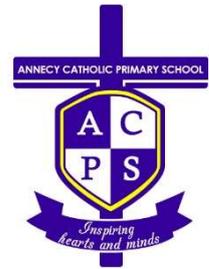


ANNECY CATHOLIC PRIMARY SCHOOL

"Inspiring hearts and minds to grow"



Privacy Notice (How we use pupil information)

Anecy Catholic Primary School complies with the GDPR and is part of Bosco CET. Bosco CET is registered as a 'Data Controller' with the Information Commissioner's Office (REG. No. ZA245247). We ensure that your personal data is processed fairly and lawfully, is accurate, is kept secure and is retained for no longer than is necessary.

The Legal Basis for Processing Personal Data

The main reason that the school processes personal data is because it is necessary in order to comply with the school's legal obligations and to enable it to perform tasks carried out in the public interest.

The categories of pupil information that we collect, hold and share include, but is not restricted to:

- personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- contact details, contact preferences and date of birth
- pupil and curricular records
- 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)
- free school meal management/authentication
- trips and activities records including clubs
- photographs and videos

How we use information

We collect and hold personal information relating to our pupils and those involved in their care, we may also receive information from previous schools, the local authority(s) and/or the Department for Education (DfE).

Why we collect and use pupil information

The personal data collected is essential, for the school to fulfil their official functions and meet legal requirements.

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 by the Department for Education
- g) to enable electronic communications/lunch ordering/payment through our third party providers
- h) to promote the school
- i) to enable online learning in the event of school closures during the pandemic

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

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** (Article 6c)
- We need it to perform an official task in the **public interest** (Article 6e)

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

- We have obtained **consent** to use it in a certain way (Article 6a)
- We need to protect the individual's **vital assets** (or someone else's interests) (Article 6d)
- We have a genuine and legitimate reason and we are not harming any of your rights and interests

As a school, we also collect and use special category data, both to provide education and comply with our legal obligations. We have therefore identified additional lawful bases from Article 9 of the GDPR. Most commonly, we process special category data where:

- We have gained explicit **consent** for the processing
- Processing is necessary for reasons of **substantial public interest**. For example, when processing data in order to comply with the Special Educational Needs and Disability code of practice, the Supporting pupils at school with medical conditions or Keeping Children Safe in Education.
- We are required to for reasons of "public health", for example during a pandemic

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. If you wish to withdraw your consent at any time, please write to Mr Gallagher, headteacher.

If we decide we need your explicit consent to process special category data, we will contact you separately about this.

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.

We do not process the data in any way that involves any automated decision making, including profiling.

Collecting Pupil Information

We collect pupil information via the admissions form that you fill in when your child joins the school. If your child joins from another school, we will receive a CSV file transferred from their school management system to ours. We also ask parents to check and update their data annually.

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 General Data Protection Regulation, we will inform you 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

In most cases, we hold pupil data for the duration of the time the child is a pupil at this school (or until the child leaves statutory education if they do not transfer to another UK educational establishment). We may occasionally keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. 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:

<https://irms.site-ym.com/page/SchoolsToolkit>

Who we share pupil information with

We routinely share pupil information with:

- schools that a pupil attends after leaving this school – to enable them to continue their education
- our Local Authority (East Sussex) – to enable them to monitor the quality of education at our school
- Ofsted – to enable them to monitor the quality of education at our school
- the Department for Education (DfE) – to enable them to monitor the quality of education at our school
- NHS, school nurses and the police – to enable them to help us safeguard the children
- NHS Test and Trace – to fulfil our duties during the pandemic
- the school's chosen third party providers of electronic communications and online learning – to enable online learning to continue in the event of school closures during the pandemic
- the school's chosen third party providers of electronic payments – to efficiently run the school
- the school's chosen third party electronic attendance and visitor systems – to efficiently run the school
- some providers of teaching, learning and assessment software – to support high quality teaching and learning
- the school's chosen third party provider of reporting software – to efficiently run the school and ensure important information about children is shared by all teachers
- Bosco Catholic Education Trust
- The Diocese of Arundel & Brighton
- Third part organisations, as allowed by law
- Agencies that provide services on our behalf (e.g. Eschools; Parentpay)
- Compass – school dinners provider (food allergies, free school meals)
- Social welfare organisations

- Police forces, courts, tribunals

For further information about who we share with and why please see APPENDIX A.

