



## **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.

### **The categories of pupil information that we process include:**

- Personal identifiers and contacts (such as name, unique pupil number, photographs, contact details and address)
- Parent/Carer information (such as name, address, contact details)
- Emergency contact details of family and friends
- Characteristics (such as ethnicity, language, and free school meal eligibility)
- Safeguarding information (such as court orders and professional involvement)
- Special educational needs (such as provision, including the needs and ranking, placements, medical information, care information)
- Medical and administration (such as medical need, doctor’s 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 in year and end of key stage assessment, key stage 1 and phonics results)
- Behavioural information (such as exclusions and any relevant alternative provision put in place)
- Birth certificate/passport (Verification of parental responsibility under GDPR/proof of child identity)
- Images of pupils engaged in school activities
- CCTV (images captured on cameras located around the school site. Signs clearly display CCTV cameras are operating.)

### **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
- e) to keep children safe (food allergies, or emergency contact details)
- f) to meet the statutory duties placed upon us for the Department for Education (DfE) data collections
- g) to comply with the law regarding data sharing
- h) to safeguard children
- i) to provide catering services
- j) to administer admission procedures
- k) to record any payments you make to us
- l) to support teaching and learning
- m) to carry out research
- n) to promote the school

o) to communicate with parents

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Our requirement for this data and our legal basis for processing this data includes the Education Act 1996, 2002 and 2011, The Children's Act 1989 and 2004, Education and Skills Act 2008, Schools Standards and Framework Act 1998 and the Equalities Act 2010, the Education (Information about Individual Pupils)(England)Regulations 2013.

Under the [UK General Data Protection Regulation \(UK GDPR\)](#), The lawful bases we rely on for processing pupil information are:

**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

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**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 of 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

**For the Department for Education (DfE) data collections see relevant legislation for each specific [data collection](#)**

### **Collecting pupil information**

We collect pupil information via registration forms at the start of the school year or Common Transfer File (CTF) or secure file transfer from previous schools, our Local Authority, the Department for Education, online and hard copy forms, Arbor app.

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

### **Storing pupil data**

We hold pupil data securely, both electronically and in paper records, for the set amount of time shown in our data retention schedule in accordance with guidance in the 'Information and Records Management Society.'

## Who we share pupil information with

### We routinely share pupil information with:

- Staff within the school/Governors/PFA
- Schools that the pupils attend after leaving us (examples include, maintained schools, Multi Academy Trusts (MATs))
- Our local authority (Portsmouth City Council)
- Other local authorities if they have responsibility for a child as SEN/LAC
- The Department for Education (DfE)
- Daily attendance will be shared with the Portsmouth Local Authority's commissioned service called 'Welfare Call' for all Portsmouth Looked After Children attending this school.
- Studybugs to enable the management of school and pupil absence information.
- Fischer Family Trust's systems to support schools with a wider range of tools including pupil attainment and progress, performance tracking and attendance monitoring.
- Pixl (Partners in Excellence assessment reporting)
- The UK Health and Security Agency (e.g. control of contagious diseases)
- NHS & Primary Care Trusts including the school health/nursing team/Occupational Therapist, SALT, Physiotherapy
- Social Services
- Health Professionals (CAMHS, Children's Therapy Service, MABS, Educational Psychologist, MSHT, NDT)
- Pupil and family support services (MASH, Young Carers, EMAS)
- Ofsted
- Police Force, Courts
- Professional bodies
- Portsmouth City Council legal services
- Educators and examining bodies (eg. Reception Baseline Assessment)

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

- Rocket (IT support and safety)
- Tucasi Ltd (financial management of payments for school dinners/Breakfast & After School Clubs/visits/pupil sales etc.)
- ScoPay (parent facing app to pay for school meals/trips etc.)
- Teachers2Parents (providing text/email communication service)
- Sign In App (visitor/pupil/staff entry system)
- Arbor and Arbor App (hosted support for the school's information management system, MIS)
- Caterlink (online catering company)
- Edenred (UK Group) Ltd for the provision of meal vouchers
- Cool Milk (supply Reception children with milk only and with parental consent online)
- Yellow Photography Limited (to process the photographing of pupils)
- Images/videos of pupils in school publications, on the school website and on social media sites
- Evolve (online risk assessment for education visits)
- WONDE (data extraction software from MIS to provide up to date information for DfE, Teachers2Parents, FFT Aspire Data Exchange, Times Table Rockstars, Smartgrade, Sign In)
- CPOMS (Child Protection Online Monitoring and Safeguarding System)
- Groupcall Limited (data extraction software from MIS to provide up to date information for CPOMS)
- Microsoft Teams/Microsoft Forms

- Google Forms (pre-Microsoft)
- Residential organisations/educational visit providers who require additional information for risk assessments (online/spreadsheets)
- Librosoft Library Management

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

- Tapestry (Reception children only with parental consent – an online journal recording children's learning with parental input)
- Times Table Rockstars (sequenced programme of daily times table practice)
- Pompey Pirates (extra-curricular learning for selected Year 5 pupils)
- ELS (Essential Letters and Sounds)
- Phonics Tracker
- Bikeability (Department for Transport national award provider for cycle training - Year 5)
- Mountbatten Centre (Year 5 swimming lessons)
- Online social media: Instagram/Facebook (with parental consent)

### **Curriculum Support – no data provided**

- Pompey in the Community (Portsmouth Football Club sports coaching)
- myHappyMind (supporting pupils' mental health with NHS backed programmes)
- White Rose (Maths)
- Spelling Shed (Spelling/phonics)

### **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. We share pupils' information 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.

### **Department for Education (DfE)**

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, for example, we share daily school attendance under the following legislation: The School Attendance (Pupil Registration) (England) Regulations 2014, and school census: section 3 of The Education (Information About Individual Pupils) Regulations 2013.

All data is transferred securely and held by the Department for Education (DfE) under a combination of software and hardware controls, which meet the current [government security policy framework](#).

### **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 office on [admin@copnorprimary.co.uk](mailto:admin@copnorprimary.co.uk)

You also have the right:

- to ask us for access to information about you that we hold

- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.

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/>

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

### **Withdrawal of consent and the right to lodge a complaint**

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the school office.

### **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 December 2024.

### **Contact**

If you would like to discuss anything in this privacy notice, please contact: Copnor Primary School, Copnor Road, Portsmouth, PO3 5BZ. Tel: 023 92661191. Email [admin@copnorprimary.co.uk](mailto:admin@copnorprimary.co.uk)

### **How Government uses your data**

The pupil data that we lawfully share with the Department for Education (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 (DfE) (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 (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 Department for Education (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.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-npd-privacy-notice/national-pupil-database-npd-privacy-notice>

### **Sharing by the Department for Education (DfE)**

The law allows the Department for Education (DfE) to share pupils' personal data with certain third parties, including:

- schools and 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 for Education's (DfE) 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 the Department for Education (DfE) to request access to individual level information relevant to detecting that crime.

For information about which organisations the Department for Education (DfE) 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 the Department for Education (DfE) holds about you**

Under the terms of the [Data Protection Act 2018](#), you are entitled to ask the Department for Education (DfE):

- 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 for Education (DfE), you should make a 'subject access request'. Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at the address below:

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

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe> .

Approved by the Full Governing Body:

Date reviewed: 04/02/2025