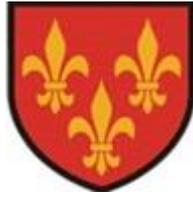


# Hillborough Infant and Nursery School



## Privacy Notice

### (How we use pupil information)

Hillborough Infant and Nursery School is the data controller of the personal information provided to us relating to pupils and their families. This notice explains what we collect, why and how we process the data collected.

#### **The categories of pupil information that we collect, hold and share include:**

- Personal information (such as name, unique pupil number and address);
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility);
- Attendance information (such as sessions attended, number of absences and absence reasons);
- Assessment and attainment information, including special educational needs information, if relevant;
- Safeguarding information, where necessary;
- Medical information, where necessary;
- Exclusion/behaviour information;
- Contact information such as parental and other contact names and telephone numbers for use in cases of emergency;
- Sibling information;
- History of previous schools and nurseries attended;
- Photographs/videos;
- CCTV.

#### **Why we collect and use this information**

We use the pupil data:

- To support pupil learning;
- To monitor and report on pupil progress;
- To record attendance;
- To provide appropriate pastoral care, including the transition of pupils to and from our school;
- To provide and assess the quality of our services, including Hillborough Care Club;
- To comply with safeguarding obligations;
- To comply with the law regarding data returns and sharing.

## **The lawful basis on which we use this information**

We collect and use pupil information under the lawful basis of public interest and for special category data (such as religion, ethnicity and medical information) because it is necessary for a reason of substantial public interest. We also collect data in order to meet legal requirements relating to the following:

- Article 6 and Article 9 of the GDPR
- Education Act 1996
- Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 201

Further information regarding the data collection requirements that are placed on us by the Education Act 1996 can be found on the following website - <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

Some of the information we collect and use is provided with your consent and that is the lawful basis for us processing it. For example, your permission to process your child's data for school trips and for access to online providers of educational materials. We will make it clear where we are asking for your consent and why, and provide you with the opportunity to refuse to provide us with that information, explaining what the consequence of that will be.

## **Collecting pupil information**

We collect pupil information via the following methods:

- Registration / Admission / Agreement forms (School, Nursery and Hillborough Care Club);
- Common Transfer Files (CTF) or secure file transfer from previous school;
- Admission Transfer Files or secure file transfer from the Local Authority;
- Files transferred from previous establishment attended by pupil;
- Local Authority and/ or the Department for Education.

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 and we will tell you what you need to do if you do not want to share this information with us.

## **Storing pupil data**

Personal data relating to pupils and their families at Hillborough Infant and Nursery School and Hillborough Care Club is stored in line with our Data Protection policy.

We hold pupil data securely for as long as we need to educate and look after your child and for as long as necessary to complete the task for which it was originally collected. We will retain some information, after your child has left our school, for a period determined appropriate for the

different types of data we hold. For example, so we can confirm your child's attendance at our school or to find what happened if you make a complaint.

We will endeavour to securely retain data for the minimum period necessary in accordance with the Department for Education's (DfE) recommendations which consider legal and safeguarding considerations linked to the type of data held.

In exceptional circumstances we may hold your data a longer period than recommended, however we would only do so if we have a good reason and if we are allowed to under the data protection law.

## **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);
- Online education providers;
- Staff;
- NHS, including school nurse.

We may also share some pupil data with other parties that provide a service to our school such as trip providers and with third party software and application providers to help us offer further services and resources.

The majority of data is processed in our Management Information System (MIS) and certain data held on our MIS is regularly shared with third party software and application providers for the following reasons:

- Provision of educational resources such as Class Dojo, Purple Mash etc.;
- Provision of operational services such as ParentPlus (trips management, online order and payment system and booking and payment system for Hillborough Care Club);
- Communication software and applications to notify parents/guardians of events and important notices (ParentMail);
- Assessment software/applications to help us record attainment and track progress;

We actively ensure that all third party organisations we share data with, comply with Data Protection Act through their Privacy Notices and Data Sharing Agreements.

## 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.

Data is shared to ensure that pupils receive the most appropriate educational and pastoral support for their needs. To find out more about the data collection requirements go to <https://www.gov.uk/education/data-collection-and-cenuses-for-schools>.

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.

## Local Authorities

We may be required to share information about our pupils with the Local Authority to ensure that they can conduct their statutory duties under the [Schools Admission Code](#), including conducting Fair Access Panels.

## 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.

Depending on the lawful basis above, you may 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

To make a request for your personal information, or be given access to your child's educational record, or to request any rights associated with your or your child's data, please contact our School Business and Resources Manager, Ms Nileema Rahman, on [admin@hillboroughinfantschool.uk](mailto:admin@hillboroughinfantschool.uk)

If you have a concern 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/>

For further information on how to request access to personal information held centrally by DfE, please see the 'How Government uses your data' section of this notice.

## 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>

## **How to find out what personal information DfE hold about you**

Under the terms of the Data Protection Act 2018, you are entitled to ask the Department:

- If they are processing your personal data
- For a description of the data they hold about you
- The reasons they're holding it and any recipient it may be disclosed to
- For a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

## **Last updated**

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated in April 2023.

## **Contact**

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

Ms Nileema Rahman, Business and Resources Manager on 01582 725764 or [admin@hillboroughinfantschool.uk](mailto:admin@hillboroughinfantschool.uk)

The School's Data Protection Officer is Zoe Bulmer, Business Intelligence Manager as Luton Borough Council, who can be contacted on 01582 547703.