

Alderman’s Green Community

Primary School

**Privacy Notice for Parents and Pupils**

**Date Approved by Governors**

**Privacy Notice for Parents and Pupils**

**How we use pupil information**

**Who are we?**

**Alderman’s Green Community Primary School** is the ‘data controller’. This means we are responsible for how your personal information is processed and for what purposes.

Alderman’s Green Community Primary Schoolis registered as the Data Controller with the Information Commissioner’s Office (ICO); Registration Number: Z6559851. You can contact the school as the Data Controller in writing at: Alderman’s Green Road, Coventry CV2 1PP or [admin@aldermansgreen.coventry.sch.uk](mailto:admin@aldermansgreen.coventry.sch.uk) .

**What is a Privacy Notice?**

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our pupils and parents.

**What is a Personal Information?**

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller’s possession or likely to come into such possession.

‘Special category’ personal information relates to personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person, data concerning a natural person’s sex life or sexual orientation.

**Categories of pupil information that we process include:**

* personal identifiers and contacts (such as name, unique pupil number, contact details, address and photograph)
* 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 EYFS, key stage and phonics results, monitoring information)
* behavioural information (such as exclusions and any relevant alternative provision put in place)
* CCTV images captured in school.

**Why we collect and use pupil information**

We collect and use pupil information, for the following purposes:

1. to support pupil learning
2. to monitor and report on pupil attainment progress
3. to provide appropriate pastoral care
4. to assess the quality of our services
5. to keep children safe (food allergies, or emergency contact details)
6. to meet the statutory duties placed upon us
7. to share medical information with public health agencies

**What are the legal reasons for us to process your personal information?**

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. The lawful reasons we have for processing personal information are as follows:

1. To comply with the law

We collect and use general purpose pupil information in order to meet certain legal requirements and legal obligations placed upon the school by law. We therefore are required to this process personal information for such purposes even if you have not consented to us doing so. Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1. If you would like a copy of or further information regarding the statutory authorities that underpin our legal obligations, you should contact the school in writing.

1. To protect someone’s vital interests

We are able to process personal information when there is an emergency and/or where a person’s life is in danger. Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

1. With the consent of the individual to whom that information ‘belongs’

Whilst much of the personal information processed is in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used. Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

1. To perform a public task

It is a day-to-day function of the school to ensure that children receive the education and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that pupils are properly educated and supported Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

**Special category personal information**

In order to process ‘special category’ data, we must be able to demonstrate how the law allows us to do so. In additional to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

1) Explicit consent of the data subject

2) Processing relates to personal data which is manifestly made public by the data subject 3) Necessary for establishing, exercising or defending legal claims

4) Necessary for reasons of substantial public interest

5) Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health

6) Necessary for archiving, historical research or statistical purposes in the public interest

The lawful reasons for each type of special category personal information data that we process is set out in the tables attached.

**How we collect pupil information**

We collect pupil information via registration forms at the start of the school year, or upon admission to the school, Common Transfer Files (CTF) or secure file transfer from previous schools.

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.aldermansgreen.coventry.sch.uk**](http://www.aldermansgreen.coventry.sch.uk)

**Who we share pupil information with**

We routinely share pupil information with:

* schools that the pupils attend after leaving us
* our local authority
* the Department for Education (DfE)
* Local Public Health team
* NHS Test and Trace

Please refer to the tables for information about what personal information is shared with which specific third parties.

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

**NHS Test and Trace/Public Health Agencies:**

It may be necessary for us to share limited information with the above agencies in the event that an individual tests positive for Coronavirus, or it there is a Coronavirus outbreak. This will enable to the named agencies to liaise with families to provide advice and support, and to take appropriate steps in responding to an outbreak. You have the right to object to the sharing of information with such agencies. This is not an absolute right and will be assessed on a case by case basis.

**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](https://www.gov.uk/government/publications/security-policy-framework).

## What are your rights with respect of your personal information?

## Under data protection law, 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 to have access to your child’s educational record, contact the School Data Protection Officer at Warwickshire Legal Services via email: [schooldpo@warwickshire.gov.uk](mailto:schooldpo@warwickshire.gov.uk) or alternatively;

## School Data Protection Officer

## Warwickshire Legal Services

## Warwickshire County Council

## Shire Hall

## Market Square

## Warwick CV34 4RL

## \*\*Please ensure you specify which school your request relates to.

## 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

## • claim compensation for damages caused by a breach of the Data Protection regulations

## 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/Contact

**School Contact Details**

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

School Business Manager – **Jenny MacDonald**, Alderman’s Green Community Primary School, Alderman’s Green Road, Coventry CV2 1PP or email [admin@aldermansgreen.coventry.sch.uk](mailto:admin@aldermansgreen.coventry.sch.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>

## 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 suppliesdata on around 600 pupils per yearto 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>

Table 1 – Personal information we are required to process to comply with the law. This list may not be exhaustive.

