The Wulfruna Partnership

DATA PROTECTION / GDPR PRIVACY NOTICE

For Pupils, Parents and Families

Who processes your information?

The Wulfruna Partnership is the data controller of the personal information you provide to school and to us. The trust and school are responsible for deciding how information you provide us with is used. We refer to your information as "personal data" and when we use your information in different ways, this is called "processing". The Data Protection Act 2018 (DPA) and the UK General Data Protection Regulation (GDPR) outline how personal data should be protected and used appropriately by organisations.

In some cases, your personal data will be shared with other people, organisations or companies. This sharing will only occur when there is a statutory or legal basis or with those who provide essential systems and services to school where we ensure that the same data protection standards are in place on a contractual basis. If sharing your information is not essential, we will always ask for your consent (permission) before this takes place unless the law requires us to do so.

The categories of pupil information that we process include:

- 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 information (such as court orders and professional involvement)
- Images (such as photographs and CCTV images)
- 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 Key Stage 1 and 2 and phonics results)
- Behavioural information (such as exclusions and any relevant alternative provision put in place)

Why do we collect and use your information?

We hold the 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 authorities and / or the DfE. We collect and use personal data in order to meet legal requirements and our public task duties and obligations set out in the UK GDPR and UK law, including those in relation to the following:

- Education Act 1996 & 2011
- The Education (Information About Individual Pupils) (England) Regulations 2013
- The Children Act 1989 & 2004
- Keeping Children Safe in Education Statutory Guidance

We process special category data on the conditions that processing is necessary for reasons of substantial public interest and explicit consent as set out in UK data protection law.

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 and remote 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 keep children safe (food allergies, or emergency contact details)
- To provide safe online learning
- To meet the statutory duties placed upon us for DfE data collections

Whilst the majority of the personal data you provide to the school is mandatory, some is provided on a voluntary basis. 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.

The categories of parent information that the school collects, holds and shares includes the following:

- Contact information, including addresses, phone numbers and email addresses of parents and/or any other emergency contacts
- Financial and meal management information, e.g. account and transactional information for school meals and eligibility for free school meals
- Information pertaining to home life where appropriate, e.g. where a pupil is identified as having a mental health issue or there are safeguarding concerns

How long is your data stored for?

Personal data relating to pupils and their families is stored in line with the Trusts GDPR Data Protection Policy and Records Management & Retention Policy.

In accordance with UK GDPR, the trust and school does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected.

We will also retain personal data in the form of images, registers and examples of work for the purposes of archiving and as a historical record of school life. This information may later be published in school literature, displays or external media. In this case, the personal data we retain will be proportionate and limited to what is necessary.

Will my information be shared?

The school is required to share pupils' data with the DfE on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring. We are required to share information about our pupils with the DfE under regulation 5 of The Education (Information about Individual Pupils) (England) Regulations 2013.

The National Pupil Database (NPD) is managed by the DfE and contains information about pupils in schools in England. The school is required by law to provide information about our pupils to the DfE as part of statutory data collections, such as the school census; some of this information is then stored in the NPD. The DfE may share information about our pupils from the NDP 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 DfE has robust processes in place to ensure the confidentiality of any data shared from the NDP is maintained.

To find out more about the NPD, go to https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information

The trust and schools do not share information about our pupils with anyone without consent unless the law, our contracts and policies allow us to do so. Please see Appendix A for details on who our schools routinely share pupils' information with.

Where can you find out more information?

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

For information about which organisations the Department of Education has provided pupil information, (and for which project), please visit the following website: https://www.gov.uk/government/publications/national-pupil-database-requests-recieved

To contact the DfE: https://www.gov.uk/contact-dfe

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

What are your rights?

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact our Data Protection Officer (see 'Contact' section below).

You also have the right to:

- ask us for access to information about you that we hold
- have your personal data rectified, if it is inaccurate or incomplete
- request the deletion or removal of personal data where there is no compelling reason for its continued processing
- restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

Where the processing of your data is based on your consent, you have the right to withdraw this consent at any time.

