



**The Federation of Wellington Community Primary School
and Marlborough Infant School**

Data Protection/ GDPR

Next Review Planned: September 2025

Signed: _____ (Policy Owner)

Print Name: _____

Review Date: _____

Signed: _____ (Governor Approval)

Print Name: _____

Approval Date: _____

[illegible]

1. Privacy Notice for Parents/Carers

Under data protection law, individuals have a right to be informed about how The Federation of Wellington Community Primary School and Marlborough Infant School uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' to individuals where we are storing and processing their personal data.

This privacy notice explains how we collect, store and use personal data about **students**.

We, The Federation of Wellington Community Primary School and Marlborough Infant School, are the 'data controller' for the purposes of data protection law. Our data protection officer is Victoria Hotham (see 'Contact us' below).

The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about students includes, but is not restricted to:

Contact details, contact preferences, date of birth, identification documents.

Results of internal assessments and externally set tests, including SAT data from primary schools. Student and curricular records such as timetables and intervention records.

Characteristics, such as ethnic background, eligibility for free school meals, or special educational needs.

Exclusion, and other behaviour information.

Information on rewards.

Details of any medical conditions, including physical and mental health.

Attendance information.

Safeguarding information.

Details of any support received, including care packages, plans and support providers.

Photographs and video.

CCTV images captured in school.

We may also hold data about students that we have received from other organisations, including other schools, local authorities and the Department for Education.

Why we use this data

We use this data to:

Support student's learning

Monitor and report on student progress

Provide appropriate pastoral care

Protect student welfare

Assess the quality of our services and general school outcomes Administer admissions and potential waiting lists

Carry out research internally and with third parties

Ensure the governing body has sufficient information to fulfil their leadership role. Comply with the law regarding data sharing

Our legal basis for using this data

We only collect and use students' personal data when the law allows us to. Most commonly, we process it where:

We need to comply with a legal obligation

We need it to perform an official task in the public interest

Less commonly, we may also process students' personal data in situations where:

We have obtained consent to use it in a certain way

We need to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use students' personal data, this consent can be withdrawn at any time.

We will make this clear when we ask for consent, and explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using students' personal data overlap, and there may be several grounds which justify our use of this data.

Collecting this information

While the majority of information we collect about students is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

How we store this data

We keep personal information about students while they are attending The Federation of Wellington Community Primary School and Marlborough Infant School. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. Our record retention schedule sets out how long we keep information about students.

A copy of the retention schedule is available upon written request from the DPO at The Federation of Wellington Community Primary School and Marlborough Infant School.

Data sharing

We do not share information about students with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about students with:

Our local authority (Hampshire County Council) - to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions

The Department for Education

The student's family and representatives Educators and examining bodies

Ofsted

Education supplies

Financial organisations linked to Hampshire County Council. Central and local government

Our auditors from Hampshire County Council

Survey and research organisations as appropriate.

Health authorities

Security organisations

Health and social welfare organisations

Professional advisers and consultants

Police forces,courts,tribunals

Professional bodies

National Pupil Database

We are required to provide information about students to the Department for Education as part of statutory data collections such as the school census in October and January of each academic year.

Some of this information is then stored in the [National Pupil Database](#) (NPD), which is owned and managed by the Department of Education and provides evidence on school performance to inform research.

The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The Department for Education may share information from the NPD with other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

For more information, see the Department's webpage on [how it collects and shares research data](#).

You can also [contact the Department for Education](#) with any further questions about the NPD. **Youth support services**

Once our students reach the age of 13, we are legally required to pass on certain information about them to Hampshire County Council, as it has legal responsibilities regarding the education or training of 13-19 year-olds.

This information enables it to provide youth support services, post-16 education and training services, and careers advisers.

Parents/carers, or students once aged 16 or over, can contact our data protection officer to request that we only pass the individual's name, address and date of birth to HCC.

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Parents and students' rights regarding personal data

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

Parents also have the right to make a subject access request with respect to any personal data the school holds about them.

