



Furze Field Primary School

Be kind, be respectful, be resilient. Aspiration and opportunity for all.

Privacy Notice (How we use pupil information)

STATUTORY

Owner:	SBM
Governor's Committee:	Full Governing Body
Last reviewed:	Spring 2024
Next review due:	Spring 2025

1. Introduction

We collect and use personal information about pupils so that we can operate effectively as a school.

This privacy notice explains how we collect, store and use (i.e. process) pupils' information, as well as what rights pupils have in relation to our processing of their information.

If you would like to discuss anything in this privacy notice at any time, please contact:

School Lead:	Gill Potter, School Business Manager
Data Protection Officer:	Nicola Cook, Schools DPO Ltd nicola@schoolsdp.com 01296 658502

2. The categories of pupil information we process includes:

- **Personal identifiers and contacts**, such as name, unique pupil number, contact details and address, identification documents, photographs
- **Characteristics**, such as ethnicity, language, pupil premium and free school meal eligibility
- **Attendance information**, such as sessions attended, number of absences and reasons, any previous schools attended
- **Assessment and attainment**, such as key stage 1 and phonics results
- **Medical and administration**, such as child health, dental health, allergies, medication and dietary requirements, doctor's information
- **Special educational needs**, including details of the needs and ranking
- **Behavioural information**, such as behavioural incidents, exclusions and any alternative provision put in place
- **Safeguarding information**, such as court orders, professional involvement
- **Additional educational activity information**, such as involvement in school trips, after school clubs, sporting events.

3. Why we collect and use pupil information

The personal information we collect and use is essential for us to operate effectively as a school and meet our legal obligations.

We collect and use pupils' personal information for the following purposes:

- a. To support pupil learning
- b. To monitor and report on pupil attainment and progress
- c. To provide appropriate pastoral care
- d. To protect the welfare of pupils and others in our school
- e. To meet our legal obligations
- f. To administer school admissions
- g. To run our school safely and effectively
- h. To assess the quality of our services
- i. To keep children safe (food allergies, or emergency contact details)
- j. To meet the statutory duties placed upon us for the Department for Education (DfE) data collections

4. Collecting pupil information

We collect pupil information via registration forms or Common Transfer Files (CTF) or secure file transfer from another school and keep this updated as necessary.

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this.

5. Storing pupil information

A significant amount of personal information is stored electronically, e.g. in our management information database and curriculum network. Some information may also be stored in hard copy format in lockable cabinets.

We hold pupil data securely for the set amount of time shown in our data retention schedule. For a copy of our data retention schedule, please contact the school lead (details on page 1).

6. Who we share pupil information with

We routinely share pupil information with:

- Schools that pupils attend after leaving us
- Our local authority to support it in meeting its statutory duties, e.g. school admissions, Connecting Care (see Appendix One for information on 'Connecting Care')
- Department for Education (DfE), e.g statutory data collections (see Appendix Two for information on how the DfE uses pupils' information)
- Companies providing services to our school, e.g catering, educational software, photography, communication services

From time to time, we may also share pupil information with third parties, including:

- NHS health professionals, including the school nurse
- Educational psychologists
- Education Welfare Officers
- Prevent teams to meet the Prevent Duty on schools
- Police and law enforcement agencies
- Courts, if ordered to do so
- Research organisations
- Charities and voluntary organisations

We do not share information about our pupils with anyone without consent, unless the law and our policies allow us to do so.

When we share pupil information with third parties, we will always ensure that we share the minimum amount of information necessary for the purpose of the sharing. We will also require them to keep pupil personal information secure and to treat it in accordance with data protection law.

7. The lawful basis on which we use this information

Our school, as a data controller, needs to comply with the UK's General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018. We are required to ensure we have a lawful basis under the GDPR for any processing we carry out on personal data.

Under Article 6 of the GDPR, the lawful bases we rely on for processing pupil information are:

- We need to comply with a **legal obligation**, e.g. DfE data returns
- We need to meet our **public task** of running our school and keeping everyone safe
- We have a **legitimate interest**
- We have obtained **consent** to use personal information in a certain way
- We need to protect someone's life (**vital interests**) in an emergency.

Some pupil information requires extra protection because it is considered more sensitive. This includes race, ethnicity, religious beliefs, medical conditions, genetic information and biometric data.

Under Article 9 of the GDPR, if we are processing special category data, we will also rely on one of the following lawful conditions:

- We have **explicit consent**
- To meet our obligations as a data controller, or those of data subjects, in connection with **employment, social security and social protection**
- To meet our **public interest** task of keeping pupils safe and ensuring **equality of opportunity/treatment**
- To establish, exercise or defend **legal claims**
- To protect someone's life (**vital interests**) in an emergency.

In addition, under the UK's Data Protection Act 2018, we rely on the processing conditions at Schedule 1 part 1, paragraphs 8 and 18. These relate

to the processing of special category data for safeguarding and equality of opportunity/treatment. Our Appropriate Policy Document provides more information about this processing. A copy can be requested from our school lead (details on page 1).

8. Requesting access to your personal data

Under data protection legislation, 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 be given access to your child's educational record, contact the Data Protection Lead.

You also have the right to:

- to ask us for access to information about you that we hold
- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

If you have a concern or complaint 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/>

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.

9. Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the school lead, (details on page 1).

10. How you can help us

As a school, we have limited staff resources outside of term time. It is really helpful if parents can submit any requests for access to their child's information during term time and not too close to the end of term. This will support us in responding as quickly as possible to any requests, which we always want to do.

11. Any concerns

We take any concerns about our collection and use of personal information very seriously, so please contact us (details on first page) to raise any concerns in the first instance.

If you remain concerned, having done this, you have the right to raise your concerns with the Information Commissioner's Office:

<https://ico.org.uk/make-a-complaint/your-personal-information-concerns/>

12. Appendix One - Department for Education

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our pupils with the DfE, either directly or via our local authority for the purpose of those data collections.

For example, for the school census: section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

All data is transferred securely and held by DfE under a combination of software and hardware controls, which meet the current government security policy framework .

How Government uses your data

The pupil data that we lawfully share with the Department for Education (DfE) through data collections:

- underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.

- informs ‘short term’ education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).
- supports ‘longer term’ research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

Data collection requirements

To find out more about the data collection requirements placed on us by the Department for Education (DfE) (for example; via the school census) go to

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>

The National Pupil Database (NPD)

Much of the data about pupils in England goes on to be held in the National Pupil Database (NPD).

The NPD is owned and managed by the Department for Education (DfE) and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department for Education (DfE).

It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

To find out more about the NPD, go to

<https://www.gov.uk/government/publications/national-pupil-database-mpd-privacy-notice/national-pupil-database-mpd-privacy-notice>

Sharing by the Department for Education (DfE)

The law allows the Department for Education (DfE) to share pupils’ personal data with certain third parties, including:

- schools and local authorities
- researchers
- organisations connected with promoting the education or wellbeing of children in England
- other government departments and agencies
- organisations fighting or identifying crime

For more information about the Department for Education’s (DfE) NPD data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

Organisations fighting or identifying crime may use their legal powers to contact the Department for Education (DfE) to request access to individual level information relevant to detecting that crime.

For information about which organisations the Department for Education (DfE) has provided pupil information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the Police please visit the following website:

<https://www.gov.uk/government/publications/dfe-external-data-shares>

How to find out what personal information the Department for Education (DfE) holds about you

Under the terms of the [Data Protection Act 2018](#), you are entitled to ask the Department for Education (DfE):

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department for Education (DfE), you should make a 'subject access request'. Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>