



# Privacy Notice for pupils

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## **I. Overview**

- 1.1. This privacy notice explains how we collect, store and use personal data about pupils at our schools. As an education provider, we collect and process your personal data in accordance with the General Data Protection Regulation (GDPR) and other relevant legislation, and will not disclose your personal data to any other third party, unless allowed or required to by law.
- 1.2. Supplementary information relating to the processing that goes on at each individual school is available separately from and can be found within the 'Privacy notice' section of each school website or can be obtained from the school reception directly.
- 1.3. This notice is based on the Department for Education's model privacy notice for the pupils, amended to reflect the way we use data in our organization. We are committed to protecting the privacy of the individuals whose data we process and to undertaking all data processing in a lawful, open and transparent way.

## **2. The categories of pupil information that we collect**

- 2.1. The categories of pupil information that we collect, process, hold and share include, but is not limited to, the following:
  - 2.1.1. personal identifiers and contacts (such as name, unique pupil number, contact details and address)
  - 2.1.2. characteristics (such as ethnicity, language, and free school meal eligibility)
  - 2.1.3. safeguarding information (such as court orders and professional involvement)
  - 2.1.4. special educational needs (including the needs and ranking)
  - 2.1.5. medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
  - 2.1.6. attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
  - 2.1.7. assessment and attainment (such as key stage 1 and phonics results, post 16 courses enrolled for and any relevant results)
  - 2.1.8. behavioral information (such as exclusions and any relevant alternative provision put in place)
  - 2.1.9. Trips and visits
  - 2.1.10. Catering and free school meals information
  - 2.1.11. Identity management/authentication
- 2.2. This list is not exhaustive, to access the current list of categories of information we process please contact the school reception directly.

### **3. Why we collect and use pupil information**

- 3.1. We collect and hold personal information relating to our pupils and may also receive information about them from their previous school, local authority and/or the Department for Education (“DfE”).
- 3.2. We collect and use this pupil information to:
  - 3.2.1. support our pupils’ learning and provide pupils’ with an education
  - 3.2.2. to monitor and report on pupil attainment progress
  - 3.2.3. allocate the correct teaching resource
  - 3.2.4. provide any additional support
  - 3.2.5. to meet the statutory duties placed upon us for DfE data collections and comply with Local Authority data requests
  - 3.2.6. to ensure the safety of pupils whilst in our care
  - 3.2.7. monitor and report on their progress
  - 3.2.8. provide appropriate pastoral care; and
  - 3.2.9. assess the quality of our services

### **4. Legal Basis for collecting and processing pupil information**

- 4.1. Under the General Data Protection Regulation (GDPR), the legal basis we rely on for processing personal information for general purposes are:
  - 4.1.1. Article 6 - 1 (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
  - 4.1.2. Article 6 – 1 (b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
  - 4.1.3. Article 6 – 1 (c) processing is necessary for compliance with a legal obligation to which the controller is subject;
  - 4.1.4. Article 6 – 1 (d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;
  - 4.1.5. Article 6 - 1(e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- 4.2. In addition, concerning any special category data:
  - 4.2.1. Article 9 – 2 (a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes

### **5. Collecting pupil information**

- 5.1. We collect personal information via registration forms at the start of the school year, secure file transfer from previous school, change of personal details forms and by data collection forms as and when required.

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

## **6. How long pupil information will be kept**

- 6.1. We keep personal information about pupils while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. We hold data securely for the set amount of time shown in our data retention schedule.

## **7. Who we share pupil information with**

### **7.1. Youth support services**

#### **7.1.1. Pupils aged 13+**

- 7.1.1.1. Once our pupils reach the age of 13, we are legally required to pass pupil information to our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

- 7.1.1.2. This enables them to provide services as follows:

7.1.1.2.1. youth support services

7.1.1.2.2. careers advisers

- 7.1.1.3. The information shared is limited to the child's name, address and date of birth. However, where a parent or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the child / pupil once they reach the age 16.

#### **7.1.2. Pupils aged 16+**

- 7.1.2.1. We are legally required to share certain information about pupils aged 16+ with our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

- 7.1.2.2. This enables them to provide services as follows:

7.1.2.2.1. post-16 education and training providers

7.1.2.2.2. youth support services

7.1.2.2.3. careers advisers

- 7.1.3. For more information about services for young people, please visit our local authority website.

### **7.2. Department for Education**

- 7.2.1. 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.

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

7.2.3. For more information, please see 'How the Government uses your data' section [Appendix I].

### **7.3. Other**

7.3.1. In addition, we routinely share pupil information with:

- 7.3.1.1. Office for Standards in Education (Ofsted)
  - 7.3.1.2. law enforcement agencies and bodies (including Courts and Tribunals)
  - 7.3.1.3. educators and examining bodies
  - 7.3.1.4. Schools within the Trust
  - 7.3.1.5. local authorities
  - 7.3.1.6. schools that the pupils attend after leaving us
  - 7.3.1.7. parent, guardian or representatives
  - 7.3.1.8. auditors
  - 7.3.1.9. health authorities (NHS)
  - 7.3.1.10. healthcare, social and welfare organisations
  - 7.3.1.11. security organisations
  - 7.3.1.12. professional advisers and consultants
  - 7.3.1.13. charities and professional bodies
  - 7.3.1.14. suppliers and service providers
- 7.3.2. We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

## **8. Transferring data internationally**

- 8.1. 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.

## **9. Requesting access to your personal data**

- 9.1. Under data protection legislation, parents, guardians and pupils have the right to request access to information about them that we hold. You also have the right to:
  - 9.1.1. object to processing of personal data that is likely to cause, or is causing, damage or distress
  - 9.1.2. prevent processing for the purpose of direct marketing
  - 9.1.3. object to decisions being taken by automated means
  - 9.1.4. in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
  - 9.1.5. a right to seek redress, either through the ICO, or through the courts
- 9.2. To make a request for your personal information or to exercise your rights under GDPR, we invite you to contact our Data Protection Officer.

## **10. Complaints/ Concerns**

- 10.1. If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office.

## **11. Contact**

- 11.1. If you would like to discuss anything in this privacy notice, please contact the Data Protection Officer.

## Appendix I – How the Government uses your data

1. Why the Government collects your data
  - 1.1. The pupil data that we lawfully share with the DfE through data collections:
  - 1.2. underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.
  - 1.3. informs 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).
  - 1.4. supports 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)
2. Data collection requirements
  - 2.1. To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.
3. The National Pupil Database (NPD)
  - 3.1. Much of the data about pupils in England goes on to be held in the National Pupil Database (NPD).
  - 3.2. 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.
  - 3.3. 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.
  - 3.4. To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>
4. Sharing by the Department
  - 4.1. The law allows the Department to share pupils' personal data with certain third parties, including:
    - 4.1.1. schools
    - 4.1.2. local authorities
    - 4.1.3. researchers
    - 4.1.4. organisations connected with promoting the education or wellbeing of children in England
    - 4.1.5. other government departments and agencies
    - 4.1.6. organisations fighting or identifying crime
  - 4.2. 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>

- 4.3. 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. Whilst numbers fluctuate slightly over time, DfE typically supplies data on around 600 pupils per year to the Home Office and roughly 1 per year to the Police.
- 4.4. 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/dfe-external-data-shares>
- 4.5. To contact DfE: <https://www.gov.uk/contact-dfe>