

## PRIVACY NOTICE

Holbrook Primary School is the Data Controller for the purposes of the General Data Protection Regulation (GDPR). We collect information from you. The categories of information that we collect, hold and share include:

- Personal information (such as name, unique pupil number, contact details)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Assessment information (national curriculum assessment results, teacher assessments)
- Medical conditions, allergies, dietary requirements and doctor details
- SEND information
- Behavioural information (such as exclusions and alternative provision)
- Safeguarding information (such as court orders, professional involvement, pastoral care)
- Photographs (for identification purposes and as part of online learning journeys – Tapestry)

We may receive information about you and your child from your child's previous school, Children's services, the police and the NHS. We hold this personal data and use it to:

- support pupils' teaching and learning
- monitor and report on their progress
- keep pupils safe
- provide appropriate pastoral care
- assess the quality of our services
- support transition to the next school
- complete statutory census returns
- fulfil our obligations under safeguarding legislation

We collect and use pupil information under lawful basis from article 6:

- **Legal obligation:** the processing is necessary for you to comply with the law (not including contractual obligations).
- **Public task:** the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.



and under lawful basis from article 9:

- Processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

## Consent

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

If we do require your consent, this will be done separately to this privacy notice and will require your signature. If, however, you wish to withdraw your consent you have the right to do so.

## Storing pupil data

We hold pupil data until they move to secondary at the end of Year 6 or move to a different school before this point. If children are home educated we will keep their information until they are 25 years old. Electronic data is kept for 7 years after a child has left us.

We use retention guidelines produced by the Information and Records Management Society to make sure we do not have possession of data for longer than is required.

## Who we share pupil information with and why

This data may only be used or passed on for specific purposes as allowed by law. From time to time the school is required to pass on some of this data to:

- our local authority
- a school that a pupil attends after leaving us
- Department for Education (DfE)
- agencies that are prescribed by law - for example social c, early help, NHS and other agencies the school works with
- We also have to share data with after school club providers and residential settings.

All these are data controllers in respect of the data they receive, and are subject to the same legal constraints in how they deal with the data. 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 (Wiltshire Council) and the Department for Education (DfE) under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013. 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-censusesfor-schools>

If you require more information about how the LA and/or DfE store and use this data please go to the following websites:

<http://www.education.gov.uk/researchandstatistics/datatdatam/b00212337/datause>

*Wiltshire website*

### **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 to be given access to your child's academic record, contact:

School Business Manager  
Holbrook Primary School  
TROWBRIDGE  
Wiltshire  
BA14 0PS  
01225 753708  
[admin@holbrook.wilts.sch.uk](mailto:admin@holbrook.wilts.sch.uk)

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
- claim compensation for damages caused by a breach of the Data Protection regulations

If at any point you think there is a problem in the way we are handling your data we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office (ICO) - 0303 123 1113.



Holbrook Lane, Trowbridge, Wiltshire, BA14 0PS  
Telephone (01225) 753708 Fax 01225 350034  
[www.holbrooktrowbridge.co.uk](http://www.holbrooktrowbridge.co.uk)

## Appendix: 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.

We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013.

To find out more about the NPD, go to

<https://www.gov.uk/government/publications/nationalpupil-database-user-guide-and-supporting-information>

The department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided pupil information, (and for which project), please visit the following website:

<https://www.gov.uk/government/publications/national-pupil-database-requests-received>

To contact DfE:

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



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