



Under data protection law, individuals have a right to be informed about how the school 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 or parents/other family members.

We, Comberton Primary School, are the 'data controller' for the purposes of data protection law. Our data protection officer is Mrs Yarnold.

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

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

- Name, contact details, contact preferences, date of birth, identification documents, unique reference number.
- Internal assessments and statutory end of key stage assessments (SATs).
- Pupil and curricular records.
- Characteristics, such as ethnic background, language, nationality, eligibility for free school meals
- Special educational needs information.
- Exclusion information.
- Details of any allergies or medical conditions, including physical and mental health.
- Attendance information such as sessions attended, absences, absence reasons.
- Safeguarding information.
- Details of any support received, including care packages, plans and support providers.
- Photographs.

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

The categories of parent/other family member's information that we collect, hold and share:

- Names, contact details (address, telephone number, email), gender, parental responsibility, contact preferences, place of work.

In some specific cases we also hold:

- Date of birth, national insurance number, nationality (ethnicity), relationship to the child.
- Characteristics, such as ethnic background, language, nationality, eligibility for free school meals, benefit entitlements.
- Safeguarding information.

Why we collect and use this information:

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.

The lawful basis on which we use this information:

We only collect and use personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation.
- We need it to perform an official task in the public interest.

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

- We have obtained consent to use it in a certain way.
- We need to protect the individual's vital interests (or someone else's interests).

Where we have obtained consent to use personal data, this consent can be withdrawn at any time. Please contact our data protection officer if you wish to discuss any matters regarding consent.

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

Collecting pupil information:

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

Storing pupil data:

We keep personal information about pupils or parents/carers while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations.

For example:

- In the case of Safeguarding or SEN information, until they are aged 25.
- In the case of attendance data, for 3 years after the child leaves us.
- In the case of admissions, 3 years after date of admission.
- For statutory assessments (SATS), 6 years after the child leaves us.

We use the [Information and Records Management Society's toolkit for schools](#) as guidance for data retention.

Who we share information with:

We do not share information 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 data protection law) we may share personal information about pupils or parents/carers with:

- Schools that the pupil attends after leaving us.
- Our local authority (including SEN services, children's services etc...).
- The Department for Education (DfE).

- School Health Service.
- MLS Library Service, Shire Services, Tempest Photography, Parentmail, Education City etc..... *to enable them to provide the service we have contracted them for*

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 (LA) 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-censuses-for-schools>.

The National Pupil Database (NPD):

We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school census. Some of this information is then stored in the [National Pupil Database](#) (NPD), which is owned and managed by the Department 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.

Parents and pupils' rights regarding personal data:

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them. 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. Parents also have the right to make a subject access request with respect to any personal data the school holds about them.

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, 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 our data protection officer. Parents/carers also have a legal right to access to their child's **educational record**. To request access, please contact **Mrs Yarnold via the school office – 01562 754704 or office@comberton.worcs.sch.uk**.

Other rights:

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

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to 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 processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

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 our data protection officer.

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 our **data protection officer**:

Mrs Yarnold via the school office – 01562 754704 or office@comberton.worcs.sch.uk.