

Privacy Notice (How we use pupil information)

How We Use Pupil Information

St Peter and St Paul CE Primary School is the data controller for the personal information we collect, process, hold, and share regarding our pupils. As a maintained Church of England primary school, we are fully committed to protecting the privacy, dignity, and security of your personal data. We manage all information in strict compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and relevant UK education laws.

The Data Controller for this information is the Governing Body of St Peter and St Paul CE Primary School. Our designated Data Protection Officer (DPO) is the School Business Manager.

The Categories of Pupil Information We Collect, Hold, and Share

We process a wide range of personal identifiers and sensitive records to run our school effectively. This includes:

- **Personal identifiers and contact details:** Full name, address, date of birth, unique pupil number (UPN), pupil premium status, and emergency contact details for parents/carers.
 - **Characteristics:** Ethnicity, first language spoken, nationality, country of birth, and eligibility for free school meals (FSM).
 - **Attendance metrics:** Number of sessions attended, number of absences, and the specific reasons provided for those absences.
 - **Academic and assessment data:** Internal teacher assessments, learning progress tracking, and statutory national curriculum assessment results (such as EYFS profiles, Phonics screening, and Key Stage 2 SATs).
 - **Medical and dietary records:** Individual healthcare and medical plans, details of regular medications, and critical dietary or allergy information.
 - **Special Educational Needs (SEN) records:** Individual support plans, learning needs assessments, and reports or correspondence from relevant professional bodies (such as educational psychologists or speech and language therapists).
 - **Behavioural and exclusion information:** Details of exclusions, pastoral support records, and internal incident logs (such as "red light" incidents recorded under the school's Behaviour Policy).
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Why We Collect and Use Pupil Information

We use pupil data to run the school safely, monitor progress, and provide the best possible primary education. Specifically, we collect and use this information to:

- **Support learning:** To monitor how well pupils are doing, tailor teaching to their individual needs, and track academic progress.
- **Keep pupils safe:** To provide appropriate pastoral care, protect pupil welfare, and manage medical emergencies or allergies.

- **Manage school operations:** To administer free school meals, plan educational school trips, and monitor attendance.
 - **Assess our performance:** To review how well the school is performing as a whole and report accurately to our governing body.
 - **Comply with the law:** To meet our statutory duties for national data collections and financial auditing.
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The Lawful Basis on Which We Process This Information

We collect and process pupil information under the legal frameworks defined by the UK GDPR. The primary legal bases we rely on are:

- **UK GDPR Article 6(1)(c) – Legal Obligation:** Processing is necessary for compliance with a legal obligation to which the school is subject. For example, under Section 537A of the Education Act 1996, we are legally required to pass information to the Department for Education (DfE) via the annual School Census.
- **UK GDPR Article 6(1)(e) – Public Task:** 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 school. This covers our core day-to-day work of educating and safeguarding our pupils.

Processing Special Category Data

Some of the data we collect is more sensitive and is classified as "Special Category Data" (such as ethnicity, health/allergy records, or Special Educational Needs). To process this data, we rely on the following conditions under UK GDPR Article 9:

- **Article 9(2)(g) – Substantial Public Interest:** Processing is necessary for reasons of substantial public interest. This applies to our statutory obligations for child safeguarding, ensuring equal opportunities, and supporting pupils with medical needs or disabilities.
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Collecting Pupil Information

While the majority of pupil information you provide to us is mandatory to fulfill our public educational task, some data is provided on a voluntary basis.

To ensure compliance with data protection legislation, we will always clarify at the point of collection whether you are required to provide specific information by law or contract, or if you have a choice. If the information is voluntary, we will make this explicit and outline how you can opt out.

Storing Pupil Information

We hold pupil data securely and do not retain it longer than necessary. In line with the *IRMS Information Management Toolkit for Schools*, a pupil's core educational record is retained by the school for the duration of their time with us.

When a pupil transfers to another primary or secondary school, their full educational file is securely transferred to the receiving institution. Our local digital or paper copies are then securely retained or destroyed in strict accordance with our school's Data Retention Policy.

Who We Share Pupil Information With

We do not share information about our pupils with anyone without consent unless the law or our internal policies allow us to do so. We routinely share pupil information with:

- **Schools or educational settings** that the pupil attends after leaving us.
 - **Our Local Authority (LA):** To meet our statutory duties regarding local school tracking, safeguarding, and funding.
 - **The Department for Education (DfE):** On a statutory basis via the School Census to help fund and plan national educational resources.
 - **The National Health Service (NHS):** For school nursing, childhood immunisation programmes, and dental or vision screenings.
 - **Specialist professional bodies:** Such as educational psychologists, speech therapists, or social care teams where it is necessary to support a child's development or welfare.
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Your Data Protection Rights

Parents, carers, and pupils hold specific statutory rights under UK data protection law. You have the right to request access to the data held (Subject Access Request), request rectification of inaccuracies, object to specific processing, or request data restriction.

Because our pupils are of primary school age, parents or legal guardians typically exercise these data rights on their behalf. You can submit a Subject Access Request by contacting the school office in writing.

Who to Contact & Complaints

If you have any questions, concerns, or wish to exercise your data rights, please contact our designated **Data Protection Officer (DPO)**:

- **DPO Role:** School Business Manager
 - **School Address:** St Peter and St Paul CE Primary School
 - **Contact:** Please contact the School Office directly to be put in touch with the DPO.
- If you remain unsatisfied with how your data is handled, you have the right to lodge a complaint directly with the Information Commissioner's Office (ICO), the UK's supervisory authority for data protection. You can do this by visiting the [ICO Make a Complaint Portal](#) or calling their helpline on **0303 123 1113**.