St. Joseph's Catholic Primary School

General Data Protection Regulation (GDPR) and Privacy Notice

Approved by:	Governing Body	**Date:** July 2021
Last reviewed on:	January 2025	
Next review due by:	January 2028	

The General Data Protection Regulations (GDPR) came into force in May 2018. Compliance means keeping under constant review the data we hold about parents and children, where it is held, why we hold it and whether we still need to retain that data. This document merges GDPR and our Privacy Notice.

Privacy Notice

Why do we collect and use pupil information?

We collect and use pupil information under Article 6 of the GDPR as "processing is necessary for the performance of a contract to which the data subject is party." And, also Article 6 as the school has a legal responsibility under the Education Act 1996 and other legislation to share data for performance analysis purposes and safeguarding children's wellbeing. https://www.gov.uk/education/data-collection-and-censuses-for-schools

We use the pupil data:

- To support pupil learning;
- To monitor and report on pupil progress;
- To provide appropriate pastoral care;
- To assess the quality of our services;
- To comply with the law regarding data sharing.

The categories of pupil information that we collect, hold and share include:

- Personal information (such as name, unique pupil number and address);
- 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;
- Special educational needs information;
- Safeguarding and behaviour reports;
- Relevant medical information and use of the medical room for injuries/illness patterns;
- CCTV images of the external school site held for fifty days before being deleted.

Collecting pupil information

Whilst the majority of pupil information provided to the school by parents is mandatory, some of it is provided to the school 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. Where, from time to time, other data is sought by the school a full disclosure of the purpose and reason will be supplied to comply with the GDPR criteria in Article 6 whereby, "The data subject (parent) has given consent to the processing." (GDPR Article 6).

Storing pupil data
We hold pupil data for seven years after the child reaches the age of majority (their eighteenth birthday).

Who do 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);
- Selected third party software providers.

Why we 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 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 (LA) and the Department for Education (DfE) under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

Data collection requirements
To find out more about the data collection requirements placed on us by the Department for Education 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 DfE 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.

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;
- 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 the DfE: https://www.gov.uk/contact-dfe .

Third Party Software Providers
Data is also shared with selected third party software providers. This enables pupils to access their own learning programmes from multiple providers in and out of school. All providers are checked by the school to ensure they comply with the GDPR and satisfy the criteria of the DfE's guidance for Cloud software.

Our current (January 2025) software partners are:
SIMS – School Information Management System
SIMS stores the essential data we need about your child, name, date of birth, address, emergency contacts, siblings in school. We get this data from you, the parent, and store it so that we can create class lists, birthday lists for class teachers, mark sheets etc. We need the data in case your child has an accident or we need to contact an adult. From Year One your child's educational progress is stored on SIMS and that information is shared with you in the spring open evening. Attendance data and copies of reasons for absence are stored. The data is shared under strict regulation. There is a statutory duty to pass certain data to the local authority and the DfE, e.g. end of key stage assessments and which children are on roll. There is a regulatory duty to share data with social care if a child is considered to be at risk or an assessment of risk needs to take place. We also share data with the packages My Concern, Teachers to Parents and School Money; the reasons are explained in each section below. SIMS also stores contact information and purchasing history for each of our suppliers.

My Concern is an online safeguarding management tool. The basic data of each child (name, dob etc.) is stored by My Concern so as the staff log a concern about a child their name will appear in the correct box and the other basic details will be pre-populated. Staff may log a welfare concern, a low level worry that the staff member just wants to make a note of, a behaviour concern where a child may receive a

sanction such as a blue slip to record the incident or a safeguarding concern where there is a concern for the child's immediate welfare and safety. The information is passed to the Designated Safeguarding Leads, Mr Rakowski, Mr Doak and Miss Sasenarine, and only shared further if it is in the child's interest to do so.

School Money is an on line payments system to support parents by avoiding cash payments.

Teachers 2 Parents is an on-line messaging service to send texts and emails to the first named contact on the SIMS information sheet.

