



*Children and adults are at the heart of our school;
our school is at the heart of our community.*

Privacy Notice

How we use personal information relating to our pupils

This Privacy Notice is to let you know how we as an educational setting look after personal information about our pupils. This includes the information you provide us as well as information we hold about our pupils relating to their education. This notice explains the reasons why we hold personal information, how we use this information, who we share it with and how we keep it secure. This notice meets with the requirements of the General Data Protection Regulations (GDPR).

Please refer to the website copy of this Privacy Notice for the latest version as it will be updated from time to time to reflect any changes in our circumstances.

If you have any questions or queries or would like to discuss anything in this Privacy Notice, please contact:

Mrs J Normanton on 01234 741653.

How we collect pupil information

We obtain pupil information for the start of each academic year through our 'new pupil' registration forms. We also collect any changes to pupil information through update forms during the academic year as part of our data administration process to keep the information we hold as up-to-date as possible. We also collect information through secure file transfers which contain relevant information (e.g. name, date of birth, attendance details) about our new pupils from their previous schools.

We collect and hold pupil information that includes:

- Personal information about the pupils that come to our school such as name, unique pupil number and address, date of birth
- Characteristics such as home language, meal arrangements and eligibility, special educational needs
- Information that is categorised as special data such as gender, ethnicity, religion and medical information
- Contact information such as parental and other contact names and telephone numbers for use in cases of emergency
- Safeguarding information such as court orders, professional involvement and contact with non-resident parents
- Medical information such as GP surgery details, allergies, medication and dietary requirements □
Sibling information
- History of previous schools or nurseries attended

In addition to the information we collect from parents/carers, we also record and hold the following information:

- Attendance information such as sessions attended, number of absences and absence reasons
- Assessment information recorded at various assessment capture points during the academic year as well as end of year attainment information such as Early Years Foundation Stage Results, Phonics outcomes, Key Stage 1 and Key Stage 2 results
- Behaviour information and where relevant, lunch time, fixed and permanent exclusions and any relevant alternative provision

Why we collect and use this information

We use the pupil data to:

- support pupil learning
- safeguard pupils in our care
- record attendance
- monitor and report on pupil attainment and progress
- keep children safe whilst in our care
- provide appropriate pastoral care
- assess the quality of our services
- comply with the law regarding data returns and sharing
- provide any additional support
- Remote learning

We use parent/carer contact information to:

- email parent/carers for purpose of notification of school events, share pupil school work and various reports relating to the pupil's life at the school
- telephone parents/carers in cases of emergency or other matters relating to the safety of the child

The lawful basis on which we hold and use this information

We collect and use pupil information under the legal basis of **public interest** as an educational setting/school with the delegated task of educating and safeguarding the children in our care and under a **legal obligation** which necessitates our school making statutory data returns to the Department for Education (DfE) and the our Local Authority [*as described in Article 6, GDPR*].

Our school is obliged to make statutory pupil census returns and hold attendance information under the following legislation:

Education Act 1996 – Section 434 (1),(3), (4) & (6) and Section 458 (4) & (5)

Education (Pupil Registration) (England) (Amendment) Regulations 2013

Department of Education Advice on Attendance (Nov 2016)

The special categories of data have been collected through explicit consent from the data subject in support of the specific purposes for which the data is being used in the education and safeguarding of pupils in our care [*Article 9, GDPR*].

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>.

Whilst the majority of pupil information you provide to us is mandatory (for reasons described above), there may be some information which we ask you for which is not mandatory but provided on a voluntary basis.

In some cases, we will ask you for information on the legal basis of **legitimate interest** where the information is required to support an educational or safeguarding function (e.g. a parent/carer email address or mobile contact number so that we can contact the parent/carer in an emergency or reasons involving the safety of the child).

The data we collect relating to medical health information is necessary to protect the **vital interests** of the child so that we can ensure a child's medical needs are properly addressed and catered for.

As a Parent/carer, you cannot decline a data collection but you have right to decline providing information for self-declared data items by selecting the 'Refused' option e.g. ethnicity.

There are certain personal data items (e.g. photographs) which we collect on the legal basis of legitimate interest. We will ask you for your explicit consent about how these data items can be used if the purpose extends beyond holding the data within our main management information system (e.g. photograph on our school's website). As a parent/carer you can change your decision to grant or withdraw consent at any time.

If at any point in the future, we seek to use any previously collected information for another purpose or use the information in new software, we will ask for your explicit consent to do so.

