



## Thrunscoe Primary and Nursery Academy

### Privacy notice for parents/carers – use of your child’s personal data

Under UK-General Data Protection Regulations, individuals have a right to be informed about how the academy uses any personal data that we hold about them. We comply with this right by providing ‘privacy notices’ (sometimes called ‘fair processing notices’) to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **pupils at our school**.

We, Thrunscoe Primary and Nursery Academy, are the ‘data controller’ for the purposes of data protection law.

Our data protection officer is Tim Pinto, E-safety Office Ltd.

#### The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about pupils includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Safeguarding information
- Attendance information
- Exclusion information
- Details of any support received, including care packages, plans and support providers
- Information about your child’s use of our information and communications systems, equipment and facilities (e.g. school computers)

We may also collect, use, store and share (when appropriate) information about your child that falls into ‘special categories’ of more sensitive personal data. This includes, but is not restricted to:

- Details of any medical conditions, including physical and mental health
- Photographs
- CCTV images captured in the academy
- Characteristics, such as ethnic background, eligibility for free school meals, or special educational needs

We may also hold data about pupils that we have received from other organisations, including other schools, local authorities and the Department for Education.

#### Why we use this data

We use this data to:

- Support pupil learning
- Monitor and report on pupil progress

- Provide appropriate pastoral care
- Protect pupil welfare
- Assess the quality of our services
- Administer admissions waiting lists
- Carry out research
- Comply with the law regarding data sharing
- Make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely

### **Use of your child's personal data for filtering and monitoring purposes**

While your child is in our school, we may monitor their use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations
- Comply with our policies (e.g. child protection policy, IT acceptable use policy) and our legal obligations
- Keep our network(s) and devices safe from unauthorized access, and prevent malicious software from harming our network(s)
- Protect your child's welfare

### **Our lawful basis for using this data**

Our lawful bases for processing your child's personal data for the purposes listed in section 3 above are as follows:

- We need to comply with a legal obligation – this is usually where data has to be shared by law with the DfE or local authority or another government department
- We need it to perform an official task in the public interest – often public interest can be when we share data with a third party for a reason e.g. safeguarding
- Fulfil a contract we have entered into with you - sharing data around assessment, safeguarding and attendance

Less commonly, we may also process pupils' personal data in situations where:

- We have obtained consent to use it in a certain way – specific consent is sought for images etc.
- We need to protect the individual's vital interests (or someone else's interests) – information may be shared with the emergency services

Where we have obtained consent to use pupils' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using pupils' personal data overlap, and there may be several grounds which justify our use of this data.

### **Our basis for using special category data**

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and 1 of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your child's personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent

- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest
- For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:
  - We have obtained your consent to use it in a specific way
  - We need to protect an individual's vital interests (i.e. protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent
  - The data concerned has already been made manifestly public by you
  - We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
  - We need to process it for reasons of substantial public interest as defined in legislation

### **Collecting this information**

While the majority of information we collect about pupils is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

Most of the data we hold about your child will come from you, but we may also hold data about your child from:

- Local authorities
- Government departments or agencies
- Police forces, courts or tribunals

### **How we store this data**

We keep personal information about pupils while they are attending our academy. We may also keep it beyond their attendance at our academy if this is necessary. Our Records Management Policy sets out how long we keep information about pupils and this is available on the academy's website.

We will dispose of your child's personal data securely when we no longer need it.

### **Data sharing**

We do not share information about pupils with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with UK data protection law) we may share personal information about pupils with:

- Our local authority, North East Lincolnshire Council – to meet our legal obligations to share certain information, such as safeguarding concerns and exclusions
- Government departments or agencies
- The pupil's family and representatives

- Educators and examining bodies
- Our regulator, Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for (e.g. our school lunch provider, filtering and monitoring)
- Financial organisations
- Central and local government
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies

### **National Pupil Database**

We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school census and early year's census.

Some of this information is then stored in the [National Pupil Database](#) (NPD), which is owned and managed by the Department for Education and provides evidence on school performance to inform research.

The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The Department for Education may share information from the NPD with other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

For more information, see the Department's webpage on [how it collects and shares research data](#).

You can also [contact the Department for Education](#) with any further questions about the NPD.

### **Transferring data internationally**

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with UK data protection law.

