

## Privacy Notice

### General Data Protection Regulation (GDPR)

*This Privacy Notice has been written to inform parents and pupils of West Cliff Primary School about what we do with your personal information. This Notice may be subject to change as the Data Protection Bill progresses.*

#### Who are we?

West Cliff Primary School is part of the Yorkshire Endeavour Academy Trust. Yorkshire Endeavour Academy Trust is a 'Data Controller' as defined by Article 4 (7) of GDPR. This means that we determine the purposes for which, and the manner in which, your personal data is processed. We have a responsibility to you and your personal data and will only collect and use this in ways which are compliant with data protection legislation.

Yorkshire Endeavour Academy Trust has appointed a Data Protection Officer (DPO). The role of the DPO is to ensure that the schools are compliant with GDPR and to oversee data protection procedures.

Contact details are:

#### Data Protection Officer details

Sharon Markham  
Company Secretary  
Yorkshire Endeavour Academy Trust  
Airy Hill Primary School  
Waterstead Lane  
Whitby  
YO21 1PZ  
01947 606688  
Email: [companysecretary@yeat.co.uk](mailto:companysecretary@yeat.co.uk)

#### What information do we collect?

The personal data we collect about you includes:

- Personal identifiers and contact details, including name, postal address, email address, phone number, date of birth, and pupil number.
- Educational and assessment attainment, such as early years, phonics and national curriculum assessment results.
- Characteristics such as free school meal eligibility and language spoken.
- Attendance information, including sessions attended, reason and number of absences, and previous schools attended.
- Behavioural information, including exclusions and any relevant alternative provision put in place.
- Safeguarding information, including but not limited to court orders and professional involvement and support.

- Child in Need or Looked After status, including episodes of being looked after or a child in need, adoptions, young carer status, care leavers and outcome information.
- Healthcare and medical information such as doctor details, allergies, medication and dietary requirements.
- Photographs or video images, including CCTV footage if applicable at the school
- Information relating to school trips and extra-curricular activities.
- Records of communications and interactions we have with you, including telephone call recordings if applicable.
- Before and after school club attendance.
- Equality monitoring information, such as your ethnicity, religious beliefs, sexual orientation and gender.
- Biometric data e.g. thumbprints or facial recognition if applicable.
- Medical information relevant to pandemic management, such as your vaccination status and positive test results.
- E-monitoring information about your use of the school's network and IT systems.

## Why do we collect your personal data?

We use the information we collect:

- To support pupil learning.
- To meet our safeguarding obligation to pupils.
- To monitor and report on pupil attainment progress.
- To provide appropriate pastoral care.
- To assess the quality of our educational provision.
- To provide wraparound care before and after school where applicable.
- To meet the statutory duties placed upon us regarding DfE data collections.
- During a pandemic, to prevent the spread of infection and maintain adequate and safe pupil and staffing levels.
- To promote the school, including in newsletters, on the school website and social media platforms.

## What is our lawful basis for processing your information?

Under the UK GDPR, it is essential to have a lawful basis when processing personal information. We normally rely on the following lawful bases:

- Article 6(1)(a) – consent
- Article 6(1)(c) - legal obligation
- Article 6(1)(e) - public task



Where we are processing your personal data with your consent you have the right to withdraw that consent. If you change your mind or are unhappy with our use of your personal data, please let us know by contacting the Headteacher.

There may be occasions where our processing is not covered by one of the legal bases above. In that case, we may rely on Article 6(1)(f) - legitimate interests. We only rely on legitimate interests when we are using your data in ways you would reasonably expect.

Some of the information we collect about you is classed as special category data under the UK GDPR. The additional conditions that allow for processing this data are:

- Article 9(2)(a) – explicit consent
- Article 9(2)(g) - reasons of substantial public interest

The applicable substantial public interest conditions in Schedule 1 of the Data Protection Act 2018 are:

- Condition 6 - statutory and government purposes
- Condition 10 - preventing or detecting unlawful acts
- Condition 18 - safeguarding of children and vulnerable people

## Who do we obtain your information from?

Much of the information we process will be obtained directly from you (pupils and parents). We will also process information received from:

- Department for Education (DfE)
- Local Education Authority
- Previous schools attended

Other agencies working with the child/family, such as Police, Health Services etc.

## Who do we share your personal data with?

We routinely share pupil information with:

- Schools that the pupils attend after leaving us
- Local Education Authority
- Department for Education (DfE)
- National Health Service bodies

Youth support services, where relevant.

- Other agencies working with the child/family, where appropriate.
- Relevant examination/awarding bodies.
- School suppliers and IT applications, where necessary.
- Yorkshire Endeavour Academy Trust

For more information on information sharing with the DfE (including the National Pupil Database and Census) please go to: <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

We may also share information with other third parties where there is a lawful basis to do so. For example, we sometimes share information with the police for the purposes of crime detection or prevention. We also regularly share information with appropriate organisations for the purposes of arranging school trips.

### How long do we keep your personal data for?

We will keep your data in line with our Information Policy. Most of the information we process about you will be retained as determined by statutory obligations. Any personal information which we are not required by law to retain will only be kept for as long as is reasonably necessary to fulfil our organisational needs.

### International transfers of data

Although we are based in the UK, some of the digital information we hold may be stored on computer servers located outside the UK. Some of the IT applications we use may also transfer data outside the UK.

Normally your information will not be transferred outside the European Economic Area, which is deemed to have adequate data protection standards by the UK government. In the event that your information is transferred outside the EEA, we will take reasonable steps to ensure your data is protected and appropriate safeguards are in place.

### What rights do you have over your data?

Under GDPR parents and pupils have the following rights in relation to the processing of their personal data:

- to be informed about how we process your personal data. This notice fulfils this obligation
- to request access to your personal data that we hold, and be provided with a copy of it
- to request that your personal data is amended if inaccurate or incomplete
- to request that your personal data is erased where there is no compelling reason for its continued processing
- to request that the processing of your personal data is restricted
- to object to your personal data being processed

Please be aware that usually pupils are considered to have the mental capacity to understand their own data protection rights from the age of 12 years old. The school may therefore consult with a pupil over this age if it receives a request to exercise a data protection right from a parent.

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact our DPO on the address provided above.

If we cannot resolve your concerns you may also complain to the Information Commissioner's Office (the Data Protection Regulator) about the way in which the school has handled your personal data. You can do so by contacting:

First Contact Team



Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow Cheshire  
SK9 5AF  
[casework@ico.gsi.gov.uk](mailto:casework@ico.gsi.gov.uk) // 03031 231113