Classroom Monitor is the on line assessment tool used by the school. Results are shared at teacher/ parent conferences.

Class Dojo is a reward system used by some classes. Dojo data is destroyed annually, held securely and used solely for the purpose of rewarding children's achievements.

Meditracker is an online medical incident tracker and reporting tool.

In addition, we may still hold paper records from before the adoption of some of the software listed above.

Medical Room Records/ Accident Records
We enter all incidents onto a locally held database so we can search it by child's name, location of accident, time of day, date etc. This enables us to risk assess and make the environment safer for all and alerts us to children using the medical room excessively.

Deputy Head's Behaviour Log
This recorded serious behaviour before we adopted My Concern in February 2018.

Safeguarding Files
Locked cabinets stored safeguarding information before we adopted My Concern in February 2018.

SEND Files
These are shared with parents when provision maps are updated or at annual reviews.

Medical Files
These hold essential medical information passed to the school by the parent.

Previous School Reports
Each child receives an annual report in the summer, we keep a digital copy in case we need to look back in time to assess a child's needs. If a child has moved school, the previous school's files are stored.

Admissions Information
We retain the information parents provide at the point of seeking admission to the school and the data from the LA regarding the distance from school of parents' residences until the end of the admission round. The data is then destroyed safely

Personnel Information
We hold data about all our employees and volunteers for the purposes of safeguarding, performance management, staff discipline and welfare, and remuneration. The data is held within a LBE sponsored programme, I-Trent, and in individual staff paper files.

Requesting access to your personal data
Under data protection legislation, parents and pupils over the age of twelve have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact the headteacher who will send you a pro forma request form. The school has 28 days in which to respond to your request.

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;
- Claim compensation for damages caused by a breach of the Data Protection regulations.

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: https://ico.org.uk/concerns/ .

Does St. Joseph's Catholic Primary School comply with the GDPR data principles?

- ✓ Processed lawfully, fairly and transparently. Data falls into three main groups, basic data such as name address etc. and attendance. This data is largely provided by the parent and the registers taken every am and pm. It is checked at least annually with the parent. Secondly attainment data, children's progress is always moderated by teams of teachers before being finally recorded and progress is shared with parents at parental consultations. Finally, behaviour, safeguarding and additional needs data, here again no

member of staff acts in isolation judgements are always checked by at least one other member of staff. Records are available so long as disclosure does not place the child at risk.

- ✓ Collected for specific explicit and legitimate purposes. We care about your child, need to keep them safe and need to assess their learning and support their development. That is why records are kept.
- ✓ Adequate, relevant and limited to what is necessary. We review the data we collect regularly and seek only to hold the minimum necessary for the efficient running of the school.
- ✓ Accurate and up to date.
- ✓ Our various policies and procedures e.g. assessment policy, safeguarding policy, behaviour policy ensures data is current and up to date.
- ✓ Kept for no longer than is necessary. The DfE and the LA give advice on how long records should be stored for seven years after a child turns 18. Before any paper is stored in our archive room we record the contents of the data and date so we can destroy it once it goes out of date. Similar procedures for scanned data will need to be developed.
- ✓ Kept securely. Electronic data is subject to our Acceptable Users Policy for IT signed by every member of staff and volunteer. Passwords are strong and protected and regularly changed. The use of USB and other storage devices is restricted. Paper data is in locked filing cabinets with access to only approved staff. Designated Safeguarding Leads may take one safeguarding file off site at a time and its return must be recorded.

Transfers of personal data to third countries or international organisations (GDPR Article 44)

Should a child relocate to a country outside the UK, we will ask the parents specific consent before transferring data electronically or manually. Should the school use computer packages hosted by countries outside the UK, such as Dropbox and others we will seek best practice regarding GDPR compliance before doing so and inform data subjects if their data is involved

Does St. Joseph's have a named Data Protection Officer?

Yes - Judiceum Education is our DPO (72 Cannon Street London EC4N 6AE
T: 020 7336 8403 E: dataservices@judicium.com).

If you would like to discuss anything in this document, please contact the headteacher.