



# Putteridge Primary School

## Privacy Notice

Putteridge Primary School is committed to protecting your privacy when you give us your personal data and that of your child.

We have a Data Protection Officer who makes sure we respect your rights and follow the law. If you have any concerns or questions about how we look after your personal information, please contact the Data Protection Officer at [feedback@luton.gov.uk](mailto:feedback@luton.gov.uk)

Data Controller	Colin Pickard, Headteacher
Data Protection Officer	Paula Creighton, SPT Compliance Limited <a href="mailto:enquiries@putteridgeprimaryschool.org.uk">enquiries@putteridgeprimaryschool.org.uk</a> (marked for the attention of Paula Creighton)
Personal Data	Name; Address; Medical details; Ethnicity
Purpose for using it	E.g. to support your child's learning and pastoral needs To provide access to school meals
Lawful basis	We collect and use pupil information under the lawful basis of public interest and for special category data (such as religion, ethnicity and medical information) because it is necessary for a reason of substantial public interest.
Who we share it with	Luton Borough Council Department for Education (DfE) Online Education Providers NHS Schools that pupil's attend after leaving Putteridge Primary School Emergency services
Why we share it with them	Statutory returns for Government reporting and funding. Educational Psychologist/Luton Borough Council Pastoral Support [if needed] Provision of School Meals To Safeguard children [if needed]
Any automated decision making	None
Transfer of data to a non-EU country	None
Exercising your rights	You have the right to ask us to amend or delete your data as well as transfer it or limit its use. You also have the right to request a review of an automated decision where you think this is wrong.  Each request will be considered individually however, where we are required to keep your data by law we may be unable to action your request. In all circumstances we will explain our decision making in writing to you

If you want more information about how we keep your data safe please see our main privacy statement at [www.putteridgeprimaryschool.org.uk](http://www.putteridgeprimaryschool.org.uk)

## Privacy Notice (How we use pupil information)

Putteridge Primary School is the data controller. We collect and use your data and that of your child. This notice explains what we collect, why and how we use it.

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

- Personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- Medical and administration (such as doctors' information, child health, dental health, allergies, medication and dietary requirements)
- Characteristics (such as ethnicity, language, and free school meal eligibility)
- Special Educational Needs (including needs and ranking)
- Attendance information (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- Assessment and attainment information (such as key stage 1 and phonics results and special educational needs information, if relevant)
- Safeguarding information (such as court orders and professional involvement)
- Behavioural information (such as exclusions and any relevant alternative provision put in place)

### Why we collect and use this information

We collect and use the 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 (food allergies or emergency contact details)
- to comply with safeguarding obligations
- to record all information on ScholarPack
- to meet statutory duties placed upon us for the Department of Education (DfE) data collections

### The lawful basis on which we use this information

Under the [UK General Data Protection Regulation \(UK GDPR\)](#), we collect and use pupil information under the lawful basis of public interest and for special category data (such as religion, ethnicity and medical information) because it is necessary for a reason of substantial public interest.

Some of the information we collect and use is provided with your consent and that is the lawful basis for us processing it. For example, your permission to process your child's data for school trips and for access to online providers of educational materials. We will make it clear where we are asking for your consent and why, and provide you with the opportunity to refuse to provide us with that information, explaining what the consequence of that will be.

The following key documents provide the main framework for information sharing:

- **GDPR & Data Protection Act 2018** – The main legislative framework for confidentiality and information sharing issues. The legislation stipulates the principles that must be followed when personal or special category data is processed by organisations. The legislation stipulates the conditions under which information may be shared.

- **Human Rights Act 1998** – This Act incorporates Article 8 of the European Convention of Human Rights which provides that everyone has the right to respect for their private and family life, home and correspondence.
- **Children Act 1989 & 2004** -The Acts stipulate requirements to safeguard and promote children's welfare, along with agencies working together to enable this.
- **Working Together to Safeguard Children 2018** - statutory guidance setting out what organisations and agencies that have functions relating to children, must and should do to safeguard and promote the welfare of all children and young people under the age of 18 in England.
- **Keeping Children Safe in Education 2021** - The guidance sets out what *schools* and colleges in England must do to safeguard and promote the welfare of *children* and young people under the age of 18.

### Collecting pupil information

We collect pupil information via registration forms at the start of the school year or Common Transfer File (CTF) or secure file transfer from a previous school.

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 and we will tell you what you need to do if you do not want to share this information with us.

### Storing pupil data

We hold pupil data securely for the length of time the pupil is on roll. This is a set amount of time shown in our data retention schedule.

### Who we share pupil information with

We routinely share pupil information with:

- schools that the pupil's attend after leaving us
- our local authority
- the Department for Education (DfE)
- online education providers
- support staff
- NHS
- School Nurse

### 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.

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 share other pupil data to ensure that they receive the most appropriate educational and pastoral support for their needs. We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

## 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:

### 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 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>

### 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 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 School Business Manager, Cecilia McCarthy at [enquiries@putteridgeprimaryschool.org.uk](mailto:enquiries@putteridgeprimaryschool.org.uk), marking the email for her attention.

Depending on the lawful basis above, you may also have the right to:

- to ask us for access to information about you that we hold

- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

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/>. For further information on how to request access to personal information held centrally by DfE, please see the 'How Government uses your data' section of this notice.

### **Last updated**

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated on **7<sup>th</sup> June 2024**.

## **Contact**

If you would like to discuss anything in this privacy notice, please contact: School Business Manager, Cecilia McCarthy at [enquiries@putteridgeprimaryschool.org.uk](mailto:enquiries@putteridgeprimaryschool.org.uk), marking the email for her attention.

### **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 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>

### **How to find out what personal information DfE hold about you**

Under the terms of the Data Protection Act 2018, you are entitled to ask the department:

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the department, you should make a 'subject access request'. Further information on how to do this can be found within the department's personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

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