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# Privacy Notice - Pupil

## Brockwell Junior School

### Version 1.0

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<b>Last Reviewed</b>	26.11.2020
<b>Reviewed By</b>	Julie Murcott
<b>Next Review Date</b>	Nov 2021

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# Privacy Notice (How we use pupil information) – For pupils and their families

## 2.1 What this Privacy Notice is for

Brockwell Junior School collect, hold, use and share information about our pupils and their families. This is known as “personal data” and you have rights around that data, including knowing how and why we are processing the data. “Processing” data means from collecting, storing, using, sharing and disposing of it.

## 2.2 The types of information that we process

- personal information that identifies you, and your contact details. This includes name, date of birth, unique pupil number, photographs, contact details and address
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- assessment and attainment (such as National curriculum assessment results e.g. Key Stage 2 results)
- Extra-curricular and enrichment participation
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## 2.3 Special category data

- 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 information (such as Doctor’s information, child health, dental health, allergies, medication and dietary requirements)
- Funding (Free school meal, Pupil Premium, ESA, High Needs Funding and Catch Up Funding)

## 2.4 Why we collect and use pupil information

We collect and use pupil information, for the following purposes:

- to support pupil learning
- to monitor and report on pupil attainment progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to keep children safe

- to meet the statutory duties placed upon us for DfE
- to comply with the law regarding data sharing
- for site security
- protect public monies against fraud
- to streamline systems

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

- Article 6(a) - Consent (for any processing which does not fall into the bases detail within this section below)
- Article 6(c) - Compliance and Legal Obligation

as set out in the Education Act 1996 (as amended). We are required to share information about our pupils with the (DfE) under regulation 3 of The Education (Information About Individual Pupils) (England) Regulations 2013. **In addition, there are extensive statutory obligations that a school is subject to – further details about these are available from our Data Protection Officer.**

- Article 6(e) - Public Interest

In addition, concerning any special category (personal data that needs more protection because it is sensitive, please see our legal conditions for processing document for information about special category data) data of [GDPR - Article 9](#) :

- Article 9(2g) - Processing is necessary for reasons of substantial public interest

Data Protection Act 2018 part 2 schedule 1;

- 8 - Equality of Opportunity or Treatment
- 18 - Safeguarding Children and Individuals at Risk

## 2.5 How we collect pupil information

We collect pupil information via admission forms completed by parent/carer when a student joins our School, data collection forms, information provided by; parent/carer, the previous school/provisions, local authorities, NHS, Police, the Department for Education (DfE) and by secure file transfer Common Transfer File (CTF).

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. We will let you know, when we ask you for data, whether you are required to provide the information and your rights in relation to this.

## 2.6 How and where we store pupil information

We securely store workforce information on the School's IT network hosted by RM Integrus which is cloud based. This is run by E Safety4Schools and is securely protected by passwords. This is backed up daily. Secure storage is provided for paper based records. We hold data securely for the set amount of time shown in our data retention schedule. For more information please visit our school website.

*We are currently following the instructions of the Independent Inquiry into Child Sexual Abuse (IICSA) which states that student records should not be destroyed until this inquiry is complete.*

## 2.7 Who we share pupil information with

We routinely share pupil information with:

- Schools that the pupils attend after leaving us
- Feeder schools
- Our local authority
- Other relevant local authorities
- Our Governing Body
- The Department for Education (DfE) Inc. Learner Record Services and the National Pupil Database
- Police
- NHS (agencies and services)/School Nurse
- External systems used by the School to carry out day to day processes and requirements. For example, and not limited to; SIMS, Teachers to Parents, Parent Pay.

**Please see Annex 1 for full list**

## 2.8 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.

### 2.8.1 N/A

### 2.8.2 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 use by maintained schools only:] section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

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.

### 2.8.3 Local Authorities

We may be required to share information about our pupils with the local authority to ensure that they can conduct their statutory duties under

- the [Schools Admission Code](#), including conducting Fair Access Panels.

## 2.9 Requesting access to your personal data, and other rights

Under data protection law, pupils have the right to request access to information about them that we hold, and in some cases, parents can make the request on the pupil's behalf. Parents also have the right to access their child's educational record.

You also have the right to:

- be informed about the collection and use of your personal data.

- rectification, ie to have inaccurate personal data rectified, or completed if it is incomplete.
- erasure, often known as the 'right to be forgotten'; however this does not apply where, amongst other things, processing is necessary to comply with a legal obligation.
- restrict processing, although, as above this is a limited right.
- data portability where applicable.
- object; though other than for marketing purposes, this is also limited as above.
- Where we rely on your consent to process your data, you have the right to revoke that consent.
- You also have rights in relation to automated decision making and profiling, though these are not currently relevant
- Finally, the right to seek redress, either through the ICO, or through the courts

If you would like to request access to your data, or use any of the other rights listed above, please contact the school office in the first instance.

