



2.0 Privacy Notice - Pupil

Spire Junior School

[Version 1]

Last Reviewed	June 2020
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Job Role	School Business Manager / Headteacher
Next Review Date	September 2021



Contents

2.1 What this Privacy Notice is for	2
2.2 The types of information that we process	2
2.3 Special category data.....	2
2.4 Why we collect and use pupil information.....	3
2.5 How we collect pupil information	3
2.6 How and where we store pupil information.....	4
2.7 Who we share pupil information with	4
2.8 Why we regularly share pupil information	4
2.9 Requesting access to your personal data, and other rights.....	5
2.10 How Government uses your data	5
2.11 Data collection requirements	6
2.12 The National Pupil Database (NPD).....	6
2.13 Sharing by the Department	6
2.14 Learner Records Service.....	7
2.15 Contacts	7

Privacy Notice (How we use pupil information) – For pupils and their families

2.1 What this Privacy Notice is for

Spire Junior School collects, holds, uses and shares information about our pupils and their families. This is known as “personal data” and you have rights around that data, including knowing how and why we are processing the data. “Processing” data means from collecting, storing, using, sharing and disposing of it.

2.2 The types of information that we process

- personal information that identifies you, and your contact details. This includes name, date of birth, unique pupil number, photographs, contact details and address
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- assessment and attainment (such as National curriculum assessment results e.g. Key Stage 2 results, exam results and student performance at different data collections, [post 16 courses enrolled for] and any relevant results)
- Extra-curricular and enrichment participation
- CCTV data

2.3 Special category data

- 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 information (such as Doctor’s information, child health, dental health, allergies, medication and dietary requirements)
- Funding (Free school meal, Pupil Premium, ESA, High Needs Funding and Catch Up Funding)

2.4 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
- to meet the statutory duties placed upon us for DfE
- to comply with the law regarding data sharing
- for site security
- protect public monies against fraud
- to streamline systems

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

- Article 6(a) - Consent (for any processing which does not fall into the bases detail within this section below)
- Article 6(c) - Compliance and Legal Obligation
as set out in the Education Act 1996 (as amended). We are required to share information about our pupils with the (DfE) under regulation 3 of The Education (Information About Individual Pupils) (England) Regulations 2013. **In addition, there are extensive statutory obligations that a school is subject to – further details about these are available from our Data Protection Officer.**
- Article 6(e) - Public Interest

In addition, concerning any special category (personal data that needs more protection because it is sensitive, please see our legal conditions for processing document for information about special category data) data of [GDPR - Article 9](#) :

- Article 9(2g) - Processing is necessary for reasons of substantial public interest

Data Protection Act 2018 part 2 schedule 1;

- 8 - Equality of Opportunity or Treatment
- 18 - Safeguarding Children and Individuals at Risk

2.5 How we collect pupil information

We collect pupil information via admission forms completed by parent/carer when a student joins our school, data collection forms, CCTV cameras, information provided by; parent/carer, the previous school/provisions, local authorities, NHS, Police, the Department for Education (DfE) and by secure file transfer Common Transfer File (CTF).

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. We will let you know, when we ask you for data, whether you are required to provide the information and your rights in relation to this.

2.6 How and where we store pupil information

We securely store workforce information on the School's IT network. Secure storage is provided for paper based records. We hold 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: **[Insert link to retention document]**

We are currently following the instructions of the Independent Inquiry into Child Sexual Abuse (IICSA) which states that student records should not be destroyed until this inquiry is complete.

2.7 Who we share pupil information with

We routinely share pupil information with:

- Schools that the pupils attend after leaving us
- Feeder schools
- Our local authority
- Other relevant local authorities
- Our Governing Body
- The Department for Education (DfE) Inc. Learner Record Services and the National Pupil Database
- Police
- NHS (agencies and services)/School Nurse
- External systems used by the School to carry out day to day processes and requirements. For example, and not limited to; SIMS, Teachers to Parents, parent portal – Insight, ParentMail.

Please see the attached Appendix for a full list of the third parties we share with.

2.8 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.

2.8.1 Youth support services & Careers advisors

For more information about services for young people, please visit our local authority website.

2.8.2 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.

2.8.3 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.

2.9 Requesting access to your personal data, and other rights

Under data protection law, pupils have the right to request access to information about them that we hold, and in some cases, parents can make the request on the pupil's behalf. Parents also have the right to access their child's educational record.

You also have the right to:

- be informed about the collection and use of your personal data.
- rectification, ie to have inaccurate personal data rectified, or completed if it is incomplete.
- erasure, often known as the 'right to be forgotten'; however, this does not apply where, amongst other things, processing is necessary to comply with a legal obligation.
- restrict processing, although, as above this is a limited right.
- data portability where applicable.
- object; though other than for marketing purposes, this is also limited as above.
- Where we rely on your consent to process your data, you have the right to revoke that consent.
- You also have rights in relation to automated decision making and profiling, though these are not currently relevant
- Finally, the right to seek redress, either through the ICO, or through the courts

If you would like to request access to your data, or use any of the other rights listed above, please contact the school office in the first instance.