If you make a subject access request, and if we do hold information about you or your child, we will:

Give you a description of it

Tell you why we are holding and processing it, and how long we will keep

it for Explain where we got it from, if not from you or your child

Tell you who it has been, or will be, shared with

Let you know whether any automated decision-making is being applied to the data, and any consequences of this such as assessment data and setting in a subject

Give you a copy of the information in an intelligible form.

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request please contact our data protection officer.

Parents/carers also have a legal right to access to their child's **educational record**. To request access, please contact the Headteacher at The Federation of Wellington Community Primary School and Marlborough Infant School.

Other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

Object to the use of personal data if it would cause, or is causing,
damage or distress Prevent it being used to send direct marketing

Object to decisions being taken by automated means (by a computer or machine,
rather than by a person)

In certain circumstances, have inaccurate personal data corrected, deleted or
destroyed, or restrict processing

Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

Report a concern online at

<https://ico.org.uk/concerns/> Call 0303 123

1113

Or write to: Information Commissioner's Office, Wycliffe House, Water Lane,
Wilmslow, Cheshire, SK9 5AF

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

Mrs V Hotham

2. Privacy Notice for Students

You have a legal right to be informed about how The Federation of Wellington Community Primary School and Marlborough Infant School uses any personal information that we hold about you. To comply with this, we provide a 'privacy notice' to you where we are processing your personal data.

This privacy notice explains how we collect, store and use personal data about you.

We, The Federation of Wellington Community Primary School and Marlborough Infant School, are the 'data

controller' for the purposes of data protection law. Our data protection officer is Victoria Hotham (see 'Contact

us' below).

The personal data we hold

We hold some personal information about you to make sure we can help you learn and look after you at school. For the same reasons, we get information about you from some other places too - like other schools, the local council and the government.

This information includes:

Your contact details

Your assessment, exam, SATs results

Your attendance records

Your behaviour data including exclusions and detentions

Your characteristics, like your ethnic background or any special educational needs Any medical conditions you have

Photographs and video

CCTV images

Why we use this data

We use this data to help run the school, including to:

Get in touch with you and your parents when we need to

Check how you're doing in exams and work out whether you or your teachers need any extra help Track how well the school as a whole is performing

Look after your wellbeing and make sure you are safe

Our legal basis for using this data

We will only collect and use your information when the law allows us to. Most often, we will use your information where:

We need to comply with the law

We need to use it to carry out a task in the public interest (in order to provide you with an education) Sometimes, we may also use your personal information where:

You, or your parents/carers have given us permission to use it in a certain way We need to protect your interests (or someone else's interest)

Where we have got permission to use your data, you or your parents/carers may withdraw this at any time.

We will make this clear when we ask for permission, and explain how to go about withdrawing consent.

Some of the reasons listed above for collecting and using your information overlap, and there may be several grounds which mean we can use your data.

Collecting this information

While in most cases you, or your parents/carers, must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data.

We will always tell you if it's optional. If you must provide the data, we will explain what might happen if you don't.

How we store this data

We will keep personal information about you while you are a student at The Federation of Wellington Community Primary School and Marlborough Infant School. We may also keep it after you have left the school, where we are required to by law.

We have a record which sets out how long we must keep information about students and how it is disposed.

Data sharing

We do not share personal information about you with anyone outside the school without permission from you or your parents/carers unless the law and our policies allow us to do so.

Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you with the above external bodies listed above.

National Pupil Database

We are required to provide information about you to the Department for Education (as part of data collections such as the school census).

Some of this information is then stored in the [National Pupil Database](#), which is managed by the Department for Education and provides evidence on how schools are performing. This, in turn, supports research.

The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards and others.

Youth support services

Once you reach the age of 13, we are legally required to pass on certain information about you to Hampshire County Council, as it has legal responsibilities regarding the education or training of 13-19 year-olds.

This information enables it to provide youth support services, post-16 education and training services, and careers advisers.