Who we share pupil information with

We routinely share pupil information with:

- the school that a pupil attends after leaving us
- our local authority
- the Department for Education (DfE)

We also provide certain pupil data with other parties that provide a service for our school:

- External agencies
- Peripatetic music teachers
- External sports providers

The majority of our pupil information is processed in our main Management Information System (MIS). However, our school also purchases third party software to help us provide additional functions and services. Certain data held on our main management information system is also shared with third party software providers for the following reasons:

- Assessment software which uses the main pupil information such as name, class, date of birth and some contextual information to help us record attainment and track progress
- Email/text messaging software which uses the contact names and telephone numbers used to notify parents/carers of certain events and important notices
- Online payments system which uses our pupil names and classes to link to parent users for the purpose of enabling payments for meals etc.
- Library system which uses pupil names and classes
- School caterers to enable them to provide lunches for the children
- Milk provider in order to provide milk for the children in Nursery and Early Years as well as Pupil Premium children
- School fruit provider in order to provide fruit for children in nursery, Early Years and Key Stage 1
- Supply teachers in order for them to teach the associated children
- IT provider to ensure all equipment is protected and up to date

We actively ensure that all of the third party software organisations we share data with comply with the General Data Protection Regulations through their Privacy Notices and Data Sharing Agreements that they share with us.

Why we share pupil information with external parties

We do not share information about our pupils with anyone without consent unless the legal basis for holding and sharing the data allow us to do so.

We share pupil data with the Department for Education (DfE) and the Local Authority on a statutory basis through data collections such as the school census under the following statutes:

Section 573A of the Education Act 1996

Education Act 1996 s29(3)

Education (School Performance Information)(England) Regulations 2007

Regulations 5 & 8 School Information (England) Regulations 2008

Education (Pupil Registration) (England) (Amendment) Regulations 2013

Further information about the data collection requirements placed on our school by the DfE through the school census can be found at <https://www.gov.uk/education/data-collection-and-censuses-for-schools> The data shared with the DfE and the local Authority is **for the purpose of:**

- determining school funding which is calculated based upon the numbers of children and their characteristics in our school
- informing the monitoring of 'short term' education policy such as Pupil Progress measures
- supporting the 'longer term' research and monitoring of educational policy

Most of the pupil data we share with the DfE is held within their **National Pupil Database (NPD)**. *Please refer to the last page of this Privacy Notice for more information about the NPD and their basis for sharing data with third parties.*

How we keep personal data secure

We fully adhere to our Data Protection policies which outline our procedures and processes for accessing, handling and storing data safely in accordance with all the GDPR principles. These policies are regularly reviewed and ratified by our governors. The following processes ensure that we comply with data protection legislation in how we manage the protection of personal data:

- Our networks, file systems and server operating systems are secured through firewalls and spyware/ virus detection programs on our servers to prevent unauthorised access to our data
- Data held in a physical location within the school is held securely and only accessible by staff with appropriate authorisation
- Access to data on systems is through individual passwords which are carefully managed and monitored
- Any data that is removed from the school is minimised and encrypted
- Older data is safely removed from computers and other devices
- Data shared with the DfE and the Local Authority is shared through secure file transfer systems. Any data shared with other legitimate third parties where there is a legal basis for sharing will only be shared through secure methods.
- Data shared with third party software suppliers is controlled by the school. We will only deal with suppliers who can demonstrate that they comply with the requirements of data protection legislation and not use personal data for any other purpose than the purpose for fulfilling the functions we have contracted with them (e.g. assessment).
- We ensure all staff receive regular training on data protection

We also adhere to our **Data Breach Procedures Policy** in the event of a data breach. These procedures explain how our school responds to occurrences of known or reported data breaches. A copy of this policy is available on our school website at www.lakeview.beds.sch.uk
<http://www.lakeview.beds.sch.uk/page/default.asp?title=Home&pid=1>

Requesting access to your personal data

Under data protection regulations, you as the parent/carer and pupils (from age 13), and you have the following rights:

- Right to be informed
- Right to access to your child's or your personal information

- Right to have inaccurate personal data rectified, blocked, erased or destroyed in certain circumstances
- Right to object to processing of personal data that is likely to cause, or is causing, damage or distress
- Right to restrict processing for the purpose of direct marketing
- Right to data portability
- Right to object to decisions being taken by automated means
- Right to claim compensation for damages caused by a breach of the Data Protection regulations

It should be noted that some of these rights will not apply in circumstances where allowing them would significantly reduce or prevent our ability to perform our duties as a school and safeguard the children in our care.

