Seer Green CE School
Pupil Privacy Notice

"I praise you because you made me in an amazing and wonderful way"
(Psalm 139 v14, ICB)

This notice was reviewed in: June 2026

It is to be reviewed by: June 2027

Introduction

We collect and use personal information about pupils so that we can operate effectively as a school.

This privacy notice explains how we collect, store and use (i.e. process) pupils' information, as well as what rights pupils have in relation to our processing of their information.

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

School Lead:	Laura Morel, Headteacher
Data Protection Officer:	Nicola Cook, SchoolsDPO Ltd nicola@schoolsdpo.com 01296 658502

1) The categories of pupil information we process includes:

- **Personal identifiers and contacts**, e.g. name, unique pupil number, contact details and address, identification documents, photographs
- **Characteristics**, e.g. ethnicity, language, pupil premium and free school meal eligibility
- **Attendance information**, e.g. sessions attended, number of absences and reasons, any previous schools attended
- **Assessment and attainment**, e.g. key stage 1 and phonics results
- **Medical and administration**, e.g. child health, dental health, allergies, medication and dietary requirements, doctor's information
- **Special educational needs**, including details of the needs and ranking
- **Behavioural information**, e.g. behavioural incidents, exclusions and any alternative provision put in place
- **Safeguarding information**, e.g. court orders, professional involvement
- **Additional educational activity information**, e.g. involvement in school trips, after school clubs, sporting events.

2) Why we collect and use pupil information

The personal information we collect and use is essential for us to operate effectively as a school and meet our legal obligations.

We collect and use pupils' personal information for the following purposes:

a) Support pupil learning
b) Monitor and report on pupil attainment and progress
c) Provide appropriate pastoral care
d) Protect the welfare of pupils and others in our school
e) Meet our legal obligations
f) Administer school admissions
g) Run our school safely and effectively
h) Assess the quality of our services.

3) Collecting pupil information

We collect information about pupils before they join our school and keep this updated as necessary.

Most of the personal information we process is provided directly by parents when their child joins us. The majority of information provided by parents is mandatory, but some may be provided on a voluntary basis. Whenever we collect pupil information from parents, we will make it clear whether providing it is mandatory or optional.

We may also receive information via secure transfer from another school or setting, or from external professionals supporting a pupil (e.g. educational psychologists, speech therapy etc).

4) Storing pupil information

A significant amount of personal information is stored electronically, e.g. in our management information database and curriculum network. Some information may also be stored in hard copy format in lockable cabinets.

We hold pupil information in line with our retention schedule which is available here.

5) Who we share pupil information with

We routinely share pupil information with:

- Schools that pupils attend after leaving us
- Our local authority to support it in meeting its statutory duties, e.g. school admissions

- Department for Education (DfE), e.g statutory data collections (see Appendix One for information on how the DfE uses pupils' information)
- Companies providing services to our school, e.g catering, educational software, photography, communication services

From time to time, we may also share pupil information with third parties, including:

- NHS health professionals, including the school nurse
- Educational psychologists
- Education Welfare Officers
- Therapists
- Prevent teams to meet the Prevent Duty on schools
- Police and law enforcement agencies
- Courts, if ordered to do so
- Research organisations
- Charities and voluntary organisations.

We do not share information about our pupils with anyone without consent, unless the law and our policies allow us to do so.
When we share pupil information with third parties, we will always ensure that we share the minimum amount of information necessary for the purpose of the sharing. We will also require them to keep pupil personal information secure and to treat it in accordance with data protection law.

6) The lawful basis on which we use this information

Our school, as a data controller, needs to comply with the UK's General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018. We are required to ensure we have a lawful basis under the GDPR for any processing we carry out on personal data.

Under Article 6 of the GDPR, the lawful bases we rely on for processing pupil information are:

1. We need to comply with a **legal obligation**, e.g. DfE data returns
2. We need to meet our **public task** of running our school and keeping everyone safe
3. We have a **legitimate interest**
4. We have obtained **consent** to use personal information in a certain way
5. We need to protect someone's life (**vital interests)** in an emergency.

