RHODES AVENUE PRIMARY SCHOOL

Pupil Privacy notice – Summer 2025

What categories of information are processed?

The categories of personal information that we process include the following:

- **Personal identifiers and contacts** – e.g. name, unique pupil number, contact details and address
- **Characteristics** – e.g. ethnicity, language and eligibility for free school meals
- **Safeguarding information** – e.g. court orders and professional involvement
- **Special educational needs and disabilities (SEND) information** – including the needs and ranking
- **Medical and administration** – e.g. doctors' information, general health, dental health, allergies, medication and dietary requirements
- **Attendance** – e.g. sessions attended, number of absences, reasons for absences and any previous schools you have attended
- **Assessment and attainment** – e.g. any relevant test and exam results
- **Behavioural information** – e.g. exclusions and any relevant alternative provision put in place
- **Extended Day**, e.g. extra-curricular club group information

This list is not exhaustive. The current list of categories of information the school processes, can be found in the school's Data Asset Register.

Why do we collect and use your information?

We will only collect your information when we have a good reason to do so in line with the law – this is known as having a lawful basis to use data. Here are the reasons we collect your information:

- To support pupil learning
- To monitor and report on pupil attainment and progress
- To provide appropriate pastoral care
- To assess the quality of our services
- To keep pupils safe
- To meet the statutory duties placed on us for government data collections
- To support/provide extended day provision

Under the UK General Data Protection Regulation (UK GDPR), the lawful basis/bases we rely on for processing pupil information are:
The school collects and uses pupil information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and other relevant legislation. The main lawful basis for processing this information is that it is necessary for the performance of a *public task* (Article 6(1)(e)), as the school is carrying out its official duties to provide education and ensure pupil welfare. In some cases, processing is necessary to comply with a *legal obligation* (Article 6(1)(c)), such as sharing data with local authorities or safeguarding bodies. Where appropriate, processing may also be based on *consent* (Article 6(1)(a)), for example, when using pupil photos for marketing or social media, which will always be requested separately. When processing *special category data* (such as health information, ethnicity, or biometric data), the school relies on Article 9(2)(g) (processing for reasons of substantial public interest) or Article 9(2)(h) (health or social care), supported by provisions in the Data Protection Act 2018, Schedule 1. Relevant laws also include the Education Act 1996, Children Act 1989 and 2004, and statutory safeguarding guidance such as Keeping Children Safe in Education.

How do we collect your information?

We collect your personal information via the following methods:

- Admission forms
- Common Transfer File (CTF) from your previous school
- Pre-school reports
- Child Protection Plans (if applicable)
- Education, Health and Care Plans (if applicable)

Pupil data is essential for the school's operational use. Whilst the majority of information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with data protection legislation, we will inform you at the point of collection whether you are required to provide certain information to us or if you have a choice.

How do we store your information?

We hold your personal information securely for the set amount of time shown in the school's Data Retention Policy, which can be found on the school website.

For more information about how we keep your information safe, please see the school's Data and Cyber-security Breach Prevention and Management Plan, which can be found on the school website.

The school takes the security of pupil information very seriously and has put in place appropriate technical and organisational measures to keep data safe. These measures include secure systems for storing and accessing data, password protection, encryption, and access controls to ensure only

authorised staff can view or use personal information. All staff receive regular training on data protection and confidentiality. The school also carries out regular checks and risk assessments to make sure data is handled safely and in line with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Where external organisations process data on the school's behalf, strict agreements are in place to ensure they meet the same high standards of data security.

Who do we share your information with?

We routinely share your information with:

- The local authority (LA)
- The Department for Education (DfE)
- Schools that you go to after leaving us
- Schools Nursing Service (if applicable)
- NHS (if applicable)
- Haringey SEN (if applicable)

Why do we share your information?

We do not share information about you with anyone without your consent, unless the law and our policies allow us to do so.

The school routinely shares pupil information with trusted public bodies such as the local authority, the Department for Education (DfE), the NHS, and Special Educational Needs and Disabilities (SEND) services. This is done to support pupils' education, monitor progress, arrange health and wellbeing services, provide appropriate support for additional needs, and ensure legal obligations such as safeguarding and attendance tracking are met. The legal bases for this sharing include compliance with legal obligations (Article 6(1)(c)) and the performance of a public task (Article 6(1)(e)) under laws such as the Education Act 1996, Children Act 1989 and 2004, and the SEND Code of Practice. Where special category data (e.g. health or SEND information) is shared, this is done under Article 9(2)(h) or 9(2)(g) of the UK GDPR, supported by the Data Protection Act 2018, Schedule 1. Data is transferred securely through encrypted systems and secure government or local authority portals, in line with national and local data protection standards. Full details on how long data is kept can be found in the school's Data Retention Policy which is available on the school website.

