

# Copnor Primary School Privacy Notice (How we use pupil information)

Under data protection law, individuals have a right to be informed about how Copnor Primary School uses any personal data that we hold about them. This Privacy Notice explains how we collect this information, how we store and process the information and informs you about the decisions you can make concerning any personal data we hold relating to pupils and their families. Copnor Primary School are the “data controller” for the purposes of data protection law.

## What is personal information?

Information that identifies you as an individual and relates to you is personal information. This can include but is not limited to contact details, photos, financial information and CCTV recordings.

## Why do we collect and use pupil information?

We use the pupil data:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to provide a service for parents and children
- to assess the quality of our services and how well our school is doing
- to comply with the law regarding data sharing
- to safeguard children
- to verify parental responsibility
- to support teaching and learning
- to meet statutory duties placed upon us for DfE data collections
- to carry out research
- to communicate with parents

## The lawful basis on which we use this information

Personal information will only be collected and used with your consent or where it is needed by the school or the local authority to comply with a legal obligation. For example, the Education Act 1999, which requires the collection of pupil data for school census purposes. Copnor Primary School also process personal information under the following:

### We collect personal data on the following legal basis (Article 6, GDPR):

- **Article 6(1)(a)** Consent of the data subject.
- **Article 6(1)(b)** Necessary for the performance of a contract with the data subject or to take steps to enter into a contract.
- **Article 6(1)(c)** Necessary for compliance with a legal obligation.
- **Article 6(1)(d)** Necessary to protect the vital interests (life) of a data subject or another person.
- **Article 6 (1)(e)** Necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

### We collect Special Category Data on the following legal basis (Article 9, GDPR):

- **Article 9(2)(a)** the data subject has given explicit consent to the processing of those personal data
- **Article 9(2)(b)** Necessary to meet obligations under employment, social security or social protection law, or a collective agreement.
- **Article 9(2)(c)** processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;

- **Article 9(2)(e)** processing relates to personal data which are manifestly made public by the data subject;
- **Article 9(2)(f)** For the establishment, exercise or defence of legal claims or court judicial capacity.
- **Article 9(2)(g)** processing is necessary for reasons of substantial public interest
- **Article 9(2)(j)** processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

*The Children's Act 1989 and 2004*

*Education Act 1996, 2002 and 2011*

*Education and Skills Act 2008*

*Equality Act 2010*

*Schools Standards and Framework 1998*

*Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.*

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

- Personal information (such as name, unique pupil number, address, photographs)
- Characteristics (such as ethnicity, language, free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Exclusions information (such as start date, number of days, category, reason and correspondence to parents)
- Assessment information (in year and end of key stage assessment scores/grades for each subject)
- Special Educational Need information (such as provision, needs, placements, payments, medical information, care information)
- Medical information (such as medical need, GP contact data, specialist contact details, dietary requirements)
- School history (such as previous school name, dates attended)
- Contact information (Address, Telephone number, email address)
- Parent/Carer information (such as name, address, contact details)
- Emergency contact information (such as name, address, contact details)
- Birth Certificate (verification of parental responsibility under GDPR)
- CCTV (images processed for safeguarding purposes)

**Collecting pupil information**

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.

**Storing pupil data**

In accordance with GDPR, the school does not store personal data indefinitely; we hold pupil data for as long as is necessary and in order to complete the task for which it was originally collected and in keeping with our retention schedule. The Information and Records Management Society's (IRMS) Toolkit for Schools sets out how long we keep information about students.

## Who do we share pupil information with?

We routinely share pupil information with:

- Schools that the pupil's attend after leaving us
- Our local authority
- Other local authorities if they have responsibility for a child such as SEN/LAC
- the Department for Education (DfE)
- Daily attendance will be shared with the Portsmouth Local Authority's commissioned service called 'Welfare Call Ltd' for all Portsmouth Looked After Children attending this school.
- The School Nursing Team
- NHS (Occupational Therapist, SALT, Physiotherapy)
- Health Professionals (CAMHS, Children's Therapy Service, MABS, Educational Psychologist)
- Pupil and family support services (MASH, Young Carers, EMAS)
- Ofsted
- Police Force, courts
- Professional bodies

We also share personal information for administrative/research purposes with third parties:

- Teachers2parents (providing text/email communication service using WONDE data extractor)
- Rocket (IT support and safety)
- Vis-IT Ed (our visitor/pupil/staff entry system)
- Tucasi (financial management of payments for school dinners/Breakfast & After School Clubs/visits/pupil sales)
- Study Bugs (attendance information reporting to Local Authority)
- Caterlink (online catering company)
- SCOMIS (support the school's information management system)
- ESS (formerly Capita)
- Cool Milk (supply Reception children with milk only with parental consent)
- Yellow Photographers (to process the photographing of pupils)
- Bikeability (Year 5/6 study funded by Department for Transport with parental consent)

Online/additional services to support your child's learning:

- Tapestry (Reception children only with parental consent)
- Times Table Rockstars
- Portsmouth in the Community
- Librosoft Library Management (Harrap Computer Systems Ltd)
- Pompey Pirates (consent required)
- Google Forms
- Google Classroom

**Librosoft Library Management** is used within school to enable children to issue and return library books through scanning barcodes on school books. The school will provide Librosoft with the minimal amount of personal data needed to operate this system (pupil's surname, forename, registration group, year group). This data will be provided once consent has been received by the person with parental responsibility, and parents may opt out of this agreement at any time by contacting the school office.

Pupil's personal details may be edited or deleted by the School Librarian, and Harrap Computer Systems Ltd will permanently delete all leavers upon request from the school. Harrap are registered with the ICO. For further information please click on the following link <http://librosoft.co.uk/privacy/>

**Primary Science Quality Mark (PSQM)** Copnor Primary School was taking part in a research and evaluation project looking at the impact of Primary Science Quality Mark (PSQM) in 2019/2020 and 2020/2021 academic years, involving children currently in Year 3 and Year 4 in the academic year 2018/2019. This research was cancelled due to the COVID-19 pandemic.

**CPOMS** CPOMS is an online evidence based safeguarding programme developed specifically for schools for improving processes for managing child protection, safeguarding, inclusion, SEN, student welfare and other situations where security and data protection is paramount.

**Google Forms:** Google forms is an online facility initially introduced during COVID-19 to address the need for social distancing and the reduction in paper communication with parents. It provides parents/carers with the option to still be able to opt in to services we offer the children and to provide consent and additional information required through the use of a link sent via Teachers2Parents, thus further eliminating the need to complete and return paper forms.

**Google Classrooms:** The school is using Google Classrooms in response to 'The Coronavirus Act 2020 Provision of Remote Education (England) Temporary Continuity Direction' which "makes it clear that schools have a legal duty to provide remote education for state-funded, school-age children unable to attend school due to coronavirus (COVID-19)." The direction was issued by the Secretary of State for Education on 30th September 2020 to come in to force on 22nd October 2020 and the Education (Coronavirus, Remote Education Information) (England) (Amendment) Regulations 2021 which comes into force on 12th February 2021.

**Times Table Rockstars:** Times Table Rockstars is an online learning tool for Year 2 – Year 6 pupils to encourage children to practise their times tables at home. This is a fantastic online way for the children to develop knowledge of times tables and division facts. Times tables are recognised as essential to access many mathematical concepts and knowledge will be assessed at the end of Y4 by a national test.

## **Why we share pupil information**

Copnor Primary School will 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 (LA) and the Department for Education (DfE) under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

Under the public duties of the Portsmouth Local Authority for improving education standards in Portsmouth, relevant personal information (name and address) will be passed to the Library Service to enable them to issue all Reception year pupils with their own library card.

Under the public duties of the Portsmouth Local Authority for moderating teacher assessments in Portsmouth, relevant personal information (UPN, name, subject and result) will be passed to our moderators from Southampton City Council in order for them to carry out their contracted duties on behalf of Portsmouth Local Authority.

## **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)**

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 pupil information we share with the department, 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>.

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: 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 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, (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>

### **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 Mrs A Newsham, Office Manager, Copnor Primary School.

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
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way Copnor Primary School 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/>

**Contact:**

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

- Mrs A Newsham, Office Manager, Copnor Primary School

If you need more information about how our local authority and/or DfE collect and use your information, please see the [Portsmouth City Council Data Protection Privacy Notice](#)

Or visit:

- the DfE website at <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>