



## Privacy Notice (How we use pupil information)

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

- Personal identifiers  
E.g. name, date of birth, unique pupil number
- Contact Details  
E.g. Home address, email address and telephone numbers, alternative contact details
- Characteristics  
E.g. ethnicity, language, nationality, country of birth and free school meal eligibility
- Safeguarding information  
E.g. Details of disclosures, outcomes of meetings, court orders and associated artefacts, documentation relating to professional involvement
- Medical  
E.g. Accident logs, Doctors information, child health, dental health, allergies, medication and dietary requirements)
- Attendance  
E.g. Sessions attended, number of absences and reasons, previous schools attended)
- Assessment and attainment  
E.g. Attainment and progress records across curriculum subjects
- Behavioural information  
E.g. Types of behaviour displayed, outcomes of incidents, exclusions and any relevant alternative provision put in place)
- Special educational needs  
E.g. SEN Personal Files and details of interventions
- Photographs  
E.g. Pictures taken to promote the school, include on Tapestry or Marvellous ME
- Administration  
E.g. Dinner money administration, school trip & residential visits, school uniform

### 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 DfE data collections

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

- Article 6(1)a: Consent confirmation has been obtained
- Article 6(1)c Processing is necessary for compliance with a legal obligation
- Article 6(1)d Processing Necessary to protect the vital interests of the data subject

There are Special Categories of Information that needs protection due to its sensitivity – this information is likely to include:

- Sexuality and sexual health
- Religious or philosophical beliefs
- Ethnicity
- Physical or mental health
- Trade union membership
- Political opinion
- Genetic / Biometric Data

We process these classes of information based on:

- Article 9(2)a: Explicit consent of the data subject (unless precluded by EU Law)d
- Article 9(2)c Processing Necessary to protect the vital interests of the data subject
- Article 9(2)h Processing Necessary for purposes of preventative or occupational medicine

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.

## Collecting pupil information

We collect pupil information using Pupil information forms (registration at the start of the school year, forms for trips and visits, other administrative purposes), via encrypted files (e.g. Common Transfer File), parental communication (e.g. text and email)

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.

## Storing pupil data

We hold pupil data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please visit <http://www.millfields.essex.sch.uk/>

Who we share pupil information with

We routinely share pupil information with:

- Essex County Council / Local Education Authority (our local authority)
- Youth support services (pupils aged 13+)
- Department for Education (DfE)
- Health authorities
- Statutory assessment services
- Pupils family and representatives

## 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' 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.

## 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 **Darrin Keeble via email: [dpo@millfields.essex.sch.uk](mailto:dpo@millfields.essex.sch.uk)**

You also have the right to:

- 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 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 **Darrin Keeble via email: [dpo@millfields.essex.sch.uk](mailto:dpo@millfields.essex.sch.uk)**

## 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 on **28<sup>th</sup> June 2019**

## Contact

If you would like to discuss anything in this privacy notice, please contact: **Darrin Keeble via email: [dpo@millfields.essex.sch.uk](mailto:dpo@millfields.essex.sch.uk) our Data Protection Officer**

## 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 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'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>

To contact DfE: <https://www.gov.uk/contact-dfe>