



# **Privacy Notice – Pupils**

## **How we use pupil information**

<b>Last updated:</b>	<b>Feb 2023</b>
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### **The categories of pupil information that we process include:**

- personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- characteristics (such as ethnicity, language, and free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- special educational needs (including the needs and ranking)
- medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (such as key stage 1 and phonics results, post 16 courses enrolled for and any relevant results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- trips and activities,
- catering and free school meal management
- wraparound provision
- extra-curricular clubs

### **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 progress
- c) to provide appropriate pastoral care
- d) to assess the quality of our services
- e) to keep children safe (food allergies, or emergency contact details)
- f) to meet the statutory duties placed upon us for the Department for Education (DfE) data collections

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

- We need to comply with a legal obligation
- We have obtained your consent to use it in a certain way

Less commonly, we may also process pupils' personal data in situations where:

- We need it to perform an official task in the public interest
- Where we have obtained consent to use pupils' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.
- Some of the reasons listed above for collecting and using pupils' personal data overlap, and there may be several grounds which justify our use of this data.
- This legal basis for collecting and using personal data is set out in Article 6 and Article 9 of the GDPR.

### **Collecting pupil information**

We collect pupil information via the admissions form we ask you to complete before your child starts with us at school or on a Common Transfer File (CTF) from your child's previous school. 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 and we will tell you what you need to do if you do not want to share this information with us.

### **Storing pupil data**

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. The schedule set out in the Information and Records Management Society's toolkit for schools sets out how long we keep information about pupils, what we retain and what we dispose of and when. We also have our Data

Retention Schedule which sets out more information about how long we keep personal information, how we store your information whilst we are processing it and how we dispose of the information when we no longer need it. This Schedule follows guidance set out in the DfE's toolkit for schools.

### **Who we share pupil information with and why**

We do not share information about pupils with any third party without consent unless the law and our policies allow us to do so. Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about pupils with:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
- The Department for Education – to meet our legal obligation to provide census information (see further information below) and information on attainment and progress.
- The pupil's family and representatives – in order to provide the child's parents/carers with information about performance, attainment, attendance and behaviour.
- Educators and examining bodies – externally marked test papers contain pupil names and dates of birth.
- Our regulator e.g. Ofsted – requires data to analyse performance of the school. On visiting the school the inspector will ask to see staff applications/references, pupil information, reports and referrals.
- Suppliers and service providers – to enable them to provide the service we have contracted them for such as online digital learning environments and our online tracking system.
- Financial organisations – such as moneyless payment systems, giving parents the facility to pay for dinner money and school trips digitally
- Central and local government – termly census data.
- Our auditors – financial auditors who inspect our school every 3 years.
- Health authorities – school nursing team, national NHS data collection of heights and weights initiative for Reception and Year 6 children.
- Children's Social Care
- Health and social welfare organisations – if there is a medical need or arrangement for a particular child or if it is in the interests of safeguarding of the child.
- Professional advisers and consultants – e.g. – Writing moderators for Standards and Testing Agency – who select pupils work to moderate
- Police forces, courts, tribunals – these services require access to data should an incident occur to one of our pupils, staff or families.

### **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 **businessmanager@highhashschool.co.uk**

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.

#### **Contact**

If you would like to discuss anything in this privacy notice, please contact  
[businessmanager@highhashschool.co.uk](mailto:businessmanager@highhashschool.co.uk)

#### **Last updated**

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. The policy will be reviewed by Governors every 12 months.

## How Government uses your data

The pupil data that we lawfully share with the 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-user-guide-and-supporting-information>

### 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>