## 2.10 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)

## 2.11 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>

## 2.12 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>

## 2.13 Sharing by the Department

The law allows the Department to share pupils' personal data with certain external, 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/dfе-external-data-shares>

## 2.14 N/A

## 2.15 Contacts

If you have a concern about the way we are collecting or using your personal data or you would like to discuss anything in this privacy notice, we ask that you raise your concern with us in the first instance.

Please contact the School Office, Headteacher or School Data Protection Officer:

Data Protection Officer Name: GDPR for Schools, Derbyshire County Council

DPO Email: [gdpforschools@derbyshire.gov.uk](mailto:gdpforschools@derbyshire.gov.uk)

DPO Phone: 01629 532888

DPO Address: Room 396, North Block, County Hall, Smedley Street, Matlock, Derbyshire, DE4 3AG

### **For Derbyshire County Council:**

Information Governance Officer  
Children's Services Department, Derbyshire County Council  
Room 361  
County Hall  
Matlock  
Derbyshire  
DE4 3AG  
Email: [cs.dpandfoi@derbyshire.gov.uk](mailto:cs.dpandfoi@derbyshire.gov.uk)  
Telephone: 01629 532011

### **For DfE:**

Public Communications Unit,

Department for Education,  
Sanctuary Buildings,  
Great Smith Street,  
London, SW1P 3BT  
Website: [www.education.gov.uk](http://www.education.gov.uk)  
<https://www.gov.uk/contact-dfe>  
Email: <http://www.education.gov.uk>  
Telephone: 0370 000 2288

If however you are dissatisfied with our response to your concerns you can of course contact the ICO quoting our ICO registration number **Z5964666** and stating that the Data Controller is Brockwell Junior School.

Information Commissioners' Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number  
Fax: 01625 524 510  
Website: <https://ico.org.uk/concerns/>

**ANNEX 1****Brockwell Junior School Pupil Data Map**

<b>Company/Individual with whom data is shared</b>	<b>Information Provided</b>	<b>Purpose</b>	<b>How the data is stored</b>	<b>Length of retention</b>
R M Integris	<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Class</li> <li>• Date of birth</li> <li>• Gender</li> <li>• Unique pupil number</li> <li>• SEND info</li> <li>• Medical Info</li> <li>• Attendance</li> <li>• Parents contact details</li> </ul>	<p>Management system for pupil data.</p> <p>Some of the information on RM Integris is shared with ParentPay, My cocern, LCP, Eduspot, Pearson Education Ltd and EduKey</p>	<p>Electronically and paper records.</p> <p>Access to RM Integris system required user names and passwords. User accounts are reviewed every 6 months. Paper records are held in a locked cabinet.</p> <p>Storage of electronic records meets with all the requirements/risk assessments of Derbyshire County Council Audit Department in respect of security of data.</p>	All paper records are transferred to the child's next school when child leaves BJS
ParentPay	<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Class</li> <li>• Date of birth</li> <li>• Gender</li> <li>• Parents contact details, including telephone numbers</li> </ul>	<p>To enable the use of ParentPay for online lunch money payments and text message service.</p> <p>Information provided from RM Integris</p>	<p>Electronically and paper records.</p> <p>Access to ParentPay system required user names and passwords. User accounts are reviewed regularly. Paper records are held in a locked cabinet.</p> <p>Storage of electronic records by ParentPay meets with all the requirements/risk assessments of Derbyshire County Council Audit Department in respect of security of data</p>	Whilst ever the child is at BJS
Breakfast & After School Club	<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Class</li> <li>• Medical needs</li> <li>• Parents telephone numbers &amp; E-mail addresses</li> </ul>	Registration of pupils attending the clubs Parent terms and conditions	Electronically and paper records.	Whilst ever the child is at BJS
Teacher's 2 Parents hosted by Eduspot	<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Parents contact details</li> <li>• Parent e-mail address</li> </ul>	Provision for text & e-mails service to parents	Electronically Storage of records by Eduspot meets with all the requirements/risk assessments of Derbyshire County Council Audit Department in respect of security of data	Whilst ever the child is at BJS

