



Marlow CE Infant School Privacy Statement March 2024

We, Marlow C of E Infant School, are a data controller for the purposes of the General Data Protection Regulation. We collect and hold personal information from you about your child and may receive information about your child from their previous school or nursery, the Local Authority, the Department of Education (DfE) and the Learning Records Service.

The Data Protection Officer (DPO) for the school is:

Data Protection officer	Email	Phone
turnITon	dpo@turniton.co.uk	01865 597620 (option 3 - GDPR)

The representative of the data controller on a day-to-day basis is the Headteacher, Mrs Sharon Reynolds

The categories of pupil information that we process include:

- personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- characteristics (such as ethnicity, language, and free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- special educational needs (including the needs and ranking)
- medical and administration (such as doctors 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 key stage 1 and phonics results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- trip and club participants
- identification and management of information relating to children who are eligible for pupil premium grants
- Admissions information including the holding of copies of birth certificates for pupils on roll at the school. This is for the purpose of authentication of identity.

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.e states that the use of personal data is justified if 'processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller'. In this instance, the requirement for the school to deliver education under the Education Act (1996) requires us to collect information to deliver this service.
- Article 9 covers the use of sensitive personal information (this includes health and social care information). This is justified either by article 9.2.a (consent from the data subject) or article 9.2.e (processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services).

How we collect pupil information

We obtain pupil information via registration forms at the start of each academic year. In addition, when a child joins us from another school we are sent a secure file containing relevant information.

As the child moves through the school we collect information through observation, formative and summative assessments, conversations with parents/carers and outside professionals, requests from and surveys of parents/carers as well as online learning both in school and at home.

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.

How we store pupil data

We keep personal information about pupils while they are attending our school. Data is stored in a range of ways both electronically and in hard copy format. Electronically data may be stored using cloud-based and on-premise servers (the latter are backed up remotely on a regular basis). We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. [Information and Records Management Society's Toolkit for schools](#) sets out how long we keep information about pupils

Who we share pupil information with

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our local authority – to meet our legal obligation to share certain information with it, such as safeguarding concerns and exclusions
- the Department for Education (DfE)
- the pupil's family and representatives
- our regulator – OFSTED
- suppliers and service providers
 - to enable them to provide the service we have contracted them for eg Learning Ladders
 - the system that we use to input assessment data
- financial organisations,
- central and local government,
- school auditors,

- professional advisors and consultants,
- health & welfare organisations including the NHS and health professionals,
- police forces,
- courts, tribunals,
- professional bodies
- school governors
- other parties where there is a legal basis for doing so

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.

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:

- For the school census
 - Section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.
Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the Department and provides evidence on school performance to inform research.
- For Assessment and Reporting arrangements
 - Section 40(2)(a) of the Childcare Act 2006 (Learning and Development Requirements) Order 2007 (S.I. 2007/1772)
The Early Years Foundation Stage Profile at the end of a child's Reception year at this school. This information details each pupil's achievement in each the development areas outlined in the [statutory framework for the early years foundation stage](#)
 - Section 87 of the Education Act 2002. Article 9 of The Education (National Curriculum) (Key Stage 1 Assessment Arrangements) (England) Order 20042
Information regarding pupils achievements in the Phonics Screening test in Year 1 and 2 and the end of Key Stage 1 statutory assessments.

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.

Requesting access to your personal data

Under data protection legislation, individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them. Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data.

This includes:

- Confirmation that their personal data is being processed
- Access to a copy of the data
- The purposes of the data processing
- The categories of personal data concerned
- Who the data has been, or will be, shared with
- How long the data will be stored for, or if this isn't possible, the criteria used to determine this period
- The source of the data, if not the individual

- Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual

Subject access requests must be submitted in writing, either by letter or email to the DPO. They should include:

- Name of individual
- Correspondence address
- Contact number and email address
- Details of the information requested

To make a request for your personal information, or be given access to your child's educational record, contact the Headteacher, Mrs Sharon Reynolds.

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
- a right to seek redress, either through the ICO, or through the courts

If you have a concern or complaint about the way we are collecting or using your or your children's 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 the school.

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>

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

Policy update information

This policy is reviewed annually and updated in line with data protection legislation.

Policy approved:	February 2024
Policy review:	February 2025