



Christ Church Primary School Privacy Notice (How we use pupil information) – updated January 2020

Under General Data Protection Regulations (GDPR) we are obliged to inform you of the information we hold on your child(ren), what we use it for, who we share it with, and for how long we keep it. This privacy notice aims to provide you with this information. If any information linked to it is unclear, please contact the school office, or the school's Data Protection Officer. Contact details for both are available at the end of this privacy notice.

We, Christ Church Primary School, at Christ Church Hill, Hampstead, London, NW3 1JH, are the Data Controller for the purposes of data protection law. As a public body as we have appointed a Data Protection Officer (DPO), Claire Mehegan, at the London Diocesan Board for Schools.

1. The categories of pupil information that we collect, hold and share include but are not limited to:

- Personal information (such as name, unique pupil number and contact details (contact telephone numbers, email addresses, addresses))
- Characteristics (such as ethnicity, religion, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- Assessment information (such as data scores, tracking, and internal and external testing)
- Relevant medical information (such as doctors information, child health, allergies, medication and dietary requirements)
- Special educational needs information (such as EHCP's, statements, applications for support, care or support plans)
- Safeguarding information
- Behavioural information (such as exclusions)
- Photographs (for example, for school newsletters, media and promotional purposes)
- Payment details

We may also hold data about pupils that we have received from other organisations, including other schools, local authorities and the Department for Education (DfE).

2. Why we collect and use this information

We use the pupil information for the following purposes:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral and medical care
- for safeguarding and pupil welfare purposes
- to administer admissions waiting lists
- to provide access to school meals
- to provide access to extracurricular activities
- for research purposes
- to inform you about events and other things happening in the school

- to assess the quality of our services
- to meet the statutory duties placed upon us for DfE data collections
- to comply with the law regarding data sharing.

3. The lawful basis on which we use this information

Our lawful basis for collecting and processing pupil information is defined under Article 6, and the following subparagraphs in the GDPR apply:

- (a) Data subject gives consent for one or more specific purposes.
- (c) Processing is necessary to comply with the legal obligations of the controller.
- (d) Processing is necessary to protect the vital interests of the data subject.
- (e) Processing is necessary for tasks in the public interest or exercise of authority vested in the controller (the provision of education).

Our lawful basis for collecting and processing pupil information is also further defined under Article 9, in that some of the information we process is deemed to be sensitive, or special, information and the following subparagraphs in the GDPR apply:

- (a) The data subject has given explicit consent.
- (b) It is necessary to fulfill the obligations of controller or of data subject.
- (c) It is necessary to protect the vital interests of the data subject.
- (d) Processing is carried out by a foundation or not-for-profit organisation (includes religious, political or philosophical organisations and trade unions).
- (g) Reasons of public interest in the area of public health.
- (i) It is in the public interest.

4. Collecting pupil information

We collect information primarily through registration forms, the Home School book and Common Transfer File (CTF) or secure file transfer from a previous school.

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. 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.

5. Storing pupil data

We hold pupil data securely for as short a time as possible that is consistent with our statutory and legal obligations. We use the Information and Record Management Society's Toolkit for Schools to inform our decisions on retention periods. We ensure that we have adequate protection in place for pupil data, whether this is stored in electronic format or in hard copy. We ensure that our staff have training on their duties in relation to information security.

We have policies and procedures in place, including a data protection policy, which are regularly reviewed. Further information can be found on our website.

6. Who we share pupil information with

We routinely share pupil information with appropriate third parties, including:

- The school(s) that the pupil attends after leaving Christ Church Primary School
- The London Borough of Camden (as our local authority and as a result of contracts in place for services with them)
- Camden Learning, who are contracted by the London Borough of Camden to provide educational and professional support to schools
- The Department for Education
- The pupil's family and representatives
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- The school nurse and the NHS
- Health and social welfare organisations

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

We also have in place contracts with third parties who process data on our behalf. These include:

- Tucasi (payment system)
- London Grid for Learning (IT provider)
- RM Integrus (management information provider)

In each case, our contract with the provider ensures that the data is only used for the purposes for which it was collected by us and that appropriate security measures are in place.

7. 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 (the London Borough of Camden) and the DfE under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

We will also share data with other agencies in line with our duties in relation to safeguarding and child protection with other agencies.

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>.

8. 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 DfE 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 DfE 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 DfE'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 DfE 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 the DfE: <https://www.gov.uk/contact-dfe>.

9. Requesting access to your personal data and your Data Protection Rights

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 Office: admin@cchurchnw3.camden.sch.uk or on 020 7435 1361.

You also have the right to:

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

10. Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our Data Protection Officer, Claire Mehegan, at the London Diocesan Board for Schools: claire.mehegan@london.anglican.org.

Alternatively, you can make a complaint to the Information Commissioner's Office by reporting a concern online at <https://ico.org.uk/concerns> or by calling 0303 123 1113.

11. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact the Head teacher or the School Office in the first instance at admin@cchurchnw3.camden.sch.uk or on 020 7435 1361.