Our lawful bases under the GDPR for the purposes listed in section 2 above are as follows:

a) Support pupil learning - **public task**
b) Monitor and report on pupil progress and attainment - **legal obligation, public task**
c) Provide appropriate pastoral care - **public task**
d) Protect the welfare of pupils and others in our school - **public task**
e) Meet our legal obligations - **legal obligation**
f) Administer school admissions - **legal obligation**
g) Run our school safely and effectively - **public task**
h) Assess the quality of our services - **legitimate interests**.

Some pupil information requires extra protection because it is considered more sensitive. This includes race, ethnicity, religious beliefs, medical conditions, genetic information and biometric data.

Under Article 9 of the GDPR, if we are processing special category data, we will also rely on one of the following lawful conditions:

- We have **explicit consent**
- To meet our obligations as a data controller, or those of data subjects, in connection with **employment, social security and social protection**
- To meet our **public interest** task of keeping pupils safe and ensuring **equality of opportunity/treatment**
- To establish, exercise or defend **legal claims**
- To protect someone's life (**vital interests**) in an emergency.

In addition, under the UK's Data Protection Act 2018, we rely on the processing conditions at Schedule 1 part 1, paragraphs 8 and 18. These relate to the processing of special category data for safeguarding and equality of opportunity/treatment. Our Appropriate Policy Document provides more information about this processing and can be accessed here.

7) The lawful basis of consent

Whenever we rely on consent as our lawful basis, it must be freely given, informed and clear. It can also be withdrawn at any time by contacting the school lead (details on the first page).

8) Pupils' Data Protection Rights

Under the GDPR pupils have the right to request access to the information about them that we process (a **subject access request)**.

Where a child does not have the maturity to understand their own data rights, a parent can make a subject access request on their behalf. It is generally considered that around the age of 12 a child is mature enough to understand and request access to their information.

Therefore, in our primary school, parents are able to make an access request on behalf of their child; although we will always consider this on a case by case basis.

To make a request for your child's information, please contact the school lead (details on first page).

Pupils (or parents on their behalf, as above) also have the right to:

- Have their personal data corrected if it is inaccurate or incomplete
- Request the deletion or removal of personal data where there is no compelling reason for its continued processing
- Restrict the processing of their personal data (i.e. permitting its storage but no further processing)
- 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 upon them.

For more information on how we handle subject access requests, please see our Data Protection Policy which can be accessed here.

9) How you can help us

As a school, we have limited staff resources outside of term time. It is really helpful if parents can submit any requests for access to their child's information during term time and not too close to the end of term. This will support us in responding as quickly as possible to any requests, which we always want to do.

10) Any concerns

We take any concerns about our collection and use of personal information very seriously, so please contact us (details on first page) to raise any concerns in the first instance.

If you remain concerned, having done this, you have the right to raise your concerns with the Information Commissioner's Office and you can find more information about how to do this here.

11) Appendix One - 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:
regulation 5 of The Education (Information About Individual Pupils) (England) 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.
For more information, please see 'How Government uses your data' section. For privacy information on the data the Department for Education collects and uses, please see:
https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3
and
https://www.gov.uk/government/publications/privacy-information-key-stage-4-and-5-and-adult-education

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)

The NPD is owned and managed by the Department for Education (DfE) and contains information about pupils in schools in England. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.
The data in the NPD is provided as part of the operation of the education system and is used for research and statistical purposes to improve, and promote, the education and well-being of children in England.

The evidence and data provide DfE, education providers, Parliament and the wider public with a clear picture of how the education and children's services sectors are working in order to better target, and evaluate, policy interventions to help ensure all children are kept safe from harm and receive the best possible education.
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)

DfE will only share pupils' personal data where it is lawful, secure and ethical to do so. Where these conditions are met, 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