



General Data Protection Regulation Privacy Notice for Pupils and their Families

Under UK data protection law, individuals have a right to be informed about how our school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

We collect and use personal data relating to pupils and their families and may also receive information regarding them from their previous school, Local Authority or Department for Education.

We, Park Hill Infant School, are the 'data controller' for the purposes of UK data protection law. SCC DPO Services are the Data Protection Officer. Their role is to oversee and monitor the role of the school's data protection procedures and to ensure they are compliant with the GDPR.

The Data Protection Officer can be contacted by e-mail on DPO@sccgdprservices.co.uk

Why we collect and use this information to:

- Support your child's learning;
- Monitor and report on progress;
- Provide appropriate pastoral care;
- Assess the quality of our services;
- Comply with the law regarding data sharing.

The Categories of Pupil Information that we collect, hold and share include:

- Personal information (contact details, including name, address, telephone number)
- Unique pupil number
- Copies of birth certificates/ passports (received at time of admission)
- Proof of address (received at time of admission)
- National curriculum assessment results
- Attendance information, such as sessions attended, number of absences and absence reasons
- Personal characteristics, such as ethnicity, language, nationality, country of birth
- Other categories of information include: free Park Hill Infant School meal eligibility, any special educational needs that your child may have, relevant medical information and exclusions/behavioural information
- Photographs and CCTV images captured in school

The lawful basis on which we use this information:

We will not give information about you or your child to anyone without your consent unless the law and our policies allow us to. We collect and use personal data in order to meet legal requirements and legitimate interests set out in the General Data Protection Regulations (GDPR) and UK Law, including those in relation to the following:

- Article 6 and Article 9 of the GDPR
- Education Act 1996
- Section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013

Collecting Pupil Data

Whilst the majority of pupil data 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, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this. Where consent is required, the Park Hill Infant School will provide you with specific and explicit information with regard to the reasons why the data is collected and how the data is used.

Storing, Transferral and Disposal of Pupil Data

Personal data relating to pupils at Park Hill Infant School and their families is stored in line with Park Hill Infant School's GDPR Protection Policy. In accordance with the GDPR, the Park Hill Infant School does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected.

Responsibility for maintaining the pupil record passes to the next school. The last known or final school is responsible for retaining the pupil record. Records not forming part of the pupil record, such as copies of birth certificates/ passport and proof of address, are retained for shorter retention periods.

Data scheduled for permanent deletion or destruction is destroyed securely. Electronic copies are destroyed securely and hard copies are disposed of as confidential waste.

Park Hill Infant School follows a retention schedule, outlined in the Document Retention Policy, obtained from Information and Records Management Society's (IRMS) Toolkit for Schools (2019.) This has been cited by the Department for Education as an example of data retention best practice.

We routinely share pupil information with:

- Schools that the pupils attend after leaving us
- Abacus
- Capita SIMS
- CPOMS
- Croydon Council, our local authority
- Croydon Drop-In service
- Dyslexia Gold – Engaging Eyes Ltd
- JCA School Support
- London Grid for Learning
- Nationwide Retail Systems
- Octavo Partnership - educational psychology service
- OpenAIR Systems Ltd
- Osborne Technologies
- ParentPay
- Park Hill Infant School nursing team
- Public Health England
- Target Tracker
- Teachers2Parents

- Team EWS
- The Department for Education (DfE)
- Wandle Learning Trust

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 Park Hill Infant School's funding and educational policy and monitoring.

We are required to share information about our pupils with the Local Authority (LA) and the Department for Education (DfE) under section 3 of the Education (Information about Individual Pupils) (England) Regulations 2013.

Data Collection Requirements

To find out more about the data collection requirements placed on us by the Department for Education (for example: via the Park Hill Infant School Census) go to: [https://www.gov.uk/education/data-collection-and-censuses-for-Park Hill Infant Schools](https://www.gov.uk/education/data-collection-and-censuses-for-Park-Hill-Infant-Schools)

The National Pupil Database (NPD)

The NPD is owned and managed by the Department for Education and contains information about pupils in Park Hill Infant School 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 Park Hill Infant School, 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 Park Hill Infant School census. Some of this information is then stored in the NPD. The law that underpins 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
- 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 to, (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>

Subject access requests (SARs)

Under data protection legislation, parents and pupils have the right to request access to information we hold about them. A request form is available from the school office. Please return your completed form to Rachel Enwonwu Data Compliance Officer using the contact details found on page 4 of this notice.

You are entitled to submit subject access requests all year round, but please bear in mind that it may be necessary for us to extend the response period when requests are submitted over the summer holidays. This is in accordance with article 12(3) of the GDPR, and will be the case where the request is complex – for example, where we need multiple staff to collect the data.

What are your rights?

You have the right to:

- Make a Subject Access Request
- 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;
- To withdraw your consent at any time, where the processing of data is based on your consent;
- Claim compensation for damages caused by a breach of the Data Protection regulations

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form
- You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact' below).

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office on 03031 233333, Monday to Friday 9am-5pm or at <https://ico.org.uk/concerns/>

Restricted transfers

As a general rule, transfers of data are not made outside of the European Economic Area (EEA). The only exceptions to this would be in the event that not doing so it would endanger a child or go against any safeguarding legislation or statutory guidance our school is bound to adhere to.

Where we are aware that a company, contractor or supplier may store personal data we transfer to them outside of

the EEA, consent would be obtained prior to any data transfer.

Contact

The Data Protection Officer, SCC DPO Services, can be contacted by e-mail on: DPO@sccgdprservices.co.uk

If you would like to discuss anything in this privacy notice, please contact:

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