**BRYNFORD PRIMARY**

**PRIVACY NOTICE**

**FOR PARENTS AND GUARDIANS**

|  |  |  |  |
| --- | --- | --- | --- |
| **Policy Number** | **Document Version** | **Date Reviewed** | **Date of Next Review** |
| YBGD14 | V3 | June 2019 | June 2020 |

**Categories of pupil information that we collect, hold and share include:**

Data collected from Parents:

* Personal information: Forename, Surname, date of birth, address, emergency contact information, parental responsibility, mode of transport, siblings and contact details of parents/guardians.
* Characteristics / Special Category Information: Ethnicity, language, nationality, country of birth, Religion, physical or mental health, medical conditions, allergies and gender – these are all required to complete our public task to educate and protect children.

**Data collected from elsewhere:**

* Attendance information - such as sessions attended, number of absences and absence reasons – this information is obtained from the parent and at pupil registration every morning.
* National curriculum assessment results – from the Welsh Government
* Special educational needs information, relevant medical information – from Parent’s, Local Authority, School Nurse, Teaching Staff.
* Pupil Information – When the pupil transfers from another school we receive pupil data from them.

# Collecting pupil information

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a consent basis. In order to comply with the General Data Protection Regulation, we will notify you whether the information is mandatory or if you are required to give explicit consent (either yes or no).

The school will, on an annual basis, send out individual Data Collection Sheets in order to ensure that our records are accurate and up to date. This is mandatory to ensure all information is correct and up to date.

We will also send other documents to you to complete such as collection of your information annually, pupil and parent agreements, acceptable use policy for the computers, home school agreement etc. These documents must be completed as they are required under the law to ensure your information is up to date and your child/ren are protected and safe whilst being educated. Some forms require your explicit consent where you can decide if you wish to agree or not. This consent can be withdrawn at any time.

**How we use pupil information.**

 We use the pupil data:

* As part of our admissions process.
* To provide Education and Support Services.
* To deliver mandatory tests.
* To support pupil teaching and learning.
* To monitor and report on pupil progress.
* To provide appropriate pastoral care.
* To assess the quality of our services.
* To comply with the law regarding data sharing.
* To enable access to our school meals and payments system.
* Administration – maintaining up to date records.

**We apply the following principles when using personal data.**

1. **Processed lawfully, fairly and in a transparent manner.**
2. **Collected for specified, explicit and legitimate purposes (‘purpose limitation’)**
3. **Adequate, relevant and limited to what is necessary.**
4. **Accurate and, where necessary, kept up to date.**
5. **Kept in a form which permits identification for no longer than is necessary.**
6. **Processed in a manner that ensures appropriate security of the personal data.**

 **Who do we share pupil information with?**

We routinely share pupil information with:

* Other schools or colleges that pupils attend before or after leaving us.
* Our local authority (Flintshire County Council).
* Welsh Government.
* Education training and Assessment bodies e.g Welsh Government.
* School Staff and the Governing Body – only when necessary with a specific purpose.
* Healthcare Professionals – School Nurse, Flintshire occupational services.
* Police Forces – When we have a legal requirement to disclose.
* Courts – When we have a legal requirement to disclose.

# Why we 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.

We share pupils’ data with the Welsh Government on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

To find out more about the data collection requirements placed on us by the Welsh Government (for example: PLASC go to):

<http://gov.wales/topics/educationandskills/schoolshome/schooldata>

# Transfers of Data

Information is not transferred out of the Country; however, information is stored on cloud servers based in the EU.

<https://www.gov.uk/eu-eea>

With Seesaw information is stored on cloud servers based in the USA, this storage is covered under the Privacy Shield, no information is shared, sold, accessed other than through the Teacher for Education purposes.

<https://studentprivacypledge.org/privacy-pledge/>

# Storing pupil information

Brynford Primary School keeps information about you on computer systems and also sometimes on paper.

All information is retained securely within the Local Authority Servers or on securely encrypted hardware.

All Information and documentation is retained only as long as it is necessary. Education Records are transferred to other schools if the pupil transfers school or leaves to attend high school. All information is retained in accordance with the IRMS toolkit for schools.

 [https://c.ymcdn.com/sites/irms.site-ym.com/resource/collection/8BCEF755-0353-4F66-9877- CCDA4BFEEAC4/2016\_IRMS\_Toolkit\_for\_Schools\_v5\_Master.pdf](https://c.ymcdn.com/sites/irms.site-ym.com/resource/collection/8BCEF755-0353-4F66-9877-%20%20%20%20%20%20%20%20%20%20CCDA4BFEEAC4/2016_IRMS_Toolkit_for_Schools_v5_Master.pdf)

 **Systems**

Access to the school’s IT and Data Systems is restricted to authorised individuals only and is underpinned and protected by our Online Safety and Acceptable Usage Policies. Access is logged and routinely monitored to protect users and the integrity and security of systems and data.