You do have the right to request access to personal information about you and/or your child that we hold. To request access to your personal information or to your child's educational record, you can make a **Subject Access Request (SAR)**. The policy and SAR form are available on the school website.

Our school will follow procedures outlined in our **Subject Access Request Policy** on our website www.lakeview.beds.sch.uk <http://www.lakeview.beds.sch.uk/page/default.asp?title=Home&pid=1> which follows the guidelines promoted by the data protection regulations.

Please note that whilst we aim to respond to requests within the required time period of one month, we may not be able to honour this time period if we receive requests just before or during school holidays. If the nature of the request is complex and/or the request falls within a holiday period, we will aim to reach a mutually agreed alternative time period.

How long we keep personal information

We hold pupil data for the period determined appropriate for the different types of data we hold. We will keep information for the minimum period necessary in accordance with DfE's data retention recommendations which take into account legal and safeguarding considerations linked to the types of data held. Our **Data Retention Schedule** can be found on our website at www.lakeview.beds.sch.uk <http://www.lakeview.beds.sch.uk/page/default.asp?title=Home&pid=1>

All information is held securely and will be destroyed as appropriate under secure and confidential conditions.

Let us know of any changes to personal information and emergency contact information

As a matter of course, we will contact you at least once a year to ensure that all the personal information and emergency contact details we have for your child is accurate and up-to-date. We would encourage you very strongly to ensure that any changes to phone numbers in particular are notified to our school office as soon as possible.

Reporting concerns about our data protection processes

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance by contacting the Head Teacher on 01234 741653. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Keeping you informed through this Privacy Notice

We aim to keep you informed of any changes to our data collections and data protection obligations through this Privacy Notice – the latest copy will be available on our website at www.lakeview.beds.sch.uk
<http://www.lakeview.beds.sch.uk/page/default.asp?title=Home&pid=1>

We incorporate information about the pupil data we hold and how we adhere to the GDPR principles for protecting this data in our e-Safety and ICT lessons so that our children are aware of what we do.

DATA RETENTION SCHEDULE					
Data item group	Short term need (event +1 month)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until pupil is aged 25 or older)	Justification
Cygnets Admissions		X			<p>Admissions files Cygnets admissions data is used from the period of the school receiving it up until the point where children enrol. It is then used for some validation and cross checking of enrolment details. Once enrolled, the child's records in the MIS become the core record. If a place is refused by a parent, the data is securely destroyed.</p>

Data item group	Short term need (event +1 month)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until pupil is aged 25 or older)	Justification
Attainment and Progress			X		<p>Attainment & Progress</p> <p>Formative assessment data is useful as a child is building towards a particular more formal assessment. Once the child leaves the school, it has little value in terms of retention.</p> <p>Summative attainment is the main outcome of what children ‘attain’ in school. It is important that future schools where pupils go on to learn can understand previous attainment. Whilst often that information is ‘passed on’ smoothly as children move phase, it is not always the case, and thus retaining the names alongside the main attainment data for 1 year after the pupil has left the school feels proportionate. We keep a range of exercise books as evidence of progress which may be shared with Ofsted and the Local Authority when requested. We retain this for a year (at the end of the next full academic year) after the pupil has left the school</p> <p>Trend analysis is important, 3 to 5 years is often the ‘trend’ people look at, but longer may be relevant. Whilst this must be fully flexible in reporting small sub groups, and the data would wish to be retained at individual level, some personal data (for example, name) could be removed from the data to reduce sensitivity.</p> <p>After 3 to 5 years, then aggregated summaries that have no risk of identifying individuals are all that are typically needed to be retained.</p>

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Data item group	Short term need (event +1 month)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until pupil is aged 25 or older)	Justification
Attendance		X			<p>Attendance</p> <p>Attendance data resides in some of our 'operational' systems in school, such as cashless catering. In these systems, the data is retained until the associated business processes have been concluded (for example, payment of meals). This is the start of the next academic year once all bills are settled feels proportionate.</p> <p>Attendance is related to individual attainment and so being able to relate attendance to attainment whilst in our care is important. Keeping it in detailed, individual form for one year after the pupil leaves school support conversations about detailed attendance that may be needed to best supports that child.</p> <p>After that period, non-identifiable summary statistics are all that is required to support longer term trend analysis of attendance patterns.</p> <p>Under GDPR data minimisation principle, where 'paper records' capture attendance, this paper record duplicates the electronic version, These are destroyed at the end of each academic year.</p>
Behaviour		X			<p>Behaviour This is relevant for managing children within our</p>

