



## **Privacy notice for pupils at St Peter's Primary School and their parents/carers**

**This document gives you detailed information about how we use your personal data and complies with the EU General Data Protection Regulations. The latest version of this privacy notice is available on our web site.**

Your privacy is critically important to us. We follow a few fundamental principles as to how we use data:

- We are thoughtful about the personal information that we ask you to provide.
- We carefully consider the ways that we use and store your personal information.
- We share your data only when we need to.
- We take steps to ensure that the organisations with whom we share your information understand that your privacy is critically important.
- We aim to store personal information for as long as we have a reason to keep it and not longer than this.
- We believe in full transparency on how we gather, use, and share your personal information.
- We never sell your personal data to anyone.

### **1 – Whose data do we process?**

We process personal data relating to those who are registered pupils at our school, and their parents and carers. We may also receive data about pupils from a variety of sources including previous schools or nurseries, local authority, external agencies such as hospitals, the Department for Education and the Learning Records Service.

### **2 - Why do we process your data?**

As a school, we operate in the public interest to provide all of our pupils with an education, pastoral care and support for their next steps when they leave us. We are also required by law to share some information with the Department for Education (DfE). In order to safely and legally run the school and to meet our legal obligations to the DfE, it is necessary for us to store and process data about both pupils and their parents and carers. If we do not process this data:

- We may be unable to provide pupils with an education or pastoral care.
- We may be unable to keep parents and carers informed about pupil's education and support.
- We may be unable to enter pupils for external examinations or assessments.
- We may be unable to assess the quality of our services.
- We may be unable to meet legal obligations on us as a school or comply with the law regarding data-sharing.

In addition to this, we may contact all parents/carers to remind them that voluntary donations can be made towards funding the school through ParentPay and we have a legitimate interest in doing so. All voluntary donations are used towards the running of the school to the benefit of all pupils. We may retain alumni photographs which are displayed within our school and displays of past pupils' achievements. We have a legitimate interest in storing this data to help maintain and conserve the past history and culture of the school.

Your data is processed for the following reasons:

- Supporting and managing the learning needs of our pupils
- Providing appropriate pastoral care and meeting pupils' welfare needs

- Providing wrap-around care at the on-site breakfast club and after-school club
- Complying with statutory assessments
- Monitoring and reporting on pupil progress
- Enabling parents and carers to be kept informed about their children's education
- Assessing the quality of our services
- Administrating and running educational trips and visits
- Undertaking fundraising for the school through sending out SPSA communications
- Maintaining accounts, running of the school and management of school property
- Complying with laws on data-sharing, safeguarding and children missing from education
- Ensuring security and preventing crime through the use of CCTV
- Providing supporting information for the application of Free School Meals
- Enriching our culture and partnership with parents and celebrating achievements and events
- Managing catering services for all our pupils including handling dietary requirements and choices
- Contributing to a sense of belonging and developing an inclusive learning environment throughout the school site
- Marketing the school and Folio Education Trust online and in wider marketing materials

The data that we require about your child includes some sensitive data.

*Sensitive data that we **must** know about*

- You ***must*** tell us about a pupil's health or medical conditions.
- As a school, we operate in the public interest to educate children. We must provide the right level of care and support for all of our pupils. We would be unable to keep children safe without processing some essential health-related information to enable us to do that.
- If we were unable to store or process this information, we would be unable to meet the learning or welfare needs of our pupils.

*Sensitive data that you **do not have to share** with us*

- Some sensitive data is shared with us ***optionally*** e.g. ethnicity. This data is held and processed only because both pupil and parent or carer have consented and agreed to share this data with us.
- You do not have to share this with us. You can change your preference at any time by contacting the school. You can also request for this to be deleted and in doing so, this will not affect our ability to provide your child with an education.

### **3 – What data do we process about pupils and families?**

The personal data that we hold and process may include:

- Personal details, including names, date of birth, home address, parents and carers contact details, pupil photographs, passport numbers and unique learner numbers
- Personal characteristics (such as ethnic group, religion, country of birth, language, free-school meal eligibility, looked-after status)
- Information relating to National curriculum assessment
- Attendance and absence information
- Pastoral welfare, behaviour commendations, disciplinary incidents and exclusions information within our school (and any similar information received from previous school files)
- Leavers' destinations and alumni contact details
- Photographic, audio or video material of pupils
- Child protection and safeguarding
- Details of special educational needs and disabilities including education, health and care plans, medical impairments, GP details, social, emotional and mental health needs
- Dietary requirements and choices
- Health and safety information relating to accidents or incidents involving our pupils

#### 4 – How do we share your data?

Information sharing takes place on a routine basis as part of our usual school processes.