2.10 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)

2.11 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>

2.12 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>

2.13 Sharing by the Department

The law allows the Department to share pupils' personal data with certain external, 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>

2.14 Learner Records Service

Not applicable to primary education.

2.15 Contacts

If you have a concern about the way we are collecting or using your personal data or you would like to discuss anything in this privacy notice, we ask that you raise your concern with us in the first instance.

Please contact the School Office, Headteacher or School Data Protection Officer:

Data Protection Officer Name: GDPR for Schools, Derbyshire County Council
DPO Email: gdprforschools@derbyshire.gov.uk
DPO Phone: 01629 532888
DPO Address: Room 396, North Block, County Hall, Smedley Street, Matlock, Derbyshire, DE4 3AG

For Derbyshire County Council:

Information Governance Officer
Children's Services Department, Derbyshire County Council
Room 361
County Hall
Matlock
Derbyshire
DE4 3AG
Email: cs.dpandfoi@derbyshire.gov.uk
Telephone: 01629 532011

For DfE:

Public Communications Unit,
Department for Education,
Sanctuary Buildings,
Great Smith Street,
London, SW1P 3BT
Website: www.education.gov.uk
<https://www.gov.uk/contact-dfe>
Email: <http://www.education.gov.uk>
Telephone: 0370 000 2288

If however you are dissatisfied with our response to your concerns you can of course contact the ICO quoting our ICO registration number **Z6566393** and stating that the Data Controller is **Spire Junior School**.

Information Commissioners' Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number
Fax: 01625 524 510

Website: <https://ico.org.uk/concerns/>

Appendix – Supplier List

Supplier Name	Product Name	Purpose
123Comms Ltd	ParentMail	Payment and Messaging
Adobe Systems Software Ireland Limited	Adobe Photoshop	iPad App
	Adobe Spark	
Apple Inc	Apple School Manager	These are applications on our school ipads that we use to promote learning
	Apple iCloud	
	AppleID	
	Classroom	
	Garage Band	
	iMovie	
	Keynote	
	Numbers	
	Pages	
Volume Purchase Program		
Capita Business Services Ltd	SIMS ID	Our Email system
Cardinal Blue Software Inc t/a Pic Collage	Pic Collage	iPad App
Charanga Ltd	Musical School	Our Music Program
CHG-Meridian Computer Leasing UK Ltd	CHG	iPad Leasing
Classroom Secrets Ltd	Classroom Secrets	Teaching Resources
Cool Milk at School Ltd	Cool Milk	Our milk provider
Data Tools for Schools Limited	Data Tools for Schools	Online Resource
Department for Education (DfE)		Our Government Department
Derbyshire County Council		Our local authority
Direct Business Systems Ltd	Direct Business Systems_Print Management	Reprographics
Doublestruck Ltd	Testbase	SATs Test Style Questions
Edenred (UK Group) Limited	Edenred	FSM Voucher
Eedi Ltd	Diagnostic Questions	iPad App
EZ Education Ltd	DoodleMaths	iPad App
Fingerlab SARL	iMotion	Animation App
First News (UK) Ltd	FirstNews	Reading Comprehension Activities

H Tempest Limited	H Tempest Ltd Photography	Our school photographer
InVentry Limited	InVentry Sign In Solutions	Visitor Electronic sign in/out
Kahoot! AS	Kahoot!	iPad App
Masquerade Technologies Inc	MSQRD	Photo Editing Software
Massachusetts Institute of Technology	Scratch	Programming Software
Maths Circle Ltd	Times Table Rockstars	Times Tables Website and App
Microsoft UK	Active Directory	Used for electronic calendars, emails, document storage, remote meetings etc.
	Forms	
	Office	
	Office 365	
	OneDrive	
	SharePoint	
	Silverlight	
Teams		
Minecraft	Minecraft Education Edition	After School Club use
One Team Logic Limited	MyConcern	Safeguarding Tool
Ricoh Europe PLC	Ricoh	Our photocopying services
RM Education Ltd	RM Integris	Management Information System
	TTS Group	Educational Supplies
Seesaw Learning Inc	Seesaw	Learning Platforms to share pupil's work
	Seesaw: The Learning Journal (app)	
Shadow Puppet Inc	Shadow Puppet	iPad App
Sparx Ltd	Sparx	Maths Teaching Resource
The Education Shed Ltd (prev. The Spelling Shed)	Literacy Shed +	Teaching Resources
	Maths Shed	Interactive Maths/ Spellings
	Spelling Shed	
The Key Support Services Limited	The Key for School Governors	Information Tool for Education
	The Key for School Leaders	

Twinkl Limited	Twinkl	Teaching Resources
Wrates Scholastic Photographs Limited	Wrates Photographs	Our School Photographer
Young Voices	Young Voices	Annual Music Event