Privacy notice: how we use pupil information

Adopted: Autumn 2018   **Next review:** annually, unless any changes are required prior to this
Updated: Autumn 2019

The categories of pupil information that we process

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

- personal identifiers and contacts (such as name, date of birth, 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, details of any support received including care packages, plans and other support providers)
- exclusion 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, post 16 courses enrolled for and any relevant results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- financial information (relating to eligibility for free school meals, pupil premium, Early Years pupil premium, school trip/residential visit payments, other activity payments and funding for Nursery places)
- photographs

We may also hold data about 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)
- to meet the requirements of the Keeping Children Safe in Education regulations and safeguarding our pupils (protect pupil welfare)
- to enable school to provide access to school systems – e.g. School Gateway
- to meet the statutory duties placed upon us for DfE data collections (compliance with a legal obligation)
- to perform a task carried out in the public interest (educational services)
- to carry out research (this is for educational, or occasionally health, purposes)
- to comply with the law regarding data sharing

We only collect and use pupils' personal data when the law allows us to. Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing pupil information are Article 6:

- (c) process is necessary for compliance with a legal obligation;
- (e) processing is necessary in the exercise of official authority;

And where appropriate Article 9 where special categories of data are processed.

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.

How we collect pupil information

We collect pupil information via school admission forms, health forms, common transfer files from Leeds City Council Admissions Team (CTF), secure file transfer from previous schools or other agencies, pupil premium eligibility forms, 30 hr funding forms and letters relating to specific events e.g. residential visits.

Pupil data is essential for the schools' operational use. While the majority of information we collect about pupils is mandatory, there is some information that can be provided voluntarily.

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 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. Our record retention policy sets out how long we keep information about pupils. For more information on our record retention schedule and how we keep your data safe, please visit the school website.

Who we share pupil information with and why we share information

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:

- schools that the pupils attend after leaving us
- our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
- the pupil's family and representatives
- educators and examining bodies
- the Department for Education (DfE)
- Ofsted
- School Nursing Team, NHS services, other health professionals
- Leeds City Council Children's Services
- our school communication service
- other suppliers and service providers – to enable them to provide the service we have contracted them for

Department for Education and National Pupil Database

We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school census 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. Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the Department and provides evidence on school performance to inform research.

The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The Department for Education may share information from the NPD with other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

Examples of these organisations include:

- 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 (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 more information, see the Department's webpage on [how it collects and shares research data](#). You can also [contact the Department for Education](#) with any further questions about the NPD.

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

Transferring data internationally

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.

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 our **data protection officer**:

- Alison Jones, at dpo@spherefederation.org

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

Complaints

We take any complaints about our collection and use of personal information very seriously. 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 our data protection officer. 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
- write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact us

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

- Moortown Primary School - Alison Jones, at dpo@spherefederation.org
- Scholes (Elmet) Primary School – Richard Lewis-Ogden, at dpo@spherefederation.org
- St James' CE Primary School - Alison Jones, at dpo@spherefederation.org

Alternatively, call the school directly on:

- Moortown Primary School – 0113 268 5915
- Scholes (Elmet) Primary School – 0113 264 9149
- St James' CE Primary School – 01937 583 379

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