

## **Privacy Notice (How we use pupil information)**

### **Why do we collect and use pupil information?**

We collect and use pupil information under Article 6 and Article 9 of the General Data Protection Regulation.

We use the pupil data:

- To keep pupils safe
- to support our pupil's learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing

### **The categories of pupil information that we collect, hold and share include:**

- Personal information (such as name, unique pupil number, address and contact details)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Contact information (such as address, phone numbers and email)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Assessment information (such as teacher assessment, national curriculum test results, special educational needs)
- Safeguarding information (such as necessary information to keep a child safe)
- Medical information (such as Doctor's, allergies, medical conditions)
- Dietary information (such as intolerances or special preferences)
- Behaviour information (such as exclusions, behaviour incidents, merits)
- SEND information (such as Individual Education Plans, reports from professionals e.g Educational Psychologists)

### **Collecting pupil information**

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us 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.

### **Storing pupil data**

Pupil data is retained for no longer than is required by law and in accordance with the school's Records Management Policy. We hold the majority of pupil data for the time they spend at our school. When a pupil transfers to another school, the pupil record goes with them and is removed from our system. Not all pupil data is covered by this and some elements are retained for longer. SEND and safeguarding information is retained until the child reaches the age of 25. Records are kept securely on our premises.

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

We routinely share pupil information with:

- schools that our pupils attend after leaving us
- local authorities
- the Department for Education (DfE)

- medical professionals
- Capita SIMS (our primary data processor)
- SchoolComms (our processor for communication and payments)
- School staff (for monitoring and moderated progress)

We also share basic information (first name and occasionally date of birth) with third-party curriculum providers. These providers help us fulfil our duty as a school to provide high quality education. This is done under strict privacy assurances that these third-party providers apply the same privacy standards that we do.

For third-parties that currently process personal information – all privacy notices have been verified. For further information, please go to the third-party website for each specific privacy policy.

Capita SIMS (Primary data processor for administration – student records and contact information)  
 Microsoft Office 365 (used for email)  
 School Comms (for processing cashless payments)  
 Tempest Photography (school photographs)  
 School Pupil Tracker (recording assessment data)  
 MicroLibrarian (library system)  
 Accelerated Reader (reading assessment)  
 Athletics (maths assessment)  
 Tapestry (recording Early Years assessment information)  
 Spelling Shed (spelling assessment)

### **Why we 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 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 our local authority (LA) and the Department for Education (DfE) under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

We also share basic pupil information (typically first name, date of birth, class) with providers of curriculum content online; we do this to enrich our curriculum and to support us in delivering education to your child. This is part of our legal obligation to teach children; please see the previous section for the current third parties with whom we share information.

### **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)**

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 pupil information we share with the department, for the purpose of data collections, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

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:

- conducting 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/publications/national-pupil-database-requests-received>

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

### **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 the Data Protection Officer at the school address or by email to:

[admin@willowbrook.devon.sch.uk](mailto:admin@willowbrook.devon.sch.uk)

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:**

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

- The Data Protection Officer  
Willowbrook School  
Summer Lane  
Exeter  
EX4 8NN  
01392 466208