



## **Bewdley Primary School Privacy Notice (September 2022)** **(How we use pupil information)**

We, Bewdley Primary School, are a data controller for the purposes of the General Data Protection Regulation. We collect information from you and may receive information about you from your previous school, Worcestershire County Council, DfE (Department for Education, Police, NHS and other external government agencies).

### **The categories of pupil information that we process include:**

- personal information and contacts (such as name, unique pupil number, contact details and address)
- characteristics (such as ethnicity, language, country of birth and free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- special educational needs information
- 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 and KS2 SATS)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- Photographs
- Consent forms for trips
- Lunch registers for school meal management

### **Why we collect and use pupil information?**

We collect and use pupil information under the General Data Protection Regulation (GDPR) for the following purposes:

- a) To maintain our own accounts and records
- b) to support pupil teaching and learning
- c) to monitor and report on pupil attainment progress
- d) to provide appropriate pastoral care / safeguarding
- e) to assess the quality of our services
- f) to keep children safe (food allergies, or emergency contact details)
- g) to meet the statutory duties placed upon us for DfE data collections
- h) to assess the performance of the school

### **How we collect 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 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.

### **How we store pupil data**

We hold pupil data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please visit [www.bewdleyprimary.co.uk](http://www.bewdleyprimary.co.uk).

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

We sometimes need to share the personal information we process with the individual themselves and also with other organisations. Where this is necessary we are required to comply with all aspects of the General Data Protection Regulation (GDPR). What follows is a description of the types of organisations we may need to share some of the personal information we process with for one or more reasons.

- schools that the pupils attend after leaving us
- our local authority Worcestershire County Council
- the Department for Education (DfE)
- Educational providers that students have attended or are transferring to
- Education, training, careers and examining bodies
- School staff (if legal and necessary)
- Family, associates and representatives of the person whose personal data we are processing
- NHS and healthcare professionals
- Social and welfare organisations (e.g.) School Nurse
- Law enforcement organisation and courts
- Suppliers and educational service providers (e.g., SIMS, Fisher Family Trust and Parent Pay)
- Press and the media
- School trips organisations (e.g. Manor Adventure and Arete)

### **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

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, 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.

## Requesting access to your personal data

Under General Data Protection Regulation, 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 Nikki Walker, School Business Manager.

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

## The school has appointed a Data Protection Officer in order to:

- Inform and advise the Leadership Team about their obligations to comply with the GDPR and other data protection laws.
- Monitor the School's compliance with the GDPR and other laws, including managing internal data protection activities, advising on data protection impact assessments, conducting internal audits, and providing the required training to staff members.

A Service level agreement is in place for the role of DPO. The individual appointed as DPO will have professional experience and knowledge of data protection law, particularly that in relation to Schools. The DPO will report to the highest level of Leadership, which is the Senior Leadership Team. The DPO will operate independently and will not be dismissed or penalised for performing their task. Sufficient resources will be provided to the DPO to enable them to meet their GDPR obligations

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/>

## Contact

If you would like to discuss anything in this privacy notice, please contact Nikki Walker.

## 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
- 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. 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/dfe-external-data-shares>

To contact DfE: <https://www.gov.uk/contact-dfe>