 We also have an electronic sign in system that complies with GDPR. This system ensures our safeguarding responsibilities continue, we have an accurate headcount of pupils, staff and visitors at all times. The only Information held on the electronic sign in system is name and class. Anyone previously signing in is invisible to the next person signing in. The manually uploaded Information is held on secure cloud storage servers in the UK.

<http://www.osbornetechnologies.co.uk/entrysign/?site=uk>

**Companies we have Processing Agreements with (Third Party Processors)**

* We have a processing arrangement with Parent Pay who are able to hold information for school meal purposes. This information is held on a secure computerised system and is accessed by the Secretary and parents through their own individual login but not shared.

<https://www.parentpay.com/parentpay-and-gdpr/>

* Pupil information is retained on our SIMS system (School Management Information System) procured by the Local Authority with a processors agreement and retained until the pupil leaves for high school at which time the data is transferred to the high school.

<https://www.capita-sims.co.uk/privacy-notice>

* Seesaw – A program provided via a managed App to securely store photographic and video evidence of pupil’s achievements in Oral and visual curriculum requirements within their education. No data other than name, class and the subject are uploaded.

<https://web.seesaw.me/privacy>

* Purple Mash – A self-contained program used to support pupils in developing digital, mathematical, literacy and other curriculum areas. All information held is uploaded from SIMS, only the pupil name and class are held.

<https://static.purplemash.com/mashcontent/applications/documents/terms_and_conditions//Purple%20Mash%20terms%20and%20conditions.pdf>

* Incerts / Assessment Foundation – A secure education program used to record and document children’s progress.

 <http://www.assessmentfoundation.org/blog.html?lang=en>

* Inspire Maths – A self-contained computer program developing on the workbooks utilized in School.

<https://global.oup.com/privacy?cc=gb>

All system backups are encrypted and are held in multiple, physically secure locations as part of the school’s disaster recovery plan.

There are strict controls on who can see your information. We will not share your data if you have advised us that you do not want it shared unless it is the only way we can make sure you stay safe and healthy, are legally required to do so, the organization we share with is registered with the Wales Accord on the sharing of personal data, or the data is required for operational purposes.

 <http://www.waspi.org/participating-organisations>

Paper records are held in lockable cabinets. All visitors to site have to sign in before their entry is authorised. Control to areas where records are stored is restricted – pupils and visitors are not permitted to access any such area unless required and under the supervision of a staff member.

**Requests for Information**

All recorded information held by the school may be subject to requests under the Freedom of Information Act 2000, and the General Data Protection Regulations. If you would like to submit a Freedom of Information Request / Subject Access Request, you can e-mail us at school. Subject Access Requests will be dealt with within one month (including weekends) of the date of receipt by the school. Please note that no charge is made for this information.

 Freedom of Information Requests will be dealt with within 20 working days unless further information is required at which point you will be notified. Please refer to our Freedom of Information Publication Scheme. Requests should be marked for the attention of Mrs N Prytherch and e-mailed to bfmail@hwbmail.net

# Your Rights

The Data Protection Act/GDPR recognises 8 rights. Please note that not all of your rights are absolute and we will need to consider your request upon receipt, dependent on the lawful basis of processing.

* The Right to be Informed.
* The Right of Access.
* The Right to Rectification.
* The Right to Erasure.
* The Right to restrict.
* The Right to Portability.
* The Right to Object.
* Rights over automated decision making and profiling. (This area is not applicable.)

For more information please click the link below:

<https://ico.org.uk/your-data-matters/>

# The lawful and legitimate interest reasons we collect and process Information.

We collect and use pupil information under the Education Act, additional Welsh Education Legislation, and the Children’s Act.

 We also comply with the Data Protection Legislation 2018 and the General Data Protection Regulation.

**Consent**

 When we request your explicit consent, you are able to agree or decline each element of the request. If you give your consent you can withdraw your consent in a letter to the school at any time.

 Explicit consent is used for certain areas of photographic consent. Website, School Publications, Media, Tempest Photography.

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 by contacting Mrs N Prytherch at the school bfmail@hwbmail.net or directly to the Information Commissioner’s Office at:-<https://ico.org.uk/concerns/>

 **Contact:**

If you wish to contact the School’s Data Protection Officer please contact:

Data Protection Officer

GDBR Consultancy LTD

David Bridge

david@gdbr.co.uk

If you wish to get in touch with the School’s Data Protection Contact:

Mrs N Prytherch

Brynford Primary School

Brynford

Holywell

Flintshire

CH8 8AD

Bfmail@hwbmail.net

If you wish to contact the Wales Information Commissioners Office:

Data.protectionofficer@gov.wales

Helpline Number: 029 20678400

Website: www.ico.gov.uk