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Privacy Notice for **Parents and Pupils** – How we use your information 2025/26

Who are we?

Milverton Primary School is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Milverton Primary School is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: **ZA010039**.

You can contact the school as the Data Controller in writing at:
head@milvertonprimaryschool.co.uk

What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our pupils and parents.

What is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information relates to personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

What personal information do we process about pupils and parents?

The pupil and parent information that we collect, hold and share includes:

- Personal information including a pupil's name, date of birth, unique pupil number and home address
- Characteristics such as ethnicity, language, nationality, country of birth and free school meal eligibility
- Attendance information such as sessions attended, number of absences and absence reasons.
- Educational information including records of work, assessment results, relevant medical information, details of pupils' special educational needs, exclusions/behavioural information
- Contact information for parents, carers and other relatives, including telephone numbers, home addresses and e-mail addresses
- Parents payment details including payments made, debts incurred.
- Accident / incident reports involving the child
- Information about a child's home life, where required as part of necessary safeguarding and welfare processes.
- Images of children during their school day or in special activities
- Visitor Details
- Details of any support received, including care packages, plans, and support providers.
- We may also collect, use, store and share (when appropriate) information about your child that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to,

information about:

- Any medical conditions we need to be aware of, including physical and mental health
- Photographs and CCTV images captured in school

Why do we use personal information?

We use pupil personal data:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- To protect pupil welfare
- to assess the quality of our services
- to comply with the law regarding data sharing
- to safeguard pupils
- to share medical information with health professionals
- Administer admissions waiting lists
- Carry out research

Use of yours or your child's personal data for marketing purposes

- Where you have given us consent to do so, we may send you or your child marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to them.
- You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by contacting us (see 'Contact us' below).

Use of your child's personal data in automated decision making and profiling

- We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

Collecting pupil personal information

Whilst the majority of personal information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the UK General Data Protection Regulation, we will inform you whether you are required to provide certain personal information to us or if you have a choice in this.

Most of the data we collect in relation to parents and pupils will come direct from the parent or pupil. However, we may also hold data relating to you and/or your child that has come from:

- Local authorities
- Government departments or agencies
- Police force, courts, tribunals
- External support services

What are the legal reasons for us to process your personal information?

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. The lawful reasons we have for processing personal information are as follows:

1) To comply with the law

We collect and use general purpose pupil personal information in order to meet certain legal requirements and legal obligations placed upon the school by law. We therefore are required to process this personal information for such purposes even if you have not consented to us doing so.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

If you would like a copy of or further information regarding the statutory authorities that underpin our legal obligations, you should contact the school in writing.

2) To protect someone's vital interests

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information with is set out in Table 2.

3) With the consent of the individual to whom that information 'belongs'

Whilst much of the personal information processed is in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information with is set out in Table 3.

4) To perform a public task

It is a day-to-day function of the school to ensure that children receive the education and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that pupils are properly educated and supported

Details of the type of processing that we may undertake on this basis and who we may share that information with is set out in Table 4.

5) We have a legitimate interest

Occasionally we have reasons to process information which fall outside of our usual day-to-day school functions. Details of the type of processing that we may undertake on this basis are set out in Table 5.

Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

- 1) Explicit consent of the data subject
- 2) Processing relates to personal data which is manifestly made public by the data subject
- 3) Necessary for establishing, exercising or defending legal claims
- 4) Necessary for reasons of substantial public interest
- 5) Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
- 6) Necessary for archiving, historical research or statistical purposes in the public interest

The lawful reasons for each type of special category personal information data that we process is set out in the tables attached.

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

Who might we share your information with?

We routinely share pupil personal information with:

- Schools that the pupils attend after leaving us
- Warwickshire Local Authority
- The Department for Education (DfE)
- Local Public Health team

- ARBOR
- Athletics – 3P learning
- School Website Host - Weebly
- Visitor e reception book – mediabase direct
- MyQuil – Food provider
- Braiswick Photography
- Warwickshire Music Hub
- School Health (NHS, Compass)
- Emergency Services
- School Counsellor

We do not share information about our pupils or parents unless the law and our policies allow us to do so.

Please refer to the tables for information about what personal information is shared with which specific third parties.

Data collection requirements:

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

What do we do with your information?

All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected. The school monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

We have security measures in place to prevent yours and your child's information from being accidentally lost, used, or accessed in an authorised way, altered, or disclosed.

How long do we keep your information for?

In retaining personal information, the school complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the school are required to retain the information.

A copy of those schedules can be located using the following link:

<http://irms.org.uk/page/SchoolsToolkit>

Transferring data internationally

Where we transfer personal data to a country outside of the UK, we will do so with the appropriate safeguards in place in accordance with data protection law.

What are your rights with respect of your personal information?

