



Privacy Notice – (How we use pupil information)

You have a legal right to be informed about how our school uses any personal information that we hold about you. To comply with this, we provide a 'privacy notice' to you where we are processing your personal data.

This privacy notice explains how we collect, store and use personal data about you.

We, Springfield School are the 'data controller' for the purposes of data protection law.

Our data protection officer is Nathan Waites, c/o The De Curci Trust (see 'Contact us' below).

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)
- 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, physical and mental health, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (such as end of key stage test results, post 16 courses enrolled for and any relevant results, and general progress data)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- travel information (such as passport numbers, EHIC details, emergency contact details)
- Photographs
- CCTV images captured in school

We collect and use this information/pupil data to:

- support pupil learning
- monitor and report on pupil progress
- provide appropriate pastoral care
- protect pupil welfare and carry out safeguarding activities
- assess the quality of our services
- to keep children safe (food allergies, or emergency contact details)
- to meet the statutory duties placed upon us for DfE data collections
- carry out research
- administer admissions waiting lists

The lawful basis on which we use this information:

We collect and use pupil information under Article 6(1)(c) which provides a lawful basis for processing where 'processing is necessary for compliance with a legal obligation to which the controller is subject.'; Article 6(1)(e) which gives a lawful basis for processing where: 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller'.

We also collect and use pupil data under Article 9 of EU GDPR for data collection purposes which is required under the Education Act 1996, such as the child's racial or ethnic origin, and religious beliefs. Information can be found in the census guide documents on the following website: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>] and under Article 9(2)(g) – the processing is necessary for reasons of substantial public interest.

Less commonly, we may also process pupils' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use pupils' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using pupils' personal data overlap, and there may be several grounds which justify our use of this data.

Collecting pupil information:

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it is 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. We collect pupil information via registration forms at the commencement of a pupil's time at School, via a Common Transfer File (CTF) or other secure transfer from their previous, and through annual and ad hoc updates as necessary.

Storing pupil data:

We hold pupil securely, both electronically and in paper records, and retain data in accordance with the guidance in '[Information and Records Management Society's toolkit for schools](http://irms.org.uk/?page=schoolstoolkit&terms=%22toolkit+and+schools%22)'.

<http://irms.org.uk/?page=schoolstoolkit&terms=%22toolkit+and+schools%22>

We routinely share pupil information with:

- Schools / Educational establishments that the pupils attend after leaving us
- Portsmouth City Council
- The Department for Education (DfE)
- Youth support services (pupils aged 13+)
- The De Curci Trust
- Health Authorities
- The Department for Education
- The pupil's family and representatives
- Educators and examining bodies
- Our regulator - Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for, including not exhaustively; Schoolcomms; Civica
- Our auditors
- Survey and research organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

- Professional bodies
- University Hospital Southampton NHS Foundation Trust

We do not share information about our pupils with anyone without consent unless the law and / or 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 the (DfE) under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

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>

Once our pupils reach the age of 13, we also pass pupil information to our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- youth support services
- careers advisers

The information shared is limited to the child's name, address and date of birth. However where a parent or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the child / pupil once they reach the age 16.

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 to be given access to your child's educational record, please write to The Data Protection Officer, The De Curci Trust, c/o Springfield School in the first instance.

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 about the way we are collecting or using your personal data, we request that you raise your concern with the school in the first instance or, you can also contact 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:

Nathan Waites, Data Protection Officer
The De Curci Trust,
Central Road, Portsmouth PO6 1QY

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>

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