

Privacy Notice (How we use pupil information)

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 doctor's information, child health, dental health, allergies, medication and dietary requirements)
- attendance including free breakfast club attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (such as phonics results, post 16 courses enrolled for and any relevant results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- trips, visits and extracurricular activities (such as consent, attendance, payments and relevant medical or accessibility information)
- catering, free school meals and meal management (such as meal choices, dietary requirements, allergies, free school meal eligibility and applications, entitlement status, funding information and payment records)
- extended school provision (such as breakfast club, Kids' Club and nursery bookings, attendance, authorised collectors and payments)
- digital systems and identity management (such as usernames, school email accounts, authentication information, device allocations and system access records)
- online learning and technology use
- photographs, video and audio recordings (such as images used for learning, identification, displays, the school website or publicity, where appropriate)

Why we collect and use pupil information

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

- a. to identify and meet pupils' special educational needs, disabilities and accessibility requirements
- b. to manage medical needs, medication, allergies, individual healthcare plans, first aid and emergencies
- c. to safeguard pupils, assess risk, support wellbeing and work with relevant professionals and agencies where necessary
- d. to support pupil learning
- e. to monitor and report on pupil attainment progress
- f. to provide appropriate behaviour and pastoral care
- g. to assess the quality of our services
- h. to provide and manage digital learning systems, user accounts, devices and online safety arrangements
- i. to communicate with pupils, parents and carers

- j. to respond to enquiries, concerns and complaints
- k. to create and use photographs, video or audio recordings for education, identification, displays, the school website or publicity where there is an appropriate lawful basis
- l. to meet the statutory duties placed upon us for the Department for Education (DfE) data collections:
 - to administer admissions, pupil records and school transfers
 - to manage attendance, punctuality and absence
 - to organise school meals, free school meal eligibility, trips, visits, clubs, nursery and wraparound provision
 - to manage payments, funding and the allocation of school resources

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

Lawful bases for each processing purpose

a. SEND, disabilities and accessibility requirements

- **Article 6:** Article 6(1)(c) – legal obligation; and/or Article 6(1)(e) – public task.
- **Special category data:** This may include health and disability information. **Article 9:** Article 9(2)(g) – substantial public interest, with an applicable condition under Schedule 1 of the Data Protection Act 2018.

b. Medical needs, medication, allergies, healthcare plans, first aid and emergencies

- **Article 6:** Article 6(1)(c) – legal obligation; and/or Article 6(1)(e) – public task.
- **Special category data:** This includes health information. **Article 9:** Article 9(2)(g) – substantial public interest and, where applicable, Article 9(2)(h) – health or social care. In a life-threatening emergency, Article 6(1)(d) and Article 9(2)(c) may apply.

c. Safeguarding, risk, wellbeing and multi-agency work

- **Article 6:** Article 6(1)(c) – legal obligation; and/or Article 6(1)(e) – public task.
- **Special category data:** Safeguarding records may contain health, disability, ethnicity, religion or other special category information. **Article 9:** Article 9(2)(g) – substantial public interest, with an applicable safeguarding condition under Schedule 1 of the Data Protection Act 2018.

d. Supporting pupil learning

- **Article 6:** Article 6(1)(e) – public task; and Article 6(1)(c) – legal obligation where a specific statutory duty applies.
- **Special category data:** Where learning support uses health, disability or other special category information, **Article 9:** Article 9(2)(g) – substantial public interest, with an applicable condition under Schedule 1 of the Data Protection Act 2018.

e. Monitoring and reporting attainment and progress

- **Article 6:** Article 6(1)(c) – legal obligation; and/or Article 6(1)(e) – public task.

- **Special category data:** Where attainment or progress information is analysed with ethnicity, health, disability or other special category information, **Article 9:** Article 9(2)(g) – substantial public interest, with an applicable condition under Schedule 1 of the Data Protection Act 2018.

f. Behaviour and pastoral care

- **Article 6:** Article 6(1)(e) – public task; and Article 6(1)(c) – legal obligation where a statutory duty applies.
- **Special category data:** Where records include health, disability, ethnicity, religion or other special category information, **Article 9:** Article 9(2)(g) – substantial public interest, with an applicable condition under Schedule 1 of the Data Protection Act 2018.

g. Assessing and improving the quality of services

- **Article 6:** Article 6(1)(e) – public task.
- **Special category data:** Where special category information is necessary and proportionate for evaluation, **Article 9:** Article 9(2)(g) – substantial public interest, with an applicable condition under Schedule 1 of the Data Protection Act 2018. Aggregated or anonymised information will be used where possible.

