



## **Harnham Infant School Privacy Notice**

(How we use pupil information)

### Introduction:

Harnham Infant School prides itself in the safe environment in which it has created for; it's pupils. We know that the protection of yours and your children's data is important.

We will ensure that the personal data that is collected, processed and stored is done so in accordance with the European General Data Protection Regulation and the Data Protection Act 2018.

The following notice is designed to inform parents and guardians of the personal data that we collect, process and store regarding our pupils.

When we collect data from you we will set out why we need the data, how we will process it and how to contact us if you require any amendments, access to data or deletions.

If you would like any further information please contact the Headteacher, Miss Natasha Dorrington or the school's Data Protection Officer 01722 327338.

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 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, tracking systems used internally)
- behavioral information (such as exclusions and any relevant alternative provision put in place)
- Photographs (used to evidence learning, inform parents on activities and for displays)

- Clubs (such as name, parent contact details)
- SIMS Agora

This list is not exhaustive, to access the current list of categories of information we process please contact the Miss Natasha Dorrington, Headteacher, Harnham Infant School, 01722 327338 or the school's Data Protection Officer.

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

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 for DfE data collections

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

- for the purposes of **the support of student learning** in accordance with the legal basis of **necessity for compliance with a legal obligation and with the processing condition that it is necessary for substantial public interest.**
- for the purposes of **monitor and report on pupil attainment progress** in accordance with the legal basis of **necessity for compliance with a legal obligation and with the processing condition that it is necessary for substantial public interest.**
- for the purposes of **provide appropriate pastoral care** in accordance with the legal basis of **necessity for compliance with a legal obligation and with the processing condition that it is necessary for substantial public interest.**
- for the purposes of **assessing the quality of our services** in accordance with the legal basis of **necessary for a public task and with the processing condition that it is necessary for substantial public interest.**
- for the purposes of **keeping children safe** in accordance with the legal basis of **necessity for compliance with a legal obligation and with the processing condition that it is necessary for substantial public interest.**

- for the purposes of **meeting statutory duties** in accordance with the legal basis of **necessity for compliance with a legal obligation and with the processing condition that it is necessary for substantial public interest.**

**In addition, concerning any special category data:**

Special category data is defined as personal data 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 purposes of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

**conditions for processing:**

(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;

(b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;

(c) processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;

(d) processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects;

(e) processing relates to personal data which are manifestly made public by the data subject;

(f) processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;

(g) processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject;

(h) processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3;

(i) processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy;

(j) processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

### **How we collect pupil information**

We collect pupil information via several channels, including but not limited to; registration forms, consent forms, previous schools, nurseries, other public authorities and medical practitioners.

We collect this information via secure means such as encrypted files, common transfer files, secure email and paper-based forms that are collected and stored in a secure environment with restricted access.

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 contact Miss Natasha Dorrington.

### **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)
- medical care providers

### **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.

Some services provided by the school are provided by third parties. The third parties such as medical care providers are carefully selected to ensure appropriate safeguards are in place to protect the integrity and confidentiality of our pupil's data.

## **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.

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.

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.

### **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 Miss Natasha Dorrington, Headteacher or the schools Data Protection Officer on 01722 327338

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
- a right to seek redress, either through the ICO, or through the courts

If you have a concern or complaint 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: Miss Natasha Dorrington, Headteacher or the schools Data Protection Officer on 01722 327338