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Information Type | Relevant legislation | Special Category– additional lawful reason | Third Parties with whom we share this information (this list is not exhaustive)- | Lawful reason for sharing |
| Attendance Information | Education (Pupil Registration)(England) Regulations 2006, Regulation 4, 10, 11 |  | Local Authority, DFE, OFSTED, | Legal Obligation |
| Pupil Information, such as name, date of birth. | Education (Information About Individual Pupils) (England) Regulations 2013, Regulation 3 and 5 |  | DFE, Local Authority, the child’s new school.  Public Health Agencies  NHS Track and Trace | Legal Obligation |
| Educational Record | Education (Pupil Information) (England)Regulations 2005, Regulation 5 |  | AGCPS staff/ SIMS/ Local Authority/ DFE, Parents, OFSTED | Legal Obligation |
| Admissions Register | Education (Pupil Registration)(Engl and) Regulations 2006, Regulation 4, 10, 11, 14 and 15 |  | AGCPS staff/ SIMS/ Local Authority/ DFE, OFSTED | Legal Obligation |
| Common Transfer File | Education (Pupil Registration)(Engl and) Regulations 2005, Regulation |  | Online record of pupil information and educational record transferred electronically to a child’s new school. | Legal Obligation |
| SEN Report / EHCP Plans | Children’s and Families Act 2014 – part 3  (SEND Code of Practice 2015) |  | Local Authority/ DFE | Legal Obligation |
| Attainment | Education ( Pupil Information)(England) Regulations 2005 |  | Local Authority/ DFE | Legal Obligation |
| School Census | Education Act 1996, Sections Department of Education Statutory Requirement 6 537 & 537A, and accompanying regulations |  | Department for Education / Local Authority | Legal Obligation |
| Safeguarding information | Education Act 2002, section 175 Children’s Act 1989, Section 17, 47, 83. Children’s Act 2004, Section 11 |  | Local Authority Safeguarding Team, Social Services, police | Legal Obligation |
| Medical / Dietary / allergies | Children & Families Act 2014 – Section 100  (Supporting Pupils at Schools with Medical Conditions 2015) | Necessary for preventative or occupational medicine | Department of Education – school census. Other schools – when pupils transfer, Catering Academy, Aspens Catering (school meals service providers, in the case of food allergies and to use online Select meal ordering service) | Legal Obligation |

Table 2 – Personal information we are required to process as it is necessary to protect someone’s vital interests. This list may not be exhaustive.

|  |  |  |  |
| --- | --- | --- | --- |
| Information Type | Special Category - additional lawful reason | Third Parties with whom we may share information (this list is not exhaustive) | Lawful reason for sharing |
| Medical Information | Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent’ | School Nurse/ NHS, Medical staff i.e. paramedics /ambulance, Catering Academy (school meals service provider – in case of food allergy). | Vital Interest |
| Religious belief | Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent’ | Medical staff i.e. paramedics/ambulance | Vital Interest |

Table 3 - Personal information we are required to process with the consent of the individual to whom that information ‘belongs’. This list may not be exhaustive.

|  |  |  |  |
| --- | --- | --- | --- |
| Information Type | Special Category - additional lawful reason | Third Parties with whom we may share information (this list is not exhaustive) | Lawful reason for sharing |
| School Trips |  | Residential trip service providers | Consent |
| Photographs |  | Website, social media including Facebook and Twitter, Etwinning | Consent |
| Childs name, admission number and class |  | Braiswick photographers for official school photographs available to purchase by parents. | Consent |
| SEND Information |  | To enable children with SEND to access the Coventry SEND support services | Consent |

Table 4 - Personal information we are required to process because it is necessary to do so in order to perform a public task. This list may not be exhaustive.

|  |  |  |  |
| --- | --- | --- | --- |
| Information Type | Special Category - additional lawful reason | Third Parties with whom we share the information (this list is not exhaustive) | Lawful reason for sharing |
| Attainment |  | DC Pro, 2 Simple, Provision Mapping, OFSTED, Parents, | Legal Obligation and Public Task |
| Pupil Information such as name and date of birth. |  | Capita (SIMS), Schoolcomms (payments and trips online resources),  Evolve (trips risk assessment),  Cool Milk (free milk for under 5s).  Online resources service providers: To enable us to deliver high quality education and track/assess progress: Capita Junior Librarian, Class Dojo, Accelerated reader, Cornerstones, Educator, Edukey, Quizlet, EdShed, Classroom Monitor, Poisson-rouge, Datamove Cloud (Cygnets and Nursery manager admin resource). Schoolcloud (parents evening), Language Screen (provided by the DfE)  Resources to help pupils get full benefit of educational resources: school nursing service, Thrive, NHS, MGSS, Speech and Language therapists, SEND services.  Other agencies: Police, social services, Legal Services, Paramedics/NHS. | Public Task |
| Heights & Weight checks – Rec and Yr6  Flu immunizations – Reception – Yr4  Reception Eye tests  Dental screening -(random selection pupils, various years) | Necessary for medical or social care or public health reasons | NHS Trust, School Nursing Service | Public Task |
| SEN information |  | Thrive, Education psychologists, MGSS, Speech and Language therapist. Local Authority, DfE, Ofsted. | Public Task |
| Pupil emergency contact information such as name, address and telephone number |  | Social Services (in referral cases where a child has not been collected. | Public Task |
| Parent name, address and telephone number |  | Social services (in referral cases where a child has not been collected). | Public Task |
| Parent email address and mobile number |  | Schoolcomms – online payment and trips system. Schoolcloud (parents evening) | Public Task |