<p>ITrack hosted by LCP</p>	<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Class</li> <li>• Date of birth</li> <li>• Gender</li> <li>• Unique pupil number</li> <li>• Ethnicity</li> </ul>	<p>To enable the use of data tracking software</p> <p>Information provided from RM Integris</p>	<p>Electronically and paper records.</p> <p>Access to ITrack system required user names and passwords. User accounts are reviewed regularly. Paper records are held in a secure office.</p> <p>Storage of electronic records by LCP meets with all the requirements/risk assessments of Derbyshire County Council Audit Department in respect of security of data.</p>	<p>Whilst ever the child is at BJS, transferred to secondary school then retained until pupil reaches year 9</p>
<p>Active Learn, hosted by Pearson Education</p>	<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Class</li> <li>• Date of birth</li> <li>• Gender</li> </ul>	<p>To enable the children to have access to online maths resource to knowledge &amp; spelling, grammar bug&amp; wordsmith homework</p>	<p>Storage of electronic records by Pearson and meets with all the requirements/risk assessments of Derbyshire County Council Audit Department in respect of security of data</p>	<p>Whilst ever the child is at BJS</p>
<p>G L Assessment</p>	<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Year group</li> <li>• Date of birth</li> <li>• Unique pupil number</li> </ul>	<p>To enable dyslexia screening and group reading tests</p>	<p>Electronic and paper records. Access to GL Assessment requires user names and passwords. User accounts are reviewed regularly. Paper records are held in a secure office.</p>	<p>Retained</p>
<p>Class Dojo</p>	<ul style="list-style-type: none"> <li>• First Name &amp; Initial</li> <li>• Class</li> </ul>	<p>Provision for pupil points system</p>	<p>Electronic Access to Dojo requires unique password</p>	<p>Whilst ever the child is at BJS</p>
<p>Seesaw</p>	<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Class</li> </ul>	<p>Provision for pupils to create a work journal</p>	<p>Electronic Access to Seesaw requires unique QR code (which is kept in school) and passwords.</p>	<p>Whilst ever the child is at BJS</p>
<p>Doodle Maths</p>	<ul style="list-style-type: none"> <li>• First name and Initial</li> <li>• Class</li> </ul>	<p>Provision for pupils to access maths resources</p>	<p>Electronic Access requires unique pupil username &amp; password</p>	<p>Whilst ever the child is at BJS</p>
<p>TT Rockstars hosted by</p>	<ul style="list-style-type: none"> <li>• First name &amp; Initial</li> <li>• Class</li> </ul>	<p>Provision for times tables</p>	<p>Electronic Access requires unique pupil username &amp; password</p>	<p>Whilst ever the child is at BJS</p>
<p>School Health Service</p>	<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Class</li> <li>• Date of birth</li> <li>• Gender</li> <li>• Medical Information</li> <li>• Parents contact details</li> </ul>	<p>To provide pupil details for NHS School Health Service</p>	<p>Paper records. Stored in accordance with NHS guidelines.</p>	<p>Duration of child's education and in accordance with NHS retention guidelines</p>
<p>My Concern</p>	<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Class</li> <li>• Date of birth</li> <li>• Gender</li> <li>• Medical Information</li> <li>• Parents contact details</li> </ul>	<p>Safeguarding resource</p>	<p>Staff username &amp; password protected</p>	<p>Electronic data is transferred to Secondary School</p>

<ul style="list-style-type: none"> <li>• Whitehall Centre</li> <li>• Lea Green</li> </ul>	<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Class</li> <li>• Date of birth, gender</li> <li>• Parents contact details</li> <li>• Medical information</li> <li>• SEND information</li> </ul>	Pupil and parent information in respect of residential visits	Paper records only	For the duration of the visit. Destroyed by shredding unless a significant incident arises
Chesterfield School Sports Partnership	<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Class</li> <li>• Gender</li> </ul>	Provision of sporting events and competitions	Paper records. Stored in accordance with Brookfield Community School guidelines	Duration of event. Destroyed by shredding unless significant incident arises
Jumping Clay	<ul style="list-style-type: none"> <li>• Full Name</li> <li>• D.O.B</li> <li>• Medical Needs</li> </ul>	After School Club	Paper records only	Duration of after school club. Destroyed by shredding
Derbyshire Music Partnership	<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Class</li> </ul>	Provision of music lessons in school	Paper records. Separate consent and agreement entered into between Music Teacher and parent	Separate agreement between Music Teachers and Parents
Wheely Fun Wheels	<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Class</li> </ul>	Provision of Bikeability Scheme	Paper records	Destroyed after provision of scheme
Tempest Photography	<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Class</li> </ul>	Provision of School Photograph	Encrypted Electronic records	Retained for 1 Year
<ul style="list-style-type: none"> <li>• Brookfield School Academy Trust</li> <li>• Outwood Academy</li> <li>• St Mary's High School</li> <li>• Lady Manner's School</li> <li>• Parkside Community School</li> <li>• Henry Fanshawe School</li> <li>• Any other School out of the area</li> </ul>	<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Class</li> <li>• Date of birth</li> <li>• Gender</li> <li>• Ethnicity</li> <li>• Attendance</li> <li>• Parents contact details</li> <li>• Medical information</li> <li>• SEND information</li> <li>• Pupil attainment</li> <li>• Safeguarding information</li> <li>•</li> </ul>	Transfer of information to Secondary School	Electronic records via RM Integris and paper records forward in accordance with the school's policy.	Duration of child's education. Records transferred to secondary school
Parents and Friends Association(PFA)	<ul style="list-style-type: none"> <li>• Full Name</li> <li>• Gender</li> <li>• Class</li> </ul>	Fundraising events for the school	Electronically and paper records.	Duration of fundraising event