



# NORMAN STREET PRIMARY SCHOOL

## PRIVACY NOTICE FOR PUPILS

(How we use pupil information)

**The categories of pupil information that we collect, hold and share include:**

- Personal information (such as name, unique pupil number, date of birth, gender, family structure and details including telephone, mobile and email, home address, transport arrangements, previous school history, early help, accident/incident reports, in care status).
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility).
- Entitlement to school transport, pupil premium and service child indicators.
- Catering and free school meal management.
- Attendance information (such as sessions attended, number of absences and absence reasons and any previous schools attended).
- Assessment, pupil progress and attainment information.
- Medical information (such as doctors' information, child health, dental health, vaccinations, medical conditions, medication, health care plans, allergies, dietary requirements).
- Special educational needs (including the needs and ranking).
- Safeguarding information (such as court orders and professional involvement).
- Behavioural information (exclusions, detentions, sanctions and any relevant alternative provision put in place).
- Photos, videos and sound recordings of children.
- Financial information (such as in relation to fees, charges and contributions).
- Trips and activities.

**Why we collect and use this information:**

We collect and use the pupil data:

- To support pupil learning.
- To monitor and report on pupil attainment progress.
- To provide appropriate pastoral care.
- To assess the quality of our services.
- To keep children safe (food allergies or emergency contact details).
- To meet statutory duties placed upon us for DfE data collections.
- To comply with the law regarding data sharing.
- For scientific or historical purposes.
- For archiving purposes in the public interest.

**Under the General Data Protection Regulation (GDPR) the lawful basis we rely on for processing pupil information.**

**To process a piece of personal data we must satisfy at least one condition for the lawful processing of personal data from Article 6 of the GDPR.**

To process the personal data of our pupils we generally rely on 6(1)(e) i.e. to educate them. Some pieces of data are processed for other reasons. For example, we publish their exams/SATs results relying on 6(1)(c) because the law requires us to; we hold their next of kin data relying on 6(1)(d); and we use their image sometimes relying on 6(1)(a).

We rely on different conditions to process different pieces of the personal data of families, e.g. 6(1)(b) for their financial details to provide meals, photographs etc.; and 6(1)(d) for their contact details in case their child is ill.

**To process a piece of sensitive personal data we must satisfy at least one condition for the lawful processing of special categories of data from Article 9 of the GDPR.**

We rely on different conditions for the lawful processing of sensitive personal data for different things.

To process the sensitive personal data of our pupils we rely on 9(2)(b) in respect of child protection and multi-agency safeguarding work; 9(2)(b) or 9(2)(h) to use their health information to protect them at school; 9(2)(i) to report on their health to PHE or the HSE as required; and 9(2)(f) to retain accident and ill-health information in the case of a claim for compensation.

We apply the same criteria to processing the sensitive personal data of families.

**Collecting Pupil Information**

We collect pupil information via new starter and appropriate data collection forms, permission slips, school MIS and IT, Common Transfer File (CTF) and secure file transfer from previous school.

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 is 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**

We hold pupil data securely for the set amount of time shown in our data retention schedule. This is in line with the Information and Records Management Society (IRMS) Records Management Toolkit for Schools (Rev 2016).

**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)
- School Staff and Governing Body
- External providers for Pupil Management Information Systems and school or parent communication and school photographer
- Healthcare professionals
- Social and Welfare organisations
- Police forces
- Voluntary and charitable organisations
- School website

- Social media

### **Why we regularly share pupil information**

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

### **Department for Education**

We share pupils' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

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 under 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.

### **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 perform 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
- 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 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. 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.

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/national-pupil-database-requests-received>

### **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 Mrs K Richards, Acting Deputy Headteacher (Data Controller), Norman Street Primary School, Norman Street, Carlisle, CA1 2BQ, [office@normanst.cumbria.sch.uk](mailto:office@normanst.cumbria.sch.uk) 01228 210168.

You also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Prevent processing for the purpose of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- A right to seek redress, either through the ICO or through the courts.

If you have a concern or complaint about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

### **Contact**

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

Mrs K Richards, Acting Deputy Headteacher (Data Controller), Norman Street Primary School, Norman Street, Carlisle CA1 2BQ, [office@normanst.cumbria.sch.uk](mailto:office@normanst.cumbria.sch.uk) , 01228 210168