Greenfield Primary School

Privacy Notice (How we use pupil information)

We, Greenfield Primary School, are the data controller for the purposes of Data Protection Law.

Why do we collect and use pupil information?
We collect and use pupil information under the following Acts of parliament and associated legislation:

The Education Act, amendments and accompanying regulations – For example; Section 537A of the 1996 Act enables the education setting to collect information to perform the Department of Education's termly census.

Section 40(2)(a) of the Childcare Act 2006 - Early Years Foundation Stage and Section 87 of the Education Act 2002 - Key Stage 1 and Key Stage 2, enables primary age education settings to collect information for the assessing and reporting of the national curriculum

There are various versions of the Education Act both proceeding and following the 1996 Act that have influence on what information is required and how it is processed such as: The Education Reform Act 1988, Further and Higher Education Act 1992, Education Act 1994, School Standards and Framework Act 1998, Teaching and Higher Education Act 1998, Education Act 2002, Higher Education Act 2004, Education Act 2005, Education and Inspection Act 2006 and Education Act 2011, The Education (Pupil Information) England Regulations 2005 and associated regulations and statutory instruments.

Where appropriate we also rely on:
- The Children Act and subsequent amendments
- The Common Law Duty of Care
- Health and Safety at Work Act
- Working together to Safeguard Children Guidelines (DfE)
- Equality Act 2010
- The Disability Discrimination Act,
- Special Educational Needs (SEN) Code of Practice
- Safeguarding Vulnerable Groups Act
- Limitation Act 1980

We collect and use pupil information, for the following purposes:
- to support pupil learning
- to monitor and report on pupil attainment progress
- to ensure safeguarding
- to provide appropriate pastoral care
- to assess the quality of our services
- to keep children safe (food allergies, or emergency contact details)
- to meet the statutory duties placed upon us for DfE data collections
- to comply with the law regarding data sharing
- to contact parents and carers
- to allow the set up and use of Microsoft Teams/Zoom meetings

The categories of pupil information that we collect, hold and share include:
- Personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- Characteristics (such as ethnicity, language, gender, religion, date of birth, free school meal eligibility)
- Special educational needs (including the needs and ranking)
- Safeguarding information (such as court orders and professional involvement)
- Medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- Attendance information (such as sessions attended, number of absences and absence reasons, any previous schools attended)
- Assessment and attainment information (such as EYFS, Key Stage or internal academic assessment information)
- Behavioural information (such as exclusions and any relevant alternative provision put in place)

For a further example of the information typically held by schools, please see the Department for Education (DfE) Common Basic Data Set, here:

https://www.gov.uk/government/publications/common-basic-data-set-cbds-database

Collecting pupil information
We collect pupil information via registration forms completed at the start of the school year, Common Transfer Files and secure file transfer from previous schools, School Admissions Module and consent forms.

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us 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 pupil information to us or if you have a choice in this and we will tell you what you need to do if you do not want to share this information with us.

We intend to collect consent to process information for educational activities, first aid and urgent medical treatment and use of photographs; please note, you have a right to withdraw consent at any time and can contact the school to do this.

If you provide us with contact details of others, for example, in case of emergency or when you may not be available please ensure that they are aware their information has been passed to the school.

We will also receive the above types of personal information, where relevant, from the previous school/nursery and may also receive information from the Local Authority (LA) and the DfE.

Storing pupil data
The information we collect, use and store about pupils and their parents/carers is retained on our computer systems and in paper files, either until it is updated/superseded or until the pupil leaves the school where it will be passed on to the receiving school in accordance with the Education (Pupil Information) England Regulations 2005. Records are retained by a Secondary school for the period of 25 years from the Date of birth of the

Child. Further information on how long schools retain information can be seen in the Information Records Management Society Toolkit for schools available at this link: <u>School records retention periods</u>

Who do we share pupil information with?
We routinely share pupil information with:
- Relevant staff within the school
- schools that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- Health Services, including NHS, School Nurse, Visual and Hearing Impairment Teams
- Speech & Language Service
- Autism Outreach
- Learning Support Service
- Education Investigation Service
- Dudley Educational Psychology Service
- Social Care services, including MASH, Early Help
- Dr Emily Williams (Educational Psychology for All)
- Services used by DGfL
- E-Safe Monitoring Service
- Micro Librarian Systems
- Microsoft Online Services – Microsoft Office 365
- ParentMail
- RM Education
- Timestable Rockstars
- Rising Stars (My Assessment and Reporting Kit)
- Class Dojo
- Nessy
- Wonde
- MyConcern
- Renaissance Learning
- SchoolMoney (Eduspot)
- MyMaths
- EVOLVE (EDU Focus)
- Edenred
- Readiwriter/Spellodrome
- Provision Map - Tes
- E-Reception – Media Base Direct
- Oxford Owl

The School uses information about children for whom it provides services, to enable it to carry out specific functions for which it is responsible, below are a list of services used by the school where sharing pupil data is needed.

e-Safe Monitoring Service
The e-Safe monitoring service uses the school ICT environment as a source of behaviour markers to provide early warning of safeguarding risk. The software is installed on all school owned devices that use the school computer network. The school may choose to

install this software on school owned portable devices that can be used both inside and outside of the educational establishment. The software will continue to monitor activity on the device irrespective of location e.g. if the school owned device is used on a home computer network, the device will continue to monitor that device's activity.

Using the markers, the specialist team at e-Safe can identify issues and escalate them appