Privacy Notice for Pupils, Parents and Families

What is a Privacy Notice?

The Data Protection Act 2018 gives everyone the right to be informed about how their information is used by organisations. This Privacy Notice explains how Shine Academies Trust (Busill Jones Primary School, Crowmoor Primary School, Lodge Farm Primary School, Martin Wilson Primary School, Northwood Park Primary School, Villers Primary School) use information about pupils who attend our schools and their parents or carers. If you can be identified from the information we hold, then this is known as “personal data”.

This Privacy Notice explains:

- why we use your personal data
- the reasons we need to do this
- what kinds of personal data we use
- where we collect your personal data from
- who we will share your personal data with
- Your information rights
- who to contact if you need more information or have a concern

The Personal Data We Hold

We use personal information about pupils and their families for the purposes of delivering teaching and learning, undertaking our duties in relation to safeguarding and so that the school can perform other duties it is required to do so.

For the same reasons, we collect and share information about pupils and their families from other organisations, like previous schools, Local Authority services, or government departments.

The pupil information we need to use includes:

- Identifier (names) and contact details
- Pupil progress, attainment other information about tests or exams
- Attendance and absence information, including reasons for absence
- Details of behaviour issues, welfare support, or educational needs
- Photographs and video images
- CCTV images captured on school premises

The parent/family information we need to use includes:

- Identifier (names) and contact details (home address, phone numbers and email addresses)
- National insurance numbers (to check for school meals eligibility)
- Preferences for how we use your child’s information outside of school

We may also collect, use, store and share (when necessary) more sensitive information about pupils that falls into ‘special categories’. This includes:

- Characteristics and identity information, like gender, ethnic background and religion,
- Special educational needs, disabilities or additional educational needs
- Medical conditions or allergies
- Safeguarding, pastoral support and wellbeing information

Why We Use Personal Data for Pupils and Their Families

We use the information we hold about you to:

- Send important information or get in touch with you when we need to
- Deliver teaching and learning to our pupils
- Undertake our legal duties in relation to safeguarding and wellbeing
- Encourage positive behaviour
- Help keep pupils safe (including when learning online)
- Helping pupils prepare for and sit assessments and other tests
- Provide pupils and their families with access to lesson information, homework and other information about the curriculum we offer
- Support pupils and their families with any additional learning needs or disabilities
- Provide access to other organisations that offer specialist support
- Provide access to other learning opportunities outside of school
- Monitor the school and Trust's performance
- To help assess entitlement for additional support (for example Free School Meals)

Our Legal Basis for Using Your Data

When an organisation uses personal data, they need to explain why this is necessary. This is referred to as "the lawful basis" for processing.

At Shine Academies Trust, we use your information where:

- We need to comply with the education law that all schools must follow and safeguarding legislation, designed to keep pupils safe.
    - This includes the Education Act 1996, Section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013, and Keeping Children Safe In Education 2025
- We need to use it to carry out a task in the public interest (our duty to provide pupils with an education)

Sometimes, we may also use your personal information where:

- Parents/carers of have given us permission to use this for a particular purpose
- We have assessed that using information for a particular purpose is in your best interests and it is fair and reasonable to do this
- It is necessary to use your information for emergency purposes, where not doing so would put you at significant risk

Where we are using pupil parent data because we have gathered your permission (consent), you may withdraw or amend these preferences 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 Your Personal Data

Most of the information we collect about pupils and their families is mandatory (you must provide this information, so we are able to support your child in school), however, there are some occasions when you can choose whether or not to provide the data.

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

Most of the personal data we hold about pupils is provided by parents/carers. We may also collect pupil information from:

- Previous schools
- Local Authorities
- Government departments or agencies
- Police forces, courts or other official bodies
- Other professionals involved in the statutory assessment of pupil needs
- Providers of services you have consented to support pupils

How We Store Your Personal Data

We will keep personal information about pupils and their families while children are registered at our school. When a pupil leaves a Shine Academies Trust school, this information is usually transferred to the next school they attend.

We have a records management policy and retention schedule which sets out how long we must keep information about pupils. This document is published on the Trust website, and can be viewed following this link: https://www.shineacademies.co.uk/gdpr

We have security measures in place to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it.

Data Sharing

We do not share your personal information outside school without your permission, unless the law and our policies require us to do so.

We may share personal information about you with:

- The Local Authority (Wolverhampton Local Authority, Walsall Local Authority, Shropshire Local Authority) – to meet our legal responsibilities, such as sharing concerns about pupil safety and wellbeing, or sharing the choices secondary school pupils make about going into further education, employment, or training. We have an information sharing agreement with the Local Authority that supports how we share this information
- The Department for Education (a government department) – to meet legal obligations we have as a school
- With designated parent/family contacts – to share information about your child's academic progress, wellbeing, behaviour and details of how we may support other needs they have
- Awarding bodies – where pupils are entered as a candidate for statutory tests and public exams
- Our regulator (the organisation or "watchdog" that supervises us), Ofsted – they inspect and regulate services that care for children and young people, and services providing education and skills for learners of all ages
- Suppliers of the IT systems pupils and staff use in school – including our central pupil information system (ScholarPack) and other essential systems we connect to this (Marvellous Me, Teachers 2 Parents)
- Our Safeguarding system (CPOMS)
- Suppliers of services that work with pupils in school – like sports coaches, therapists, counsellors, etc
- External Support Agencies (Welfare support, Inclusion and Behaviour Services)

- Providers of the systems we use to deliver our curriculum – so pupils can access learning online (Education Shed, Jigsaw PSHE, Maths Circle, Cornerstones, Nubridge Publishing, Kapow, Marvellous Me, Sing up, Grammarsaurus, White Rose Maths, Purple Mash, Squirrel Learning, Wandle Learning, 2 Simple, Spag.com)
- Our firewall, filtering and monitoring systems - to safeguard pupils from potentially harmful and inappropriate online material (Senso)
- The finance systems we use for online payments – to enable parents to pay for services such as school meals, trips and other events (Parent Pay)
- The Local Authority (Wolverhampton Local Authority, Walsall Local Authority, Shropshire Local Authority) – Where we receive services such as free school meals eligibility checks
- Our auditors – they inspect how we manage our finances and other school standards
- Survey and research organisations- to enable us to provide the most appropriate learning opportunities for our pupils
- Health Authorities – School Nurses and other NHS organisations that attend our schools to provide pupils with immunisations and advice on health
- Health and social welfare organisations – GPs, Hospitals, Children's Services, Education Psychology Service who look after pupil's medical and social needs
- Professional advisers and consultants – who may provide specialist informal, advice and guidance to staff or to parents
- Charities and voluntary organisations – to provide specialist information, advice and guidance to staff or to parents
- Police, Courts, Legal tribunals, Insurance Underwriters – who may require information to complete official or regulatory duties
- The system we use for managing visitors to school (Entrysign)
- The providers of our CCTV systems (Chubb, ADT)
- Contract catering services (ABM Catering)
- Contracted IT support services

National Student Database

We are required to provide information about our pupils to the Department for Education (a government department) 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.

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

You can find more information about this on the Department for Education's webpage on how it collects and shares research data.

You can also contact the Department for Education if you have any questions about the database.

Making Choices About Your Personal Data (consent)

If you have given consent for your child's personal data to be used for a particular purpose (for example, preferences relating to the use of your child's image on our website), you can amend or withdraw your consent at any time.

To change your consent preferences, you can contact your child's individual school. Contact details can be found at:

https://www.shineacademies.co.uk/ourschools

Where parents have given consent to receive email or text messages promoting school events, campaigns, charitable causes or services that you might be interested in, you can also withdraw or 'opt out' by clicking on the 'Unsubscribe' link at the bottom of the message, or by contacting us by using the details in the "Who to Contact" section of this privacy notice.

Transferring Data Internationally

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

Your Information Rights

Data Protection law provides you with certain rights.

Requesting access to your personal data

You (or your parent) have the right to request access to information about you that we hold.

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

To make a request to access your personal information, please contact our Data Protection Officer using the details in the "Who to Contact" section.

We may require you to provide proof of your identity, before we can help with your request.

Your Other Information Rights:

- **The right to know how your information is being used** – We uphold this by publishing Privacy Notices and letting you know how your information will be used when we collect it.
- **The right to have inaccurate information amended** - We uphold this right by asking your to review the information we hold on record and updating information if you provide evidence to show it has changed
- **The right to have information removed or deleted from your records** – We uphold this right by removing or deleting your information that we are no longer required to keep
- **The right to temporarily restrict how your information is used** - We uphold this right by not using information until we have confirmed what is accurate, unless it is necessary to do so
- **The right to object to us using your data for certain purposes** – We uphold this by asking for your consent or permission to use your information for these purposes (including direct marketing and for scientific/historical research and statistics)
- **The right for important decisions about you not to be made solely by automated systems that use your information (like computer algorithms and AI**) – We uphold this right by letting you know if these systems are used and giving you a choice for these types of decisions to be reviewed.

Who to Contact

Shine Academies Trust has a Data Protection Officer (provided by Services 4 Schools Ltd). Their role is to oversee and monitor our data protection procedures, and to make sure we are compliant with data protection legislation.

The Data Protection Officer is also responsible for helping pupils and their parents uphold their information rights.

If you would like to discuss anything in this privacy notice, please contact our Data Protection Officer:

Email: DPO@shineacademies.co.uk

In writing: **For the attention of the Data Protection Officer**
Shine Academies Trust,
Offices 088 & 089
East Wing
Wolverhampton
Science Park
Glaisher Drive
WV10 9RU

Complaints or Concerns

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.

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with our Data Protection Officer in the first instance. You can also raise a concern with the Information Commissioner's Office at https://ico.org.uk/concerns/

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

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.

This version was last updated **September 2025**

Google Analytics and Website Analytics

Crowmoor Primary School uses Google Analytics 4 ("Google Analytics"), a website analytics service provided by Google, to help us understand how visitors use our website and to improve the information, accessibility and experience we provide.

What information is collected?

If you choose to allow analytics cookies, Google Analytics may collect information about how you interact with our website, including:

- the pages you visit;
- how long you spend on pages;
- how you arrived at our website;
- links and website features you interact with;
- your general geographic area;
- the type of device, browser and operating system you use; and
- information about how you move between pages on our website.

Google Analytics uses cookies and similar technologies to distinguish between visitors and website sessions. These identifiers are pseudonymous and are not intended to directly identify you.

We do not intentionally send names, email addresses, pupil information or other directly identifiable personal information to Google Analytics.

For visitors in the UK, Google states that IP addresses are used briefly to derive general location information and are discarded before the IP address is logged or stored by Google Analytics.

Why do we use this information?

We use analytics information to understand how our website is being used and to help us:

- identify which pages and information are most useful to visitors;
- understand how people navigate around the website;
- identify technical or accessibility problems;
- understand which types of devices are being used to access the website; and
- improve the structure, content and performance of the website.

We do not use Google Analytics to make decisions about individual pupils, parents, carers, staff or other website visitors.

We do not use Google Analytics information for behavioural advertising or to build advertising profiles of visitors.

Our lawful basis

Where Google Analytics involves the processing of personal information, we rely on your **consent under Article 6(1)(a) of the UK GDPR**.

Analytics cookies will not be placed on your device unless you have chosen to allow them through our cookie controls.

You can refuse analytics cookies without this affecting your ability to use the school website.

You can also change or withdraw your consent at any time using the **Cookie Settings** option available on our website.

Google Analytics cookies

Google Analytics may use cookies including:

_ga
Used to distinguish website visitors. This cookie may remain on your device for up to two years unless it is deleted earlier.

_ga_[identifier]
Used to maintain information about a website session. This cookie may remain on your device for up to two years unless it is deleted earlier.

Cookie durations may be shortened by browser restrictions or by the settings we apply to Google Analytics.

How long do we keep analytics information?

We only retain analytics information for as long as is reasonably necessary to understand and improve the performance of our website.

We have configured Google Analytics to limit the retention of user-level analytics information wherever reasonably possible.

Aggregated statistical reports, which do not identify individual website visitors, may be retained for longer so that we can compare website performance over time.

Sharing information with Google

Google processes analytics information on our behalf in order to provide the Google Analytics service.

Information may be processed by Google and its service providers outside the United Kingdom. Where personal information is transferred internationally, appropriate safeguards are required in accordance with UK data protection law.

You can find further information about how Google uses information from websites that use its services in Google's privacy information.

Your choices

You do not have to allow analytics cookies.

When you first visit our website, you will be given the option to:

- **Accept analytics cookies**
- **Reject analytics cookies**
- **Manage your cookie preferences**

If you reject analytics cookies, Google Analytics will not be permitted to store analytics cookies on your device.

You can change your choice at any time by selecting **Cookie Settings** on our website.

For further information about how Crowmoor Primary School handles personal information, or to exercise your data protection rights, please contact:

Data Protection Officer, Shine Academies Trust
Email: DPO@shineacademies.co.uk
In writing: For the attention of the Data Protection Officer, Shine Academies Trust, Offices 088 & 089, East Wing, Wolverhampton Science Park, Glaisher Drive, WV10 9RU.

Google Analytics and Website Analytics section added 2 October 2026.