

PRIVACY NOTICE (HOW WE USE PUPIL INFORMATION)

1. The categories of pupil information that we process include:

- personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- characteristics (such as language, and free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- special educational needs and disability (including the needs and ranking)
- medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (such as key stage 1 and phonics results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- off-site visits, trips and extra-curriculum activities (such as number and list with the names of the children attending the activity)
- free school meals and universal free school meals (such as eligibility information, number and list of children taking the meals)
- Pupil Premium children (such as eligibility information, number and name of the cohort); 'looked after children' (LAC) have a dedicated privacy notice.
- pictures; we use pictures to identify a child in our database, to publish on wide public access media platforms (e.g. our website, newspapers, Twitter) and to resource curriculum delivery in the classroom and wider areas within the school This list is not exhaustive, to access the current list of categories of information we process and the data flow, we are finalising the preparation of our asset register and will publish the link after completion.

2. Why we collect and use pupil information

We collect and use pupil information, for the following purposes:

- a) to support pupil learning
- b) to monitor and report on pupil attainment progress
- c) to provide appropriate pastoral care
- d) to assess the quality of our services and improve them
- e) to meet the statutory duties placed upon us for DfE data collections
- f) carry out research
- g) comply with the law regarding data sharing
- h) administer admissions waiting lists and apply the admission criteria as set in our admissions policy
- i) to keep children safe (food allergies, or emergency contact details)

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing pupil information are:

- for the purposes as set in 2. a) through to h) in accordance with the following legal bases:
 - o 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;
 - o processing is necessary for compliance with a legal obligation to which the controller is subject;
- for the purposes as set in 2. i) in accordance with the following legal basis:
 - o processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- for the purposes of pupils attending school trips, off-site visits, extra-curriculum activities, photos (e.g. our website, newspapers/media in general, Twitter) and other events that fall out of the scope of the statutory areas listed as follow:
 - Admissions
 - Assessment
 - Behaviour and attendance
 - Curriculum
 - Early years foundation stage
 - Involving parents and pupils
 - Looked-after children
 - Safeguarding children and young people
 - Special educational / health needs

in accordance with the following legal basis:

- o the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- for the purposes of promoting the catholic faith, of supporting fundraising activities and of collecting voluntary contributions and donations, in accordance with the following legal basis:
 - o processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child

In addition, concerning any special category data:

- conditions:
 - o race;
 - o ethnic origin;
 - o religion;
 - o health.

The processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards, for the fundamental rights and the interests of the data subject;

3. How we collect pupil information

We collect pupil information via the enrolment pack consisting of the following forms:

- Supplementary Admission
- Medical
- Ethnic
- Email and other communications used in school
- Photo consent
- Voluntary contribution

In addition to the above forms, we also collect pupil information via Common Transfer Files (CTFs) through the secure file transfer portal provided by DfE, namely for in-year applications coming to us from another schools.

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it 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.

4. How we store pupil data

We hold pupil data securely for the set amount of time shown in our data retention schedule.

5. Who we share pupil information with

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- the Diocese through their catholic education services (CES) (<http://www.catholiceducation.org.uk/ces-census>)
- staff1
- school nurse whilst performing the nurse's duties as an NHS employee
- Ofsted
- social welfare organisations
- police and legal bodies (i.e. court and tribunals)
- professional advisers and consultants2
- governors3

6. Why we regularly 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.

7. Department for Education

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our pupils with the Department for Education (DfE) either directly or via our local authority for the purpose of those data collections, under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

All data is transferred securely and held by DfE under a combination of software and hardware controls, which meet the current government security policy framework.

For more information, please see 'How Government uses your data' section.

8. 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 be given access to your child's educational record, contact the school's data protection officer. These are data subject access requests (DSARs).

Parents/carers can make a DSAR with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

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 or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

DPO Emma Maddocks

Lead Auditor Children's Families, Health and Well Being Directorates

Via Sacred Heart Catholic School

Floatshall Road

Manchester M23 1HP

9. Contact

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

Mrs J Bramhall

Sacred Heart Catholic School

Floatshall Road

Manchester M23 1HP

10. 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)

11. 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>

12. 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>

13. 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>

1 The school staff have access to the data according to the permission rights as determined by their job description and by the need-to-know premise in order to perform their duties

2 This is largely based in anonymous data just considering its statistical value, only

3 The data shared with the board of governors is statistical in nature, but where the need arises, information is released in a need-to-know basis. A code of conduct for governors exists to preserve the confidentiality and security of a disclosure