### **Parents and pupils' rights regarding personal data**

#### **How to access personal information that we hold about your child**

Individuals have a right to make a '**subject access request**' to gain access to personal information that the academy holds about their child.

If you make a subject access request, and if we do hold information about your child, we will (subject to any exemptions that apply):

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with

- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your child's personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us

Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

If you make a subject access request, and if we do hold information about you or your child, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been shared with, or will be shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request please contact the business manager at the academy.

Parents, or those with parental responsibility, do not have an automatic legal right to access to their child's educational record (which includes most information about a pupil). However, our academy will respond to requests from parents/those with parental responsibility.

### **Other rights**

Under UK data protection law, individuals have certain rights regarding how their child's personal data is used and kept safe, including the right to:

- Object to the use of your child's personal data
- Prevent it being used to send direct marketing
- Object to and challenge the use of your child's personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your child's personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact the headteacher.

### **Complaints**

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact the headteacher or our data protection officer:  
Tim Pinto, The E-safety Office Ltd, email: [tpinto@esafetyoffice.co.uk](mailto:tpinto@esafetyoffice.co.uk)

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

### **Contact us**

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact the headteacher.

*This notice is based on the [Department for Education's model privacy notice](#) for pupils, amended for parents and to reflect the way we use data in this academy.*

Appendix A:

Organisations that we share data with:

SYSTEM	SYSTEM PURPOSE	WEBSITE FOR FURTHER INFORMATION	STAFF	PUPIL	GOVERNOR	PARENT/ CARER
Schudio School Website	This is our school website provider. Governor details are published on the school website, notices, the school calendar, policies, safeguarding and other useful information. With consent, images may appear on the school website.	<a href="http://www.thrunscoeacademy.co.uk">www.thrunscoeacademy.co.uk</a>	✓	✓	✓	
Parent Pay/School Money/Teachers 2Parents	This system is used to administer online payments for trips and visits. It is also used to send texts to parents and carers.	<a href="http://www.parentpay.com">www.parentpay.com</a>	✓	✓	✓	✓
O Track	O Track is an assessment education software package supporting entry, analysis and sharing of pupil progress and attainment data through Early Years and Key Stages 1 and 2.	<a href="http://www.otrack.co.uk">www.otrack.co.uk</a>	✓	✓		
CPOMS	CPOMS is a software application for monitoring child protection, safeguarding, pastoral and welfare issues.	<a href="http://www.cpoms.co.uk">www.cpoms.co.uk</a>	✓	✓		✓
Tapestry	Tapestry is an online journal recording all the learning and fun of children's early years education.	<a href="http://www.tapestry.info">www.tapestry.info</a>	✓	✓		✓
Edubase	Edubase is the Department's register of educational establishments across England and Wales. The data held on Edubase feeds into the Department's new website too "Compare a School", as well as feeding and updating Directgov and numerous other external websites. This has Governor details.	<a href="http://www.get-information-schools-service.gov.uk">www.get-information-schools-service.gov.uk</a>	✓		✓	
Evolve	EVOLVE Visits is an online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities. It has pupil and staff information on it.	<a href="http://www.edufocus.co.uk">www.edufocus.co.uk</a>	✓	✓		✓
Lincolnshire County Council	Lincolnshire County Council provide training and support for school governors and holds their details. They also provide Governance support for Governing body meetings.	<a href="https://www.lincolnshire.gov.uk/">https://www.lincolnshire.gov.uk/</a>	✓		✓	
Children's	Photographs showing evidence of children's learning may be	Exercise books Learning	✓	✓		