Under data protection law, 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 to have access to your child's educational record, contact the School Data Protection Officer at Warwickshire Legal Services via email at schooldpo@warwickshire.gov.uk or alternatively;

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL

****Please ensure you specify which school your request relates to.**

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;

- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

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 or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Review

The content of this Privacy Notice will be reviewed **October 14th 2025**

Table 1 – Personal information we are required to process to comply with the law:

Information Type	Relevant legislation	Special Category–additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Child admissions information	Education Regulations 2006	Race / ethnic origin Health	ARBOR / Local Authority	Legal Obligation Registration
Child Attendance	Education Regulations 2006		ARBOR / Local Authority Child's new school	Legal Obligation Registration, attendance monitor
Common Transfer File	Education Regulations 2005	Race / ethnic origin Health	ARBOR / Local Authority Child's new school	Legal Obligation Transfer information
Curricular record	Education Regulations 2005		ARBOR / Local Authority Child's new school	Legal Obligation Registration, academic reporting
Educational Record	Education Regulations 2005	Race / ethnic origin Health	ARBOR / Local Authority	Legal Obligation Parental request Transfer information
Pupil information	Education Regulations 2013	Race / ethnic origin Health	ARBOR / Local Authority	Legal Obligation To allow LA to meet their statutory requirements
SEND Report	Children and Families Act 2014		ARBOR / Local Authority	Legal Obligation To allow LA to meet their statutory requirements
Attendance Information	Education Act 1996		ARBOR / Local Authority	Legal Obligation To allow LA to meet their statutory requirements
Education Supervision Orders	Children's Act 1989		ARBOR / Local Authority	Legal Obligation To allow LA to meet their statutory requirements
Exclusion	Education Act 2002		ARBOR / Local Authority	Legal Obligation To allow LA to meet their statutory requirements
Name, DOB, UPN, Gender, FSM eligibility, SEND, Medical information, address and assessment	Education Act 2005		ARBOR / Local Authority	Legal Obligation To allow Inspection
Pupil Information	Education Act 1996	Race / ethnic origin Health	ARBOR / Local Authority	Legal Obligation To allow LA to meet their statutory requirements
Qualifying Complaint	Education Act 2005		ARBOR / Local Authority	Legal Obligation To allow LA to meet their statutory requirements
Safeguarding and promoting welfare of pupils	Education Act 2002 Children Act 2004		ARBOR / Local Authority	Legal Obligation To allow LA to meet their statutory requirements
School Attendance Order	Education Act 1996		ARBOR / Local Authority	Legal Obligation To allow LA to meet their statutory requirements
Special Educational Needs	Education Act 1996	Race / ethnic origin Health	ARBOR / Local Authority	Legal Obligation To allow LA to meet their statutory requirements
Suitable Education	Education Act 1996		ARBOR / Local Authority	Legal Obligation To allow LA to meet their statutory requirements

Staff Information including personal details, dbs check, qualifications	Education Act 2005 Section 114		ARBOR / Local Authority	Legal Obligation To allow LA to meet their statutory requirements
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Table 2 – Personal information we are required to process as it is necessary to protect someone's vital interests

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Child medical / dietary information	Health	Emergency services	Vital Interests
<i>Religious belief</i>	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent'	<i>Medical staff i.e. paramedics/ambulance</i>	<i>Vital Interest</i>

Table 3 - Personal information we are required to process with the consent of the individual to whom that information 'belongs'

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Child Images and video		School Website Host – Weebly, School APP WEDUC	Consent
Child personal details, counselling notes		School Counsellor	Consent

Table 4 - Personal information we are required to process because it is necessary to do so in order to perform a public task

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Child personal details, name, age, year group, class group, dietary information, religious beliefs	Health - vital interest	Educaterors,	Public Task
Parent details		Group call, WAM booking system, WAM Payment system, School APP WEDUC, Visitor e reception book – mediabase direct	Public Task
Children's names and personal information		Mathletics – 3P learning, WAM booking system, WAM Payment system, Braiswick Photography, County Music, School APP WEDUC, Visitor e reception book – mediabase direct	Public Task
Visitor details		Visitor e reception book – mediabase direct	Public Task
Academic Progress data including Leuven data, wellcom data, Learning journals,		OFSTED, Parents, Health such as Speech and Language	Public Task & Legal Obligation

staff observations			
Safeguarding information, Medical, Special Education Needs		Local Authority, Health, Parents	Legal Obligation
Educational and Safeguarding Information used internally for the purpose of educating and protecting the welfare of children.			
Emergency contact details			Public Task
CCTV		Police	Public Task

Table 5 - Personal information we process because we have a legitimate interest. please note that the right to object will apply to **some** of this processing, please see the section above that refers to 'What are your rights with respect of your personal information?'

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Images captured on CCTV	n/a	This is not shared routinely Police	n/a