Your parents/carers, or you once you're 16, can contact our data protection officer to ask us to only pass your name, address and date of birth to

Transferring data internationally

Where we share data with an organisation that is based outside the European Economic Area, we will protect your data by following data protection law.

Your rights

How to access personal information we hold about you

You can find out if we hold any personal information about you, and how we use it, by making a '**subject access request**', as long as we judge that you can properly understand your rights and what they mean.

If we do hold information about you, we will:

Give you a description of it

Tell you why we are holding and using it, and how long we will keep

it for Explain where we got it from, if not from you or your parents

Tell you who it has been, or will be, shared with

Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)

Give you a copy of the information

You may also ask us to send your personal information to another organisation electronically in certain circumstances. If you want to make a request please contact our data protection officer.

Your other rights over your data

You have other rights over how your personal data is used and kept safe, including the right to:

Say that you don't want it to be used if this would cause, or is causing, harm or

distress Stop it being used to send you marketing materials

Say that you don't want it used to make automated decisions (decisions made by a computer or machine, rather than by a person)

Have it corrected, deleted or destroyed if it is wrong, or restrict our use of it

Claim compensation if the data protection rules are broken and this harms you in some way

Complaints

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we've done something wrong. You can make a complaint at any time by contacting our data protection officer.

Report a concern online at

<https://ico.org.uk/concerns/> Call 0303 123

1113

Or write to: Information Commissioner's Office, Wycliffe House, Water Lane,
Wilmslow, Cheshire, SK9 5AF

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer: Mrs V Hotham.

3. Privacy Notice for staff

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our school.

We, The Federation of Wellington Community Primary School and Marlborough Infant School, are the 'data controller' for the purposes of data protection law. Our data protection officer is Victoria Hotham (see 'Contact us' below).

The personal data we hold

We process data relating to those we employ, or otherwise engage, to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details

- Date of birth, marital status and gender

- Next of kin and emergency contact numbers

- Salary, annual leave, pension and benefits information

- Bank account details, payroll records, National Insurance number and tax status information

- Recruitment information, including copies of right to work documentation, references and other information included in your application letter for The Federation of Wellington Community Primary School and Marlborough Infant School or as part of the application process

- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships

- Performance information

- Outcomes of any disciplinary and/or grievance

- procedures Absence data

- Copy of driving

- licence

- Photographs

- CCTV footage

- Data about your use of the school's information and communications system

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and

- political opinions Trade union membership

- Health, including any medical conditions, and sickness records

Why we use this data

The purpose of processing this data is to help us run the school, including to:

Enable you to be paid

Facilitate safe recruitment, as part of our safeguarding obligations

towards pupils Support effective performance management

Inform our recruitment and retention policies

Allow better financial modelling and future planning Enable ethnicity and disability monitoring

Improve the management of workforce data across the sector Support the work of the

School Teachers' Review Body

Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

Fulfil a contract we have entered into with you

Comply with a legal obligation

Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

You have given us consent to use it in a certain way

We need to protect your vital interests (or someone else's interests)

We have legitimate interests in processing the data - for example, where additional resources are required to ensure your safety and adapted work environment.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

Collecting this information

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

How we store this data

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment. It can only be accessed by the headteacher and bursar.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our record retention schedule.

Any member of staff may request access to his or her files upon written request to the headteacher. Access to the fold is under supervision by either the bursar or DPO.

Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with the above parties.

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Your rights

How to access personal information we hold about you

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

Give you a description of it

Tell you why we are holding and processing it, and how long we will keep it for

Explain where we got it from, if not from you

Tell you who it has been, or will be, shared with

Let you know whether any automated decision-making is being applied to the data, and any consequences of this

Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our data protection officer.

Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

Object to the use of your personal data if it would cause, or is causing, damage or distress
Prevent your data being used to send direct marketing

Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)

In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing

Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer – Victoria Hotham.

Alternatively, you can make a complaint to the Information Commissioner's Office:

Report a concern online at

<https://ico.org.uk/concerns/> Call 0303

123 1113

Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

DPO: Victoria Hotham