

## Privacy notice for pupil information

Alwyn Infant School and Courthouse Junior School are the Data Controllers for the use of personal data in this privacy notice.

Satswana Limited is the Data Protection Officer. Their details are;

Office Address: Pembroke House, St Christopher's Place, Farnborough, Hampshire, GU14 0NH

Telephone Number: 01252 516898

Email address: [info@satswana.com](mailto:info@satswana.com)

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

- Personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- Characteristics (such as ethnicity, language, and free school meal eligibility)
- Safeguarding and child protection information (such as court orders and professional involvement)
- Welfare, safeguarding and child protection information where this is relevant to, impacts on and/or is otherwise necessary to protect and support the pupil participation in school clubs and off-site activities
- 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 (attainment and progress)
- Behavioural information (such as suspensions and any relevant alternative provision put in place)
- Photographic records of pupils' engagement in school activities both on and off-site
- Personal information of parents/carers and other family members with parental responsibilities/emergency contact roles (such as name, address, telephone numbers, email details, special contact information/restrictions, names of siblings/other significant relationships where appropriate/necessary)
- Communications with parents/families
- Records of payments made/due to the school in relation to co-curricular activities (where payable), meals and other supplies
- Photographic records of school events in which parents/others may appear
- CCTV information

### **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

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

- for the purposes of (a), (b), (c) & (d) in accordance with the legal basis of Public task: collecting the data is necessary to perform tasks that schools are required to perform as part of their statutory function

- for the purposes of (e) in accordance with the legal basis of Vital interests: to keep children safe (food allergies, or medical conditions)
- for the purposes of (f) in accordance with the legal basis of Legal obligation: data collected for DfE census information:
  - Section 537A of the Education Act 1996
  - the Education Act 1996 s29(3)
  - the Education (School Performance Information) (England) Regulations 2007
  - regulations 5 and 8 School Information (England) Regulations 2008
  - the Education (Pupil Registration) (England) (Amendment) Regulations 2013

In addition, concerning any special category data:

- In the case of ethnicity and fingerprint information: condition a: the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject.

### **How we collect and use pupil information**

We obtain pupil information via registration forms when they enrol. In addition, when a child joins us from another school through an in year transfer, we are sent a secure file containing relevant information. Whilst most of the pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with GDPR 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 and we will tell you what you need to do if you do not want to share this information with us.

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

We hold pupil data securely for the set amount of time shown in our data protection policy.

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

We routinely share pupil information with:

- school that the pupil attends after leaving us
- ours and other local authorities
- the Department for Education (DfE)
- Schools, other educational settings, and other professionals who are providing educational, behavioural and/or welfare support to our pupils
- External agencies where we have a safeguarding and/or child protection concern
- CPOMS (Child Protection Online Management System) for monitoring safeguarding, wellness and pastoral issues.
- When requested to do so by the police
- School catering provider
- Anonymised information on entitlement to Pupil Premium, SEND (Special Educational Needs & Disability) support, EHCP (Education, Health & Care Plan), assessment, progress, attendance and behaviour, with governors, OFSTED (Office for Standards in Education) inspectors, and other education inspectors/advisers
- Names/log-in details with providers of education platforms that pupils use in school to support their learning
- Third party providers of co-curricular activities both on and off-site
- Photographic material is used on our website and school publicity material
- School nurse/NHS
- Behavioural support
- School clubs
- Cool Milk
- School photographer
- Entry-Sign (school signing in/out system)

- Wonde/Welfare Call
- Parent Pay (CYPAD – school lunch ordering)
- Auditor for School Fund accounts
- BromCom – School Information Management System
- Maths Circle (Numbots and Times Tables Rockstars)

### **Why we routinely 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:

- To safeguard and protect pupils and other vulnerable individuals in accordance with our Safeguarding and Child Protection policies and the Keeping Children Safe in Education Regulations and our local Safeguarding Children’s Board regulations to protect pupils and other vulnerable individuals for harm.
- To ensure pupils with medical needs are properly supported and their needs met
- To enable us to access funding and other support to enable pupils to access school and the curriculum in accordance with our equalities obligations
- To enable us to provide services to our pupils/families (such as meals), before and after school clubs, co-curricular activities, and events/trips
- To enable us to administer contracts of employment and third-party supply contracts
- To enable us to provide appropriate and properly protected IT services to pupils
- To enable us to manage our school budget and plan appropriately
- To enable us to properly monitor and assess the effectiveness of the teaching and learning in the school
- To celebrate the achievements of our pupils
- To ensure that receiving schools can support and provide for the needs of pupils leaving our school
- To comply with our equalities obligations
- To comply with our obligations to account for and monitor the impact of Pupil Premium and Sports Funding.

### **Department for Education**

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 data collections, under:

- Section 537A of the Education Act 1996
- the Education Act 1996 s29(3)
- the Education (School Performance Information)(England) Regulations 2007
- regulations 5 and 8 School Information (England) Regulations 2008
- the Education (Pupil Registration) (England) (Amendment) 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.

### **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 given access to your child’s educational record, contact the school office.

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/>.

### **Withdrawal of consent and the right to lodge a complaint**

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the school office.