h. Digital learning systems, accounts, devices and online safety

- **Article 6:** Article 6(1)(e) – public task; and Article 6(1)(c) – legal obligation where processing is required for safeguarding or legal compliance.
- **Special category data:** Where online-safety or support records contain special category information, **Article 9:** Article 9(2)(g) – substantial public interest, with an applicable condition under Schedule 1 of the Data Protection Act 2018.

i. Communicating with pupils, parents and carers

- **Article 6:** Article 6(1)(e) – public task; and Article 6(1)(c) – legal obligation where the communication fulfils a legal duty.
- **Special category data:** Where communications necessarily include special category information, **Article 9:** Article 9(2)(g) – substantial public interest, with an applicable condition under Schedule 1 of the Data Protection Act 2018.

j. Responding to enquiries, concerns and complaints

- **Article 6:** Article 6(1)(e) – public task; and Article 6(1)(c) – legal obligation where a statutory procedure applies.
- **Special category data:** Where necessary special category information is involved, **Article 9:** Article 9(2)(g) – substantial public interest. Article 9(2)(f) may apply where processing is necessary to establish, exercise or defend legal claims.

k. Photographs, video and audio recordings

- **Article 6:** Article 6(1)(e) – public task for education, safeguarding, identification or other core school purposes; Article 6(1)(c) where legally required; or Article 6(1)(a) – consent for genuinely optional publicity or promotional use.

- **Special category data:** An image is not automatically special category data. Where biometric data is used to uniquely identify a person, or other special category information is intentionally processed, an appropriate Article 9 condition will also be identified. This may include Article 9(2)(a) – explicit consent, depending on the activity.

l. Statutory Department for Education data collections

- **Article 6:** Article 6(1)(c) – legal obligation.
- **Special category data:** Where a statutory return includes special category information, **Article 9:** Article 9(2)(g) – substantial public interest, with an applicable condition under Schedule 1 of the Data Protection Act 2018.
- For the school census, maintained schools rely on section 3 of the Education (Information About Individual Pupils) (England) Regulations 2013. The legal requirement for each additional statutory collection will be identified separately.

m. Admissions, pupil records and school transfers

- **Article 6:** Article 6(1)(c) – legal obligation; and/or Article 6(1)(e) – public task.
- **Special category data:** Where necessary records contain health, disability, ethnicity, religion or other special category information, **Article 9:** Article 9(2)(g) – substantial public interest, with an applicable condition under Schedule 1 of the Data Protection Act 2018.

n. Attendance, registration, punctuality and absence

- **Article 6:** Article 6(1)(c) – legal obligation; and/or Article 6(1)(e) – public task.
- **Special category data:** Where absence records contain necessary health or other special category information, **Article 9:** Article 9(2)(g) – substantial public interest, with an applicable condition under Schedule 1 of the Data Protection Act 2018.

o. Meals, free school meals, trips, visits, clubs, nursery and wraparound provision

- **Article 6:** Article 6(1)(e) – public task; Article 6(1)(c) – legal obligation where applicable; and Article 6(1)(b) – contract for genuinely contractual paid services where appropriate.
- **Special category data:** Where provision uses health, allergy, disability, religion or dietary information, **Article 9:** Article 9(2)(g) – substantial public interest and, where applicable, Article 9(2)(h) – health or social care.

p. Payments, funding and allocation of school resources

- **Article 6:** Article 6(1)(c) – legal obligation; Article 6(1)(e) – public task; and Article 6(1)(b) – contract for specific optional paid services where appropriate.
- **Special category data:** Where funding or support decisions necessarily involve special category information, **Article 9:** Article 9(2)(g) – substantial public interest, with an applicable condition under Schedule 1 of the Data Protection Act 2018.

Collecting pupil information

We collect pupil information through admission and registration forms, annual pupil information checks, consent and medical forms, information provided by pupils, parents and carers, and records created by school staff and approved service providers. We also receive information securely from

previous schools, local authorities and other relevant professionals or agencies, including through the Common Transfer File (CTF) and other approved secure file-transfer systems. Information may also be generated through attendance, assessment, safeguarding, behaviour, medical, catering, payment, nursery, wraparound-care and digital learning systems used by the school.

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.

Storing pupil data

We hold pupil data securely for the set amount of time shown in our data retention schedule and records management policy. For more information on our data retention schedule and how we keep your data safe, please visit [\[link to website\]](#)

- Data Protection Policy
- Records Management and Retention Policy
- Data Retention Schedule
- Cybersecurity Policy
- Online Safety and Acceptable Use Policies

Who we share pupil information with

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- health professionals and health services, such as the school nursing service, NHS services and healthcare practitioners
- children's social care, safeguarding partners and other agencies involved in protecting or supporting a pupil
- special educational needs and disability services, educational psychologists and other professionals supporting pupils' needs or accessibility arrangements
- emergency services, including the police, where sharing is necessary and lawful
- assessment and moderation bodies
- approved providers of school information, safeguarding, medical, payment, catering, communications and digital learning systems
- providers of school meals, transport, trips, visits, clubs, nursery and wraparound care, where they need the information to deliver the service safely
- auditors, insurers and professional advisers where sharing is necessary for their work
- government departments, public bodies and funding organisations where required by law or for the administration of public funding
- courts, legal representatives, regulators and law-enforcement bodies where disclosure is required or otherwise permitted by law

We only share the minimum pupil information necessary for the relevant purpose. Sharing takes place where we have a lawful basis, appropriate safeguards are in place and the recipient is

authorised to receive the information. The organisations involved will vary according to each pupil's needs and the services used.

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. We share pupil information where it is necessary to provide education and support, protect pupils' health, safety and wellbeing, meet safeguarding and special educational needs duties, manage attendance and admissions, deliver school services, administer public funding, complete statutory data collections, respond to emergencies, and comply with legal, regulatory or professional requirements.

Sharing is carried out under an appropriate lawful basis in the UK General Data Protection Regulation and the Data Protection Act 2018, including legal obligation, public task and, where relevant, vital interests. Where special category information is shared, we also identify an appropriate Article 9 condition and any applicable condition in Schedule 1 of the Data Protection Act 2018. Relevant duties and powers may arise from education, safeguarding, health, equality and children's legislation, including the Education Act 1996, the Education Act 2002, the Children Act 1989, the Children Act 2004, the Children and Families Act 2014 and the Equality Act 2010. Statutory pupil information is shared with the Department for Education in accordance with the legislation governing the relevant data collection, including the Education (Information About Individual Pupils) (England) Regulations 2013 where applicable.

Information is shared using approved secure methods appropriate to the sensitivity of the data. These may include the Common Transfer File, secure local authority or government portals, encrypted email, access-controlled school systems, secure file-transfer services and, where necessary, sealed or tracked paper records. We check that recipients are authorised, share only the minimum information needed and use data-sharing agreements or processor contracts where appropriate. Information is retained and securely disposed of in accordance with our Data Protection Policy, Records Management and Retention Policy, Data Retention Schedule and relevant information-security procedures.

Department for Education (DfE)

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, we share pupil information with the Department for Education under the Education (Information About Individual Pupils) (England) Regulations 2013, as amended, including by the Education (Information About Individual Pupils) (England) (Amendment) Regulations 2024. Where information about children receiving relevant early years provision is included, the Childcare (Provision of Information About Young Children) (England) Regulations 2009 also apply, where applicable. We review the statutory basis specified in the Department for Education's guidance for each data collection we complete.

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>

Requesting access to your personal data

The UK GDPR gives parents and pupils certain rights about how their information is collected and used. To make a request for your personal information, or be given access to your child's educational record, contact **office@burcough-pri.lancs.sch.uk** **FAO Data Protection officer.**

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of your personal information we have about you – this is called 'right of access', this is also known as a subject access request (SAR), data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to complain to the Information Commissioner if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at [raise a concern with ICO](#).

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting [**office@burcough-pri.lancs.sch.uk**](mailto:office@burcough-pri.lancs.sch.uk) **FAO Data Protection officer**.

Last updated

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated on **14th September 2026**.

If you would like to discuss anything in this privacy notice, please contact: [**office@burcough-pri.lancs.sch.uk**](mailto:office@burcough-pri.lancs.sch.uk) **FAO Data Protection officer**.

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>

How to find out what personal information the Department for Education (DfE) holds about you

Under the terms of the UK GDPR, you are entitled to ask the Department for Education (DfE):

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department for Education (DfE), you should make a 'subject access request'. See the guide for details:

<https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

Further information on what personal information the Department for Education (DfE) holds about you published in the privacy notices for early years foundation stage to key stage 3, and key stage 4 and 5 and adult education. These are available below:

<https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3>

<https://www.gov.uk/government/publications/privacy-information-key-stage-4-and-5-and-adult-education>

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>