

Privacy Notice for Four Elms Primary School

This notice explains what personal data (information) we hold about you, how we collect, how we use and may share information about you. We are required to give you this information under data protection law.

Who are we?

Four Elms collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws. Our Data Protection Officer is Schools Personnel Services (SPS).

Email: sps-dpo-services@isystemsintegration.com

Correspondence address: SPS DPO Services, iSystems Integration, Devonshire House, 29-31 Elmfield Road, Bromley, Kent. BR1 1LT

The personal information we collect and use

Information collected by us

In the course of providing education we collect the following personal information when you provide it to us:

Personal data that we may collect, use, store and share (when appropriate) about pupils includes, but is not restricted to:

- Name
- Contact details, contact preferences, date of birth, identification documents
- Parental, sibling and extended family details
- Children who are adopted from care, looked after children, under special guardianship
- Results of internal assessments and externally set tests



FOUR ELMS
PRIMARY SCHOOL

- Pupil and curricular records
- Characteristics, such as ethnic background, language, eligibility for free school meals, Pupil Premium or special educational needs
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs of your child
- Carefully chosen and vetted educational apps (For example Spellodrome)

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

How we use your personal information

We use your personal information to:

- Support pupil learning
- Monitor and report on pupil progress
- Moderate teacher assessment judgements
- Provide appropriate pastoral care and support services
- Assess the quality of our services
- Comply with the law regarding data sharing
- Support you to decide what to do after you leave school
- Support or improve educational provision
- Ensure no children are missing education
- Support children at risk of permanent exclusion
- Support the primary, secondary and in-year admissions process
- Safeguard children and young people
- Improve the education and services we provide

In order to meet statutory requirements around appropriate education provision and to fulfil safeguarding requirements, we share information about school history and the latest known pupil and parent address and contact details in the event of a Child Missing Education, or becoming Electively Home Educated. This information also supports the in-year admissions process.

PTA

Our PTA work hard to raise funds to benefit the children at Four Elms Primary School. We share with them the names of individual children in the form of class lists, which allow them to provide personalised gifts and adequate resources. We email, text and distribute promotional materials on their behalf to publicise events.

How long your personal data will be kept

We will hold your personal information securely and may retain it from the child/young person's date of birth until they reach the age of 25, after which the information is archived or securely destroyed as per regulations.

Reasons we can collect and use your personal information

We collect and use pupil information under section 537A of the Education Act 1996, section 83 of the Children Act 1989, and to carry out tasks in the public interest. If we need to collect special category (sensitive) personal information, we rely upon reasons of substantial public interest (equality of opportunity or treatment).

We only collect and use pupils' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation
- We need it to perform an official task in the 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.

Who we share your personal information with

- Department for Education (DfE) (statutory for school funding and educational attainment policy and monitoring) and other government agencies and local authorities as required (e.g. to resolve funding queries)
- Kent County Council teams working to improve outcomes for children and young people
- Commissioned providers of local authority services (such as education services)
- Schools or colleges that you attend after leaving us
- Local forums with schools and KCC representatives which support in-year fair access processes and support managed moves between schools
- Local multi-agency forums which provide SEND advice, support and guidance (such as Local Inclusion Forum Team (LIFT))
- Partner organisations signed up to the Kent & Medway Information Sharing Agreement, where necessary, which may include Police, school nurses, doctors and mental health workers and Kent Community Health NHS Foundation Trust
- Schools in our local collaboration, to enable the moderation of pupil assessment outcomes, to support collaborative working through joint analysis, and ensure children continue to receive appropriate education provision
- KCC has to share information with external moderators (teachers with recent relevant experience) of end of key stage assessments, to meet statutory requirements from the Standards & Testing Agency (STA)
- Third-party providers of information services (such as educational student apps) where consent has been given
- Contracted providers of services (such as school photographers, electronic communications and catering providers) where consent has been given

We will share personal information with law enforcement or other authorities if required by applicable law.

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

The National Pupil Database (NPD)

The NPD is owned and managed by the DfE 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 DfE. 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.

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.

Your Rights

Under the GDPR you have rights which you can exercise free of charge which allow you to:

- Know what we are doing with your information and why we are doing it
- Ask to see what information we hold about you (Subject Access Requests)
- Ask us to correct any mistakes in the information we hold about you
- Object to direct marketing
- Make a complaint to the Information Commissioners Office
- Withdraw consent (if applicable)

Depending on our reason for using your information you may also be entitled to:

- Ask us to delete information we hold about you
- Have your information transferred electronically to yourself or to another organisation
- Object to decisions being made that significantly affect you
- Object to how we are using your information
- Stop us using your information in certain ways

We will always seek to comply with your request however we may be required to hold or use your information to comply with legal duties. Please note: your request may delay or prevent us delivering a service to you.

For further information about your rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioners Office (ICO) on individuals' rights under the General Data Protection Regulation.

Parents/carers also have a legal right to access to their child's **educational record**. To request access, please contact

If you would like to exercise a right, please contact Katie McCann, Head of School.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Who to Contact and Where to go for Further Information

Please contact Francesca Wade, our office manager, or if you have a complaint about why your information has been collected, how it has been used or how long we have kept it for.

If you would like to get a copy of the information about you that KCC shares with the DfE or post-16 providers or how they use your information, please contact the Information Resilience and Transparency Team at data.protection@kent.gov.uk.

For more information about services for children and young people, please go to: <http://www.kent.gov.uk/education-and-children> or the KCC website at www.kent.gov.uk

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone 03031 231113.

For further information visit <https://www.kent.gov.uk/about-the-council/about-the-website/privacy-statement>

For further information about how the Department for Education uses your information:

To find out more about the pupil information we share with the DfE, for the purpose of data collections, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

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 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>

To the School Office

I confirm I have read and agree to the school's data sharing notice

Child/Children's Name/s

Parent/Carer's Name

Signature

Date

This notice is based on the Department for Education's model privacy notice for the school workforce, amended to reflect the way we use data in this school