



Hackleton CEVA Primary School
Inspiring learning for life

Hackleton CEVA Primary School

GDPR Privacy Notice – Pupils

Privacy notice for pupils

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about pupils.

We, Hackleton CEVA Primary School, are the 'data controller' for the purposes of data protection law.

Our data protection officer is Ruth Hawker – Plumsun Ltd.

The categories of pupil information that we process include:

Personal data that we may collect, use, store and share (when appropriate) about students/pupils includes, but is not restricted to:

- Personal identifiers and contacts (such as name, unique pupil number, contact details, address, date of birth, identification documents)
- 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 school attended)
- Assessment and attainment results, post 16 courses enrolled for and any relevant results
- Pupil and curricular records
- Exclusion information
- Behaviour information (such as exclusions and any relevant alternative provision put in place)
- Attendance information (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- Details of any support received, including care packages, plans and support providers
- Photographs
- CCTV images captured in school

This list is not exhaustive – to access the current list of categories of information the school processes, please see the school's Data Asset Register, a copy of which can be obtained by contacting the school office.

We may also hold data about students/pupils that we have received from other organisations, including other schools, local authorities and the Department for Education.

Why we collect and use pupil information

We collect and use pupil information, for the following purposes:

- 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)
- Administer admissions waiting lists
- Carry out research
- Comply with the law regarding data sharing
- To meet the statutory duties placed upon us by the Department of Education (DfE)

Our legal basis for using this data

We only collect and use pupils' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest

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

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

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.

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

Article 6

1. Processing shall be lawful only if and to the extent that at least one of the following applies:
 - (c) Processing is necessary for compliance with a **legal obligation** to which the controller is subject;
 - (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;

Article 9(2)

(b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;

1. Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data

for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited.

2. Paragraph 1 shall not apply if one of the following applies:

- (j) Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Further information regarding data collection can be found in the Education Act 1996 within guide documents on the following website: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

Collecting pupil information

We collect pupil information via registration forms at the start of the school year or Common Transfer File (CTF) or secure file transfer from a 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 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 Records Management Policy. 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.

For more information about how we securely store your information, please see the school's Security Breach Management Plan, a copy of which can be obtained from the school office.

Who we share pupil information with

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

We share pupil's 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 our Local Authority (LA) and the Department for Education (DfE) under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

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 (DfE) – to meet our legal obligations to share certain information with it.
- Schools that pupils attend after leaving the school
- The pupil's family and representatives – to provide regular reports on the pupil's progress and to ensure the pupil's safety whilst at school
- Educators and examining bodies – to meet our legal obligations and allow the pupil to be entered for assessments
- Ofsted – to meet our legal obligations
- Suppliers and service providers – to enable them to provide the service we have contracted them for

- Survey and research organisations – to help us fulfil our public task
- Health authorities – to meet our legal obligation to keep our pupils safe
- Health and social welfare organisations – to meet our legal obligation and to protect the pupils
- Professional advisers and consultants – to help us fulfil our public task
- Charities and voluntary organisations - to help us fulfil our public task and to protect the pupils
- Police forces, courts, tribunals – to meet our legal obligations to share information with them

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 personal information, or be given access to your child's educational record, contact Mrs Sally Gillam on 01604 870086 or email head@hackleton.northants-ecl.gov.uk

You also have the right to:

- Ask us for access to information about you that we hold
- Have your personal data rectified, if it is inaccurate or incomplete
- Request the deletion or removal of personal data where there is no compelling reason for its continued processing
- Restricting our processing of your personal data i.e. permitting its storage but no further processing
- 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/>

How to withdraw consent and lodge complaints

Where our school processes your personal data with your consent, you have the right to withdraw your consent at any time.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact the headteacher, Mrs Sally Gillam on 01604 870086 or email head@hackleton.northants-ecl.gov.uk

You can also contact our Data Protection Officer:

Ruth Hawker – Plumsun Ltd

Email: info@plumsun.com

Tel: 0845 862 2684

Address: Almshouses, Great Brington, Northampton, NN7 4HY.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

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 October 2023.

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact:

Mrs Sally Gillam on 01604 870086 or email head@hackleton.northants-ecl.gov.uk

This notice is based on the [Department for Education's model privacy notice](#) for pupils, and to reflect the way we use data in this school.

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 (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 of Education (DfE)

The law allows the Department of 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 of 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 of 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 of Education (DfE), 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>