Exercise books & school displays	included in exercise books and learning journeys. Group photographs may be used and appear in numerous children's books/learning journeys and school displays.	Journeys Display boards				
Inventry	Inventory is a visitor management system in school which keeps a record of staff, pupils and visitors on the premises.	<a href="http://www.inventry.co.uk">www.inventry.co.uk</a>	✓	✓	✓	✓
Numbots	NumBots is an online journal of understanding, recall and fluency in addition and subtraction and has pupil names and classes in it.	<a href="http://www.numbots.com">www.numbots.com</a>	✓	✓		
TT Rockstars	TT Rockstars is an online journal recording daily times table practice and has pupil names and classes in it.	<a href="http://www.ttrockstars.com">www.ttrockstars.com</a>	✓	✓		
Education Shed Ltd	Spelling Shed and Literacy Shed plus are online programmes for spelling, reading and writing for the whole school and has pupil names and classes in it.	<a href="http://www.edshed.com">www.edshed.com</a>	✓	✓		
North East Lincolnshire Council	The Academy shares information with North East Lincolnshire Council to enable the local authority to carry out its statutory functions in areas including but not limited to attendance, inclusion and attainment.	<a href="https://www.nelincs.gov.uk/">https://www.nelincs.gov.uk/</a>		✓		
Synergy	Synergy is the Early Years Provider Portal and this is an online system which records early years admissions and funding.	<a href="https://fis.nelincs.gov.uk/Live/SynergyWeb/">https://fis.nelincs.gov.uk/Live/SynergyWeb/</a>		✓		
S2S – Services to schools	The S2S site is based on the Department for Education website and is used for storing and sharing education information.	<a href="http://www.interactions.signin.education.gov.uk">www.interactions.signin.education.gov.uk</a>		✓		✓
NCA Tools	NCA tools is a secure website designed to support schools and local authorities in the administration of national curriculum assessments.	<a href="http://www.assessment@education.gov.uk">www.assessment@education.gov.uk</a>		✓		
Perspective	Perspective is a secure website designed to support schools and local authorities in the analysis of national curriculum assessments	<a href="http://www.angelsolutions.co.uk">www.angelsolutions.co.uk</a>		✓		
Scholarpack	Scholarpack is a cloud based Management Information system used for all pupils, staff and contacts.	<a href="http://www.scholarpack.com">www.scholarpack.com</a>	✓	✓	✓	✓
PGL	PGL is one of our residential activity centres.	<a href="https://www.pgl.co.uk/">https://www.pgl.co.uk/</a>		✓		✓
Class Dojo	Class Dojo is an online system which connects teachers, students and parents to sharing work and photographs.	<a href="http://www.classdojo.com">www.classdojo.com</a>	✓	✓		✓
Classroom Secrets	Classroom Secrets provides various worksheets and resources.	<a href="https://classroomsecrets.co.uk/">https://classroomsecrets.co.uk/</a>	✓			



Department for Education – School Attendance Data Collection	The Department of Education collects attendance data daily from the Academy.	<a href="https://www.gov.uk/government/organisations/department-for-education">https://www.gov.uk/government/organisations/department-for-education</a>		✓		
Evouchers	System for ordering supermarket vouchers for school holidays.	<a href="https://www.evouchers.com/">https://www.evouchers.com/</a>		✓		✓
Fischer Family Trust (FFT)	FFT is a secure website designed to support schools and local authorities in the analysis of national curriculum assessments.	<a href="http://www.fft.org.uk">www.fft.org.uk</a>		✓		
Fortis	Fortis provide a counselling/therapy service for specific children.	<a href="https://fortistherapy.co.uk/">https://fortistherapy.co.uk/</a>		✓		✓
Imagination Library (Dolly Parton)	Imagination Library provides books to nursery children up to the age of 5.	<a href="https://imaginationlibrary.com/uk/">https://imaginationlibrary.com/uk/</a>		✓		✓
Jigsaw	Jigsaw provides resources for RE and PHSE.	<a href="https://jigsawpshe.online/">https://jigsawpshe.online/</a>	✓	✓		
Magic Booking	System used for booking on to Breakfast and after school club.	<a href="https://www.magicbooking.co.uk/">https://www.magicbooking.co.uk/</a>				
Nessy	Provides resources to support pupils with dyslexia.	<a href="https://www.nessy.com/en-gb">https://www.nessy.com/en-gb</a>	✓	✓		
Price and Buckland	Price and Buckland provide the Year 6 Leaver’s hoodies.	<a href="https://price-buckland.co.uk/">https://price-buckland.co.uk/</a>		✓		
TSS	TSS are our IT support provider.	<a href="https://tssltd.net/">https://tssltd.net/</a>	✓	✓		
Vocabulary Ninja	Vocabulary resources.	<a href="https://vocabularyninja.co.uk/">https://vocabularyninja.co.uk/</a>	✓			
Wonde	Wonde transfers data to third parties directly from the Academy’s MIS system.	<a href="https://www.wonde.com/">https://www.wonde.com/</a>		✓		✓
Wrates	School Photograph provider.	<a href="https://www.wrates.co.uk/">https://www.wrates.co.uk/</a>	✓	✓		