Data item group	Short term need (event +1 month)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until pupil is aged 25 or older)	Justification
Exclusions		X			Exclusion data will be 'passed on' to subsequent settings. That school then has responsibility for retaining the full history of the child. If we are unsure on where the child has gone, then we will ensure the LA already has the exclusion data.
Catering and free school meal management			X (free school meal eligibility information)		Due to the way school funding works, free school meal eligibility is a financial matter. We keep this data for 7 years. This 7-year record is with the pupil, as historic dates can be used for funding.

Data item group	Short term need (event +1 month)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until pupil is aged 25 or older)	Justification
Visits and activities	X (field file) X (educational visitors into school)		X (financial information related to trips)	X (major medical events)	<p>Visits and activities Financial information related to visits should be retained for 7 years for audit purposes. This would include enough child identifiers to be able to confirm contributions.</p> <p>A 'field file' is the information that is taken on a visit by our school. This is destroyed following the visit, once any medicines administered on the visit have been entered into the medical log book. If there is a minor medical incident (for example, a medical incident dealt with by staff in the way it would be dealt with 'within school') on the visit, then adding it into the medical log book would be done.</p> <p>If there is a major incident (for example, a medical incident that needed outside agency) we retain the entire file until time that the youngest child becomes 25 would be appropriate.</p> <p>Permission to go on the visit slips will contain personal data, and destroying them after the visit unless any significant incident arises is appropriate, otherwise refer to the policies above. Schools sometimes share personal data with people providing 'educational visits' into school. The provider is responsible for appropriately deleting the information following the visit.</p>
Data item group	Short term need (event +1 month)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until pupil is aged 25 or older)	Justification

Medical information and administration	X (permission slips)	X (medical conditions and ongoing management)		X medical incidents (potentially)	<p>We keep this information to support any handover works about effective management of medical conditions to a subsequent institution.</p> <p>Permission forms that parents sign should to be retained for the period that medication is given, and for 1 month afterwards if no issue is raised by child/parent.</p> <p>Medical 'incidents' that have a behavioural or safeguarding angle (including the school's duty of care) should refer to the retention periods associated with those policies.</p>
Safeguarding/Child Protection				X	<p>All data on the safeguarding file potentially forms part of an important story that may be needed retrospectively for many years. The elements of a pupil file (name, address) that are needed to identify children will be retained along with those records.</p>
Special educational needs				X	<p>All data on the SEN file potentially forms part of an important story that may be needed retrospectively for many years. The elements of a pupil file (name, address) that are needed to identify children will be retained along with those records.</p>

Data item group	Short term need (event +1 month)	Medium term need (pupil at school +1 year)	Long term need (pupil at school +5 years)	Very long term need (until pupil is aged 25 or older)	Justification
Pupil basic details (including Personal Identifiers) and pupil characteristics		X	X (postcodes) X (names) X (characteristics)		<p>We retain basic details on our MIS system We retain this for a year (at the end of the next full academic year) after the pupil has left the school</p> <p>Images are used in displays, printed publications, on Facebook and the school website. These may be retained for two academic years after your child leaves the school.</p> <p>Keeping names attached to safeguarding files for longer than this may be entirely appropriate – see safeguarding section. Characteristics form an essential part of trend analysis, and so retention is in line with those needs.</p>

The National Pupil Database (NPD)

The NPD is owned and managed by the Department for Education 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.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupildatabase-user-guide-and-supporting-information>.

Sharing data by the DfE

The DfE can legally share information about our pupils from the NPD with third parties who are:

- organisations involved with promoting the education or well-being of children in England :
- researchers or analysts
- schools
- local authorities
- other government departments and agencies
- organisations fighting or identifying crime

For more information about the department's data sharing process, please visit:

<https://www.gov.uk/dataprotection-how-we-collect-and-share-research-data>

How the DfE keeps data secure

All data is transferred securely and held by DfE under a combination of software and hardware controls, which meet [ISO27001 standards](#) and the [government security policy framework](#).

The Department has robust processes in place to ensure the confidentiality of our pupils' 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: and
- 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 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-pupildatabase-requests-received>

To contact DfE: <https://www.gov.uk/contact-dfe>