPay	ParentPay	Payment System
Tapestry	The Foundation Stage Forum Ltd	EYFS online learning journey
Times Table Rock Stars	Maths Circle Ltd	Times tables tracking
Spelling Shed	EdShed	Spelling Scheme
Robinwood	Robinwood Outdoor Pursuit Centre	Safety and medical information
Ping	Ping	Communication system
Ninehundred Communications Group	Ninehundred Communication Ltd	School computing network
Purple Mash	2simple	Cross Curricular online learning
Microsoft	Academia	Digital Educational platform
Checkie	Checkie Ltd	Signing In System



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Why we collect and use pupil information

We collect and use pupil information, for the following purposes:

- to support pupil learning;
- to monitor and report on pupil attainment progress;
- to provide appropriate pastoral care;
- to assess the quality of our services;
- to keep children safe (food allergies, or emergency contact details);
- to meet the statutory duties placed upon us by the Department for Education (DfE) data collections.

Under the UK General Data Protection Regulation (UK-GDPR), the lawful bases we rely on for processing pupil information are:

- Article 6 (1) (c); *“processing is necessary for **compliance with a legal obligation** to which the controller is subject”*
- Article 6 (1) (e) *“processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller”*.

In addition, concerning any special category data we rely on Article 9:

- Article 9 (2) (a); the data subject has given explicit consent to the processing of those personal data for one or more specified purposes;
- Article 9 (2) (c) to protect the vital interests of the individual;
- Article 9 (2) (f) in the event of legal claims or judicial acts;
- Article 9 (2) (i) as required for the purpose of public health (with a basis in law).

Collecting pupil information

We collect pupil information via the following methods:

- Registration forms on entry to either federation school;
- Common Transfer Forms (CTF);
- Secure File Transfer from a previous school, such as CPOMS;
- Online collection via Microsoft forms.

We also collect information on a yearly basis via the following:

- An online form for parents to complete;
- Updating information via a third-party app.

Pupil data is essential for the federation's operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this.

NB - it is the responsibility of parents/carers to inform the federation of any changes to information, e.g., address, contact phone number etc.



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Storing pupil data

We hold pupil data securely for the set amount of time shown in our data retention schedule. We have adopted the Information and Records Management Society (IRMS) recommendations as our data retention schedule.

Who we share pupil information with

We routinely share pupil information with:

- schools that pupils attend after leaving us;
- our local authority;
- the Department for Education (DfE);
- National Health Service;
- targeted and family support services;
- the Police;
- the Courts and the Children and Family Court Advisory and Support Service (Cafcass).

Why we regularly share pupil information

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so, for example, we must share pupil information in accordance with the Education (Pupil Information) (England) Regulations 2005 and Keeping Children Safe in Education Statutory Guidance.

Department for Education (DfE)

The DfE collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our pupils with the DfE either directly or via our local authority for the purpose of data collections, under section 3 of the Education (Information About Individual Pupils) (England) Regulations 2013.

All data is transferred securely and held by the DfE under a combination of software and hardware controls, which meet the current government security policy framework. For more information, please see 'How Government uses your data' section. For privacy information on the data the DfE collects and uses, please see <https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3>

Requesting access to your personal data

The UK-GDPR gives parents and pupils certain rights about how their information is collected and used. To make a request for your personal information, or be given access to your child's educational record, contact Mrs Cheryl Baxter (Business Manager) (sbm.wintertonfederation@northlincs.gov.uk) or Mr Tim Pinto at The E-Safety Office Ltd (tpinto@esafetyoffice.co.uk).

You also have the following rights:

- the right to be informed about the collection and use of your personal data - this is called 'right to be informed';
- the right to ask us for copies of your personal information we have about you - this is called 'right of access', this is also known as a Subject Access Request (SAR), data subject access request or right to access request;



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- the right to ask us to change any information you think is not accurate or complete - this is called 'right to rectification';
- the right to ask us to delete your personal information - this is called 'right to erasure';
- the right to ask us to stop using your information - this is called 'right to restriction of processing';
- the 'right to object to processing' of your information, in certain circumstances;
- rights in relation to automated decision making and profiling;
- the right to withdraw consent at any time (where relevant);
- the right to complain to the Information Commissioner if you feel we have not used your information in the right way;
- there are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it, for example, some rights will not apply:
 - a) right to erasure does not apply when the lawful basis for the processing is legal obligation or public task;
 - b) right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests;
 - c) right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you do not have the right to object, but you have the right to withdraw consent.

If you wish to make a Subject Access Request, please contact Mrs Cheryl Baxter on sbm.wintertonfederation@northlincs.gov.uk

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

For further information on how to request access to personal information held centrally by the DfE, please see the 'How Government uses your data' section of this notice.

Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting Mrs Cheryl Baxter via sbm.wintertonfederation@northlincs.gov.uk

Contact

If you would like to discuss anything in this privacy notice, please contact either Mrs Cheryl Baxter or our Data Protection Officer, Mr Tim Pinto via email tpinto@esafetyoffice.co.uk

How Government uses your data

The pupil data that we lawfully share with the DfE through data collections:

- underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school;
- informs 'short term' education policy monitoring and school accountability and intervention, for example, school GCSE results or Pupil Progress measures;



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- supports 'longer term' research and monitoring of educational policy, for example, how certain subject choices go on to affect education or earnings beyond school.

Data collection requirement

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>

The National Pupil Data Base (NPD)

The NPD is owned and managed by the DfE and contains information about pupils in schools in England. This information is securely collected from a range of sources including schools, local authorities and awarding bodies. The data in the NPD is provided as part of the operation of the education system and is used for research and statistical purposes to improve, and promote the education and well-being of children in England.

The evidence and data provide the DfE, education providers, Parliament and the wider public with a clear picture of how the education and children's services sectors are working in order to better target, and evaluate policy interventions to help ensure all children are kept safe from harm and receive the best possible education. To find out more about the NPD, go to

<https://www.gov.uk/government/publications/national-pupil-database-npd-privacy-notice/national-pupil-database-npd-privacy-notice>

Sharing by the DfE

The DfE will only share pupils' personal data where it is lawful, secure and ethical to do so. Where these conditions are met, the law allows the DfE to share pupils' personal data with certain third parties, including:

- schools and local authorities;
- researchers;
- organisations connected with promoting the education or well-being of children in England;
- other government departments and agencies;
- organisations fighting or identifying crime.

For more information about the DfE's NPD data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

Organisations fighting or identifying crime may use their legal powers to contact the DfE to request access to individual level information relevant to detecting that crime.

For information about which organisations the DfE has provided pupil information, and for which project, or to access a monthly breakdown of data share volumes with the Home Office and Police, please visit the following website: <https://www.gov.uk/government/publications/dfE-external-data-shares>



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How to find out what personal information the DfE holds about you

Under the terms of UK-GDPR, you are entitled to ask the DfE:

- if they are processing your personal data;
- for a description of the data that they hold about you;
- the reasons they are holding it and any recipient it may be disclosed to;
- for a copy of your personal data and any details of its source.

If you want to see the personal data held about you by the DfE, you should make a 'Subject Access Request'. Further information on how to do this can be found within the DfE's personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

or

<https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>