



Stonesfield Primary School
Learning together to achieve our best

Privacy Notice (How we use pupil information)

This privacy notice is based on a model template published by the Department for Education in July 2021.

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:

Headteacher: Ben Trevail email: head.2353@stonesfield.oxon.sch.uk

Data protection officer (DPO): Nicola Cook email: nicola@schoolsdp.com

The categories of pupil information that we process include:

- **Personal identifiers and contacts** (e.g. name, unique pupil number, contact details and address, photographs)
- **Characteristics** (e.g. ethnicity, language, pupil premium and free school meal eligibility)
- **Attendance** (e.g. sessions attended, number of absences, absence reasons and any previous schools attended)
- **Assessment and attainment** (e.g. statutory assessment data and internal assessments)
- **Safeguarding information** (e.g. record of concerns, pupil chronologies, court orders and professional involvement)
- **Special educational needs** (including the needs and ranking)
- **Medical and administration** (e.g. doctor's information, child health, dental health, allergies, medication and dietary requirements)
- **Behavioural information** (e.g. incident reports, exclusions and any relevant alternative provision put in place)
- **Catering and school meal management** (e.g. lunch orders and invoicing)
- **Additional educational activity information** (e.g. permissions for trips/visits and use of photographs)

For detailed information on the information available under the Freedom of Information Act 2000 (FOIA) please see *Freedom of Information: Guide to information available from Stonesfield Primary School under the model publication scheme*.

Why we collect and use pupil information

We collect and use pupil 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 keep children safe (child protection, food allergies, or emergency contact details)
- e) to assess the quality of our services
- f) to meet the statutory duties placed upon us for DfE data collections

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 UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing pupil information are:

- for the purposes of **a), b), c) and d)** in accordance with the legal basis of **Public task**: collecting the data is necessary to perform tasks that schools are required to perform as part of their statutory function
 - for the purposes of **e)** in accordance with the legal basis of **Legitimate interests**: assessing quality of our services
 - for the purposes of **(f)** in accordance with the legal basis of **Legal obligation**: data collected for DfE census information
- o [Section 537A of the Education Act 1996](#)
 - o [Education Act 1996 s29\(3\)](#)
 - o [the Education \(School Performance Information\)\(England\) Regulations 2007](#)
 - o [regulations 5 and 8 School Information \(England\) Regulations 2008](#)
 - o [the Education \(Pupil Registration\) \(England\) \(Amendment\) Regulations 2013](#)

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.

Whenever we rely on consent as our lawful basis, it must be freely given, informed and clear. It can also be withdrawn at any time by contacting the school lead (details on the first page).

Collecting pupil information

We collect pupil information via

- registration forms at start of each academic year (data provided by parent / carer)
- Common Transfer File (CTF) when transferring from another school or from external professionals

Pupil data is essential for the school's 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.

Storing pupil data

A significant amount of personal information is stored electronically, e.g. in our management information system (Integris) or secure google drive. Some information may also be stored in hard copy format in lockable rooms or cabinets. We hold pupil data securely for the set amount of time shown in our data retention schedule.

Who we share pupil information with

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- safeguarding services
- external providers (eg catering, IT support, online learning providers)

When we share pupil information with external providers, 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.

From time to time, in the interests of the child, 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.

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 Department for Education (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](#).

For more information, please see 'How Government uses your data' section.

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, please see the Data Protection Policy available on the [school website here](#).

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 DfE, please see the 'How Government uses your data' section of this notice.

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 using the contact details on page 1.

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/>

Call: 0303 123 1113

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 in November 2021 and is based on Department for Education model template published in July 2021.

How Government uses your data

The pupil data that we lawfully share with the 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 (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 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.

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-user-guide-and-supporting-information>.

Sharing by the Department

The law allows the Department 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's 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 DfE to request access to individual level information relevant to detecting that crime.

For information about which organisations the Department 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/dfе-external-data-shares>.

How to find out what personal information DfE hold about you

Under the terms of the Data Protection Act 2018, you are entitled to ask the Department:

- 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, you should make a 'subject access request'. Further information on how to do this can be found within the Department's 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 DfE: <https://www.gov.uk/contact-dfe>.