Department for Education (DfE)

The DfE collects personal information from us and our LA through various collections the school is required to undertake legally. We are required to share information about pupils with the DfE either directly or via our LA for the purpose of those data collections, under:

- Section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013

All information we share with the DfE is transferred securely and held by the DfE under a combination of software and hardware controls which meet the current government security policy framework,, which can be found by following this link: https://www.gov.uk/government/publications/security-policy-framework

How does the government use your data?

The pupil data that we lawfully share with the DfE through data collections:

- Underpins school funding, which is calculated based upon numbers of pupils and their characteristics in each school.
- Informs 'short-term' education policy monitoring and school accountability and intervention.
- Supports 'longer-term' research and monitoring of educational policy, e.g. how certain subject choices go on to affect education or earnings beyond school.

To find out more about the data collection requirements placed on us by the DfE, e.g. via the school census, follow this link: https://www.gov.uk/education/data-collection-and-censuses-for-schools

The National Pupil Database (NPD)

Much of the data about pupils in England goes on to be held in the NPD.

The NPD is owned and managed by the DfE and contains information about pupils in schools in England – it provides evidence on educational performance to inform independent research as well as studies commissioned by the DfE.

Information on the NPD is held in an electronic format for statistical purposes and it is securely collected from a range of sources, including schools, LAs and awarding bodies.

You can find out more about the NPD by following this link: https://www.gov.uk/government/publications/national-pupil-database-npd-privacy-notice/national-pupil-database-npd-privacy-notice

Sharing by the DfE

The DfE is legally allowed to share pupils' personal information with certain third parties, including the following:

- Schools
- LAs
- Researchers
- Organisations connected with promoting the education or wellbeing of children in England
- Other government departments and agencies
- Organisations fighting or identifying crime

Organisations fighting or identifying crime, such as the Home Office and the police, may use their legal powers to contact the DfE to request access to individual level information relating to a crime.

For more information about how the DfE collects and shares pupil information, you can look at the information in the following two links:

- https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data
- https://www.gov.uk/government/publications/dfe-external-data-shares

How to find out what personal information the DfE holds about you

Under the Data Protection Act 2018, you are entitled to ask the DfE what personal information it holds about you. You have the right to ask the DfE:

- If it processes your personal data.
- For a description of the data it holds about you.
- The reasons it is holding your data and any recipient it may be disclosed to.
- For a copy of your personal data and any details of its source.

To exercise these rights, you should make a subject access request. Information on how to do this can be found by following this link: https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter

You can also contact the DfE directly using its online contact form by following this link: https://www.gov.uk/contact-dfe.

What are your rights?

You have specific rights to the processing of your data; these are the right to:

- Request access to the information the school holds about you.
- Restrict our processing of your personal data, i.e. permitting its storage but no further processing.
- Object to direct marketing (including profiling) and processing for the purposes of scientific and/or historical research and statistics.
- Have your personal data rectified if it is inaccurate or incomplete.
- Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.
- Request the deletion or removal of personal data where there is no compelling reason for the continued processing.

If you want to request access to the personal information that we hold about you, please contact Joanne Tillson – Data Protection Officer (DPO) on joanne.tillson@rhodesavenue.org.uk.

If you are concerned about the way we are collecting or using your information, please raise your concern with the school's DPO in the first instance. You can also contact the Information Commissioner's Office (ICO) at https://ico.org.uk/concerns. The ICO is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

Updating this privacy notice

We may need to update this privacy notice periodically if we change how we collect and process data. The school will inform you when this privacy notice has changed; however, we also recommend that you revisit this privacy notice periodically.

This privacy notice was last updated in April 2025.

How can you find out more information?

If you would like to discuss anything in this privacy notice, please contact Joanne Tillson – Data Protection Officer (DPO) on joanne.tillson@rhodesavenue.org.uk.

If you require further information about how we and/or the DfE store and use your personal data, please visit our website, https://rhodesavenue.school/, the Gov.UK website, (https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data) or download our Data Protection Policy and Data Retention Policy from the school website.