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.

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.

Thrive

As part of our adoption of the Thrive Approach, we carry out assessments of whole classes and individual children in relation to their social and emotional development. This assessment is automatically analysed, providing indicators of any particular areas for development and support. The results are used to guide the teacher or other adult as to the activities and teaching that would be useful for that class or child.

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:

regulation 5 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.

Local Authorities

We may be required to share information about our pupils with the local authority to ensure that they can conduct their statutory duties under

- the [Schools Admission Code](#), including conducting Fair Access Panels.

Requesting access to your personal data

Under GDPR, 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, please put your request in writing to Mr Gallagher, headteacher.

Depending on the lawful basis above, you may 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 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 DfE, please see the 'How Government uses your data' section of this notice.

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 on March 2021.

Contact

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

School Secretary: Chris Baillie, email: office@annecy.org.uk

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>

Data Protection Officer

The school's Data Protection Officer can be contacted by emailing: office@annecy.org.uk

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>

How to find out what personal information DfE hold about you

Under the terms of the Data Protection Act 2018, you are entitled to ask the Department:

- 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, 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>

APPENDIX A

Who we share data with and why

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 (DfE)

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 (DfE) under regulation 5 of The education (Information About Individual Pupils) (England) Regulations 2013.

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)

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.

We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (information About Individual Pupils) (England) Regulations 2013.

To find out more about the NPD, go to:

<https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

The department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- conduction research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data.

Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

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>

For information about which organisations the department has provided pupil information, (and for which project), please visit the following website:

<https://www.gov.uk/government/publication/national-pupil-database-requests-received>

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

Primary Care Trusts (PCTs)

We are required, by law, to pass certain information about our pupils to PCT's.

PCT's use information about pupils for research and statistical purposes, to develop, monitor and evaluate the performance of local health services. These statistics will not identify individual pupils. It is necessary for certain health information about children (for example, such as their height and weight) to be retained for a certain period of time (designated by the Department of Health) and requires these PCTs to maintain children's names and addresses for this purpose. PCTs may also provide individual schools and Local Authorities (Las) with aggregated health information which will not identify individual children.

Local Authority – education and training

We are required, by law, to pass certain information about our pupils to local authorities.

The LA holds information about young people living in its area, including about their education and training history. This is to support the provision of their education up to the age for 20 (and beyond this age for those with a special education need or disability). Education institutions and other public bodies (including the Department for Education (DfE), police, probation and health services) may pass information to the LA to help them to do this.

The LA shares some of the information it collects with the Department for Education (DfE) to enable them to; produce statistics, assess performance, determine the destinations of young people after they have left school or college and to evaluate Government funded programmes.

The LA may also share information with post-16 education and training providers to secure appropriate support for them. They may also share data with education establishments which shows what their pupils go on to do after the age of 16.

If you want to see a copy of information about you that the LA holds, please contact the Data Protection Officer: FOI@eastsussex.gov.uk

Local Authority – social services

In order to comply with our statutory safeguarding duties, we are required, by law, to pass certain information about our pupils to local authorities. Information will only be shared where it is fair and lawful to do so.

If you want to see a copy of information about you that the LA hold, please contact the Data Protection Officer: FOI@eastsussex.gov.uk

Police, Fire and Rescue Service, Ambulance Service and other emergency or enforcement agencies

In order to comply with our duty of care to pupils, our statutory safeguarding duties and our obligations in respect of the prevention and detection of crime, we may also share personal data with other statutory and partnership agencies.