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

Contact

If you would like to discuss anything in this privacy notice, please contact: DPO@wulfrunapartnership.co.uk or by writing for the attention of the Data Protection Officer at The Wulfruna Partnership, Central Office, Bantock Primary School, Aston Street, Pennfields, Wolverhampton, WV3 0HY.

Revisions and last updated

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time.

Appendix A

The trust and its schools routinely shares pupils' information with:

Bantock Primary School

- Pupils' destinations upon leaving the school
- The Department of Education
- Other Government agencies (Ofsted)
- Wolverhampton Local Authority and its agencies (Social Services, Admissions & Appeals, SEND Team, LAC Team)
- Other Local Authorities (as needed)
- The NHS and other health professionals (School Nurses, Health Visitors, Speech & Language Service, Hearing Impairment Service, Paediatrics, Dental, Orthoptics, CAMHS, Occupational Therapy, Physiotherapy)
- Police forces, courts, tribunals (information sharing for legal process)
- Education Psychologists (LA Education Psychology Service)
- External Support Agencies (Welfare support, Inclusion and Behaviour Services, Fisher Family Trust, Base 25, Specialist Teaching Services)
- The providers of our management information system (Arbor, Wonde)
- The software we use to communicate with you (Arbor, Class DoJo)
- The system we use for managing visitors to school (InVentry)
- The providers of our CCTV system (School managed)
- Our virtual learning environments and learning platforms (Microsoft Sharepoint)
- The systems we use for recording progress in learning (Arbor, 2 Simple, Provision Tracker)
- The online software we use to help deliver the curriculum (Century Tech, Purple Mash, Times Tables Rock Stars, White Rose Maths & Science, MLS Library)
- The software we use to provide cashless payments (Arbor)
- The software we use to manage visits and health & safety (Evolve)
- Visit/trip providers
- Alternative Education Providers
- Professional advisors and consultants (LA School Improvement Team, Teaching Schools)
- Contract Catering Services (MiQuill)
- Contract Data Management Services (Services4Schools)
- Contract IT Support Services (Concero UK)
- The systems we use for active monitoring and filtering of online activities (Smoothwall)

The trust and its schools routinely shares pupils' information with:

Dovecotes Primary School

- Pupils' destinations upon leaving the school
- The Department of Education
- Other Government agencies (Ofsted)
- Wolverhampton Local Authority and its agencies (Social Services, Admissions & Appeals, SEND Team, LAC Team)
- Other Local Authorities (where required)
- The NHS and other health professionals (School Nurses, Health Visitors, Speech & Language Service, Hearing Impairment Service, Paediatrics, Dental, Orthoptics, CAMHS, Occupational Therapy, Physiotherapy)
- Police forces, courts, tribunals (information sharing for legal process)
- Education Psychologists (LA Education Psychology Service)
- External Support Agencies (Welfare support, Inclusion and Behaviour Services)
- The providers of our management information systems (Arbor, Wonde)
- The software we use to communicate with you (Arbor)
- The software we use to provide cashless payments (Arbor)
- Our Safeguarding system (CPOMS)
- The system we use for managing visitors to school (EntrySign)
- The providers of our CCTV system (School managed)
- Our virtual learning environments and learning platforms (Microsoft Sharepoint)
- The systems we use for recording progress in learning (PiXL)
- The online software we use to help deliver the curriculum (White Rose Maths & Science, Discovery Education, Times Table Rockstars, Junior Librarian, Seesaw, PiXL)
- The online software we use to help us manage visits and health & safety (Evolve / CHEMDOC) The providers of therapy and support services (e.g. Speech and language therapists, hearing and visual impairment support)
- Visit/trip providers
- Alternative Education Providers
- Professional advisors and consultants
- Contract catering services (MiQuill)
- Contract Data Management Services (Services4Schools)
- Contracted IT support services (Concero UK)
- The systems we use for active monitoring and filtering of online activities (Senso / Lightspeed)

The trust and its schools routinely shares pupils' information with:

Merridale Primary School

- Pupils' destinations upon leaving the school
- The Department of Education
- Other Government agencies (Ofsted)
- Wolverhampton Local Authority and its agencies (Social Services, Admissions & Appeals, SEND Team, LAC Team)
- Other Local Authorities (as needed)
- The NHS and other health professionals (School Nurses, Health Visitors, Speech & Language Service, Hearing Impairment Service, Paediatrics, Dental, Orthoptics, CAMHS, Occupational Therapy, Physiotherapy, Reflexions, Inspire)
- Police forces, courts, tribunals (information sharing for legal process)
- Education Psychologists (LA Education Psychology Service)
- External Support Agencies (Welfare support, Inclusion and Behaviour Services, Base 25, LT Learning, Light up, Black Country Womens Aid, The Well Food Bank, The Good Shepherd Food Bank, The Haven)
- The providers of our management information system (Arbor, Wonde)
- Our Safeguarding system (CPOMS)
- The software we use to communicate with you (Arbor)
- The system we use for managing visitors to school (Entrysign)
- Our virtual learning environments and learning platforms (Microsoft Sharepoint)
- The systems we use for recording progress in learning (Arbor, Insight)
- The online software we use to help deliver the curriculum (Times Tables Rock Stars, White Rose Maths & Science, Grammarsaurus, Number Stacks, Complete PE, Widget, Poetry Basket, RWI Spellings and Phonics, Test Base, Literacy Shed, Language Angels, Kinetic Letters, Doodle Maths and English, Calm Brain, Concept Cat)
- The software we use to provide cashless payments (Arbor)
- The software we use to manage visits and health & safety (Evolve)
- Visit/trip providers
- Alternative Education Providers
- Professional advisors and consultants (LA School Improvement Team, Teaching Schools)
- Contract Catering Services (MiQuill)
- Contract Data Management Services (Services4Schools)
- Contract IT Support Services (Concero UK)
- The systems we use for active monitoring and filtering of online activities (Smoothwall, Lightspeed)

The trust and its schools routinely shares pupils' information with:

Fallings Park Primary School

- Pupils' destinations upon leaving the school
- The Department of Education
- Other Government agencies (Ofsted)
- Wolverhampton Local Authority and its agencies (Social Services, Admissions & Appeals, SEND Team, LAC Team)
- Other Local Authorities (as needed)
- The NHS and other health professionals (School Nurses, Health Visitors, Speech & Language Service, Hearing Impairment Service, Paediatrics, Dental, Orthoptics, CAMHS, Occupational Therapy, Physiotherapy)
- Police forces, courts, tribunals (information sharing for legal process)
- Education Psychologists (LA Education Psychology Service)
- External Support Agencies (Welfare support, Inclusion and Behaviour Services, Base 25, Barnardos Womens Aid, Play Therapy)
- The providers of our management information system (Arbor, Wonde, CPOMS)
- The software we use to communicate with you (Arbor)
- The system we use for managing visitors to school (Entrysign/Net2)
- Our virtual learning environments and learning platforms (Microsoft Sharepoint)
- The systems we use for recording progress in learning (Arbor, 2 Simple, Provision Tracker)
- The online software we use to help deliver the curriculum (Times Tables Rock Stars, Oxford Owl, Numicon online, ELS Book Library, Cornerstones, Ed Shed, Flash Academy, GL Assessments, Language Angels, Learning with Parents, Orchard Digital, Now Press Play, Lyfta, Number Gym, Number Sense Maths, Spag, Third Space, Mr Bee Teach, My Mini Maths)
- The software we use to provide cashless payments (Arbor)
- The software we use to manage visits and health & safety (Evolve)
- Visit/trip providers
- Alternative Education Providers
- Professional advisors and consultants (LA School Improvement Team, Teaching Schools, Sensory Issues, SEN Occupational Therapist, Specialist Teacher)
- Contract Catering Services (MiQuill)
- Contract Data Management Services (Services4Schools)
- Contract IT Support Services (Concero UK)
- The systems we use for active monitoring and filtering of online activities (Smoothwall)