

Graiseley Primary School



Privacy notice September 2025

Approved 24/09/2025

Graiseley Primary School Privacy Notice

This privacy notice tells you what to expect us to do with your personal information.

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Contact details

Post: Graiseley Primary School, Graiseley Hill, WOLVERHAMPTON, , WV2 4NE, GB

Telephone: 01902 558745

Email: graiseleyprimaryschool@wolverhampton.gov.uk

What information we collect, use, and why

We collect or use the following information **for student education and welfare**:

- Names and contact details for students/children
- Names and contact details for parents, guardians, carers
- Gender
- Pronoun preferences
- Date of birth
- Next of kin and emergency contact information

- Dietary requirements (including vegetarian, vegan, gluten free and religious requirements)
- Financial information including transactions
- Special Educational Needs and Disabilities (SEND) or additional support information (includes reasonable adjustments and special educational needs and disabilities)
- Welfare information (includes family and home life circumstances and history)
- Details of any criminal convictions
- Photographs
- Attendance and reason for absence data
- Account access information
- Exam results and qualifications
- Progress reports
- Information relating to compliments and complaints
- Exclusion, suspension and behavioral information
- Right to work information

We also collect or use the following special category information **for student education and welfare**. This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information

We collect or use the following information **for disciplinary investigations or to prevent, detect, investigate or prosecute crimes**:

- Names and contact details for students/children
- Names and contact details for carers

- Gender
- Pronoun preferences
- Welfare information (includes family and home life circumstances and history)
- Special Educational Needs and Disabilities (SEND) information (includes reasonable adjustments and special educational needs and disabilities)
- Details of any criminal convictions
- Attendance and reason for absence data
- Witness statements and contact details
- Records and reports
- Video recordings of public areas (including entrances and outside spaces to which some or all members of the public have access)
- Audio recordings of public areas (including entrances and outside spaces to which some or all members of the public have access)
- Video recordings of student access areas (including classrooms, corridors, canteens and outside spaces to which students have access)
- Audio recordings of student access areas (including classrooms, corridors, canteens and outside spaces to which only staff have access)
- Call recordings

We also collect or use the following special category information **for disciplinary investigations or to prevent, detect, investigate or prosecute crimes**. This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information

We collect or use the following personal information for **dealing with queries, complaints or claims**:

- Names and contact details
- Addresses
- Payment details
- Account login or user information
- Purchase or service history
- Video recordings of public areas
- Audio recordings of public areas
- Video recordings of private or staff only areas
- Audio recordings of private or staff only areas
- Call recordings
- Witness statements and contact details
- Relevant information from previous investigations
- Financial transaction information
- Information relating to health and safety (including incident investigation details and reports and accident book records)
- Correspondence
- Special Educational Needs and Disabilities (SEND) or additional support information (includes reasonable adjustments and special educational needs and disabilities)
- Attendance and reason for absence data

We also collect the following special category information for **dealing with queries, complaints or claims**. This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Religious or philosophical beliefs

- Health information

We collect or use the following information **for recruitment purposes**:

- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Copies of passports or other photo ID
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Details of any criminal convictions (eg DBS, Access NI or Disclosure Scotland checks)
- Security clearance details (eg basic checks and higher security clearance)

We also collect or use the following special category information **for recruitment purposes**. This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Trade union membership
- Health information

We collect or use the following information **to comply with legal requirements**:

- Identification documents
- Health and safety information
- Criminal offence data (including Disclosure Barring Service (DBS), Access NI or Disclosure Scotland checks)

- Safeguarding information
- Any other personal information required to comply with legal obligations

We also collect or use the following special category information **to comply with legal requirements**. This information is subject to additional protection due to its sensitive nature:

- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access](#).
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification](#).
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure](#).
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing](#).
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing](#).

- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability.](#)
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent.](#)

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information **for student education and welfare** are:

- **Consent** - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- **Contract** - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- **Legal obligation** - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- **Legitimate interests** – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Keeping the children safe, if we know what their dietary requirements are we will be able to make sure they do not have any food that they cannot eat or are allergic to.
 - Having the personal details of parents so that we can contact them if their child has had an incident.

- SEND information is collected and used when needed so that we can give the children further help if they require it.
- Marketing school events to parents or alumni (e.g., newsletters, fund-raising) if a parent has signed up for any newsletters then we need their information to be able to send out the newsletter.
- Fraud prevention or safeguarding, so that we can keep the children safe.
- Use of third-party platforms for educational enhancement, provided the impact is minimal and expected.
- Disclosing data to third parties (e.g., school photographers or clubs), if justified and proportionate.
- School photography, using pupil photos internally, this means we will need the child's personal data for identification or safeguarding purposes, where consent is impractical and the privacy impact is low.
- Behavioral analytics: Using anonymized data to improve teaching strategies or identify learning gaps to make sure the children get the best education possible.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests - collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task - we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information **for disciplinary investigations or to prevent, detect, investigate or prosecute crimes** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - The processing is necessary to uphold school rules, maintain order, and ensure safety, protecting pupils, staff, and property.
 - We have a genuine interest in investigating misconduct (e.g., bullying, vandalism, cheating). This could include, collecting witness statements, reviewing CCTV footage, accessing communication logs (e.g., emails or messages on school platforms)
 - Reporting incidents to law enforcement.
 - The data subject (usually the pupil) would reasonably expect such processing in the context of school discipline.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests - collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Public task - we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information for **dealing with queries, complaints or claims** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we’re collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We may need to investigate and respond to a concern raised by a parent, pupil, or staff member.
 - The processing is necessary to defend against legal claims or to resolve disputes.
 - The school is acting to improve its services or learn from feedback. This includes:
 - Responding to subject access requests or other data rights requests.
 - Investigating data breaches or safeguarding concerns.
 - Handling disciplinary or behavioral complaints
 - Managing parental disputes or bullying claims.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests - collecting or using the information is needed when someone’s physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of

your data protection rights may apply, except the right to object and the right to portability.

- Public task - we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Our lawful bases for collecting or using personal information **for recruitment purposes** are:

Our lawful bases for collecting or using personal information **to comply with legal requirements** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Contract - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legal obligation - we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - Our legitimate interests will always be in line with the legislation.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests - collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

- Public task - we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours. All of your data protection rights may apply, except the right to erasure and the right to portability.

Where we get personal information from

- Directly from you
- Regulatory authorities (eg HMRC)
- Parents or carers
- Local authorities or local councils
- Social services
- Other education establishments
- Health care providers
- CCTV footage or other recordings
- Publicly available sources
- Market research organisations
- Providers of marketing lists and other personal information
- Suppliers and service providers
- Professional consultants
- Third parties:
 - In cases of incidents where the police have been involved we may need to keep in touch with them as they may be able to enlighten us about a particular situation so that we will be able to address people and solve the problem accordingly on our side.
- Applications from employees. We will also get the information from new starter application forms when a parent wants to enroll their child at our school.

How long we keep information

We keep personal data for set minimum time periods, after which they are reviewed, passed on to the next school or securely destroyed. We do this in line with legislation affecting education records and schools.

Who we share information with

[Insert information about joint controllers here if necessary.]

Data processors

Microsoft

Parent pay – Sims, FMS, School comms

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This data processor does the following activities for us: Receive and process data needed for the software systems used for the running of the school

Others we share personal information with

- Parents and carers
- Local authorities
- Social services
- Pupil Referral Units (PRU's) or Education Otherwise at School Centres (EO-TAS)
- Specialist teachers such as peripatetic workers or speech and language therapists
- School governing bodies (such as Board of governors or Parent/teacher associations (PTA))
- Examination boards and bodies
- Health care providers
- Organisations we need to share information with for safeguarding reasons

- Emergency services
- Legal bodies or authorities
- Relevant regulatory authorities
- External auditors or inspectors
- Organisations we're legally obliged to share personal information with
- Publicly on our website, social media or other marketing and information media
- Previous employers
- Suppliers and service providers
- Professional consultants

How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

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September 2025