- The first table below summarises how data may be shared with third parties, including which data is shared and why it is shared.
- In exceptional or extraordinary circumstances, there may be cases where additional information is shared about a particular pupil and these are detailed in the second table.

**TABLE 1 - ROUTINE SHARING**

Who Data may be Shared With	What Data is Shared	Reason for Sharing
Local authority – School admissions	Pupil name, date of birth, home address, parent or carer details, school application reference number and unique pupil number, EHCP and SEND information	To administrate school admissions
Local authority - Youth support service	Pupil name, address, date of birth, names and addresses of parents and carers	To meet legal requirements. Parents can request sharing is restricted to pupil's name, address and DOB.
Local authority – Health & safety Department	Pupil name, date of birth, home address, parent or carer telephone details	To track incidents where an accident form was completed after a health and safety incident involving a pupil or member of staff
Local authority – Education department	Pupil name, date of birth, address, date of leaving and destination, attendance marks, exclusion period and reason and parent or carer telephone details	To comply with legal obligation on the school to share information with local authority in respect of safeguarding, promoting welfare and reporting children missing from education
Learning records service	Pupil name, date of birth, address	To obtain unique learner numbers (UPN/ULN)s which are a means of uniquely identifying each child
Department for Education (DfE) - census	All census data fields as listed in Department for Education (DfE) document "School census 2017 to 2018" pp. 33-38 <sup>1</sup>	<p>We are required to provide information about you to the DfE as part of data collections such as the school census. Under the Education Act 1996, the DfE requires all schools to submit data about all pupils and the school staff as part of a termly census.</p> <p>Some of this information is then stored in the DfE's National Pupil Database, which provides evidence on how schools are performing. This, in turn, supports research. The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards and others.</p>

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Who Data may be Shared With	What Data is Shared	Reason for Sharing
		The Department for Education may share information from the database with other organisations which promote children's education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data.
Department for Education - DfE (end of KS2 assessment)	Pupil name, date of birth, special educational needs and/or personal circumstances which may affect exam performance	To assess the pupils' progress and attainment in external examinations
Other schools when a pupil transfers	A standard transfer file is sent securely via the Department for Education (DfE)'s designated web service and hard copies of the pupil record may be sent on.	To pass on information to a destination school or college when a pupil transfers
School Journey Venues	Pupil name, date of birth, passport details if relevant, medical issues, dietary requirements, next of kin contact details, SEND, behaviour	To administrate school trips and visits
Cashless payments provider - ParentPay	Pupil name, parent or carer email address, free school meal entitlement, home address	To enable the school to operate payments electronically for services such as lunches or school trips
Photography provider	Pupil name, visual image, class or year group	To take photographs of pupil in school
School Nursing Provider – School-attached nurse	Pupil name, date of birth	To administrate and undertake immunisation programme
Sports events management provider – Croydon sports partnership	Pupil name and year group	To administrate sporting events for school pupils
School management information system provider – CAPITA SIMS	SIMS provides our school system that holds most of our pupil data.	To manage and run the school
Internet and network resources provider – London Grid for Learning	Pupil name, date of birth, gender, unique pupil number, year group, parent or carer email address, relationship to child, parent or carer telephone number, attendance, absence and lateness, gifted status, special needs status, description of special needs, admission date, ethnicity, behaviour incidents, details of gifted provision	To enable the school network to operate and for the provision of internet-based services
School mentor	Pupil name, parent details and reason for referral	To allow the mentor to provide a mentoring service for those children identified to benefit from it
Educational welfare officer provider	Pupil name and other information depending on the individual situation	To allow the education welfare service to support families who may require additional help

Who Data may be Shared With	What Data is Shared	Reason for Sharing
Cycling safety awareness provider – cyclinginstructor.com	Pupil name, contact details, behaviour, emergency contact details, SEND, medical information	To provide support for children’s cycling skills and awareness enabling them to ride safely
Mathematics support provider	Pupil name, date of birth, class, attainment level	To provide additional support for mathematics
Reading support provider	Pupil name, date of birth, class, attainment level	To provide additional support for reading
Supplier of system to manage pastoral information, behaviour, SEND and child protection - CPOMS	Name, behaviour, pupil information from SIMS, SEND, pastoral and welfare information and child protection concerns	To support school staff in monitoring behaviour and welfare
Teacher training colleges	Audio and/or visual images or recordings (where consent has been given by pupils and parents/carers)	To provide material for colleges to assess the quality of teaching by teachers who are training within our school.
School counselling provider	Visual image of counselling work (drawing or other work) and/or counsellor’s notes	To allow the counsellor to provide counselling services, which are quality-controlled and supervised by an external supervisor
Visitors to our web site	Visual images, newsletter and pupil achievements	To enrich the culture of partnership with parents and to celebrate achievements and events
Visitors to our school premises for events aimed at parents	Pupil name	To allow the management of events and capturing attendance of events
See-saw	Pupil name, class, visual image and video image	To allow the sharing of classroom information with those parents who have given their consent
Childcare voucher suppliers	All relevant data to allow payment to be made from the supplier to the school through ParentPay	To allow parents/carers to use childcare vouchers to pay for wrap-around care

**TABLE 2 – INFORMATION SHARING IN EXCEPTIONAL CASES**

Who Data is Shared With	What Data is Shared	Reason for Sharing
Local authority – Social and welfare services	Pupil name and other information depending on the concern	To follow safeguarding procedures where there is a concern. We have to share information with social services or other welfare services in certain cases to protect children.
Police services	Pupil name and other information depending on the concern	To follow safeguarding procedures where there are safeguarding concerns about a pupil; To comply with a request from a law enforcement agency where it may harm their investigation if we do not share information; To seek appropriate pastoral support from the police when required

Who Data is Shared With	What Data is Shared	Reason for Sharing
Legal advisors	Pupil name and other information depending on the concern	To gain advice, undertake a legal case or to assist an inquiry or investigation to which the school is a party
Local authorities	Pupil name, date of birth	To establish which borough provides funding for a looked-after child, in the exceptional case when the funding borough is not clear
Health professionals	Pupil name, medical information including GP details and parental contact details	To deal with medical emergencies
CAMHS	Pupil name and other information depending on the concern	To deal with concerns about pupil welfare

We do not share information about you with any third parties that are not listed above without your consent - unless the law requires us to do so.

## 5 – Where is my data stored?

Some of the data we process is stored on school systems only. Our network providers are LGFL and Atomwide; together they are responsible for ensuring security and safety of our managed network. Some data may be stored on the systems of organisations that we share data with, which includes cloud-based service providers. As a school, we enquire from those that we share data with about the processes and policies that providers have in place to ensure that data held on their systems is protected, including where data is transferred outside of the European Economic Area (EEA). There may be international transfer of your data where our suppliers use systems that are hosted in data centres abroad but we always endeavour to ensure that the appropriate privacy protection is in place.

## 6 – How can I see what data you hold about me?

You have a right to access personal information that we hold about you and can do this by contacting the Data Protection Officer.

Miss Sabin Qureshi  
Data Protection Officer  
Folio Education Trust c/o Park Hill Junior School  
Stanhope Road  
Surrey CR0 5NS      Email: [squreshi47@suttonmail.org](mailto:squreshi47@suttonmail.org)      Tel: 0203 011 2767

The data controller responsible for processing your personal data is Folio Education Trust:

Mr Jonathan Wilden  
Executive Head-teacher  
Folio Education Trust c/o Park Hill Junior School  
Stanhope Road  
Surrey CR0 5NS      Email: [jwilden1@suttonmail.org](mailto:jwilden1@suttonmail.org)

## 7 – For how long do you store data about me?

We follow the guidance of the Information & Records Management Society (IRMS) in determining our data retention policies, unless we identify a need to deviate from it. Please contact our Data Protection Officer for further information.

## **8 – What rights do I have regarding my personal data?**

- The right to be informed about how your data is used and why. This is the objective of this notice.
- The right of access to see what data is held about you.
- The right to rectification of incorrect or incomplete data held about you.
- The right to erase data if there is no compelling reason for it to be held.
- The right to restrict processing of your data where there is an unresolved dispute about the data.
- The right to object to your data being processed due to your particular situation, if there is no compelling legitimate reason for your data to be processed.
- Rights in relation to automated decision making and profiling.

## **9 – How do I exercise my rights or make a complaint?**

Please contact our Data Protection Officer if you wish to exercise your rights or wish to make a complaint about data-handling. You may also approach the Information Commissioner's Office ([ico.org.uk](http://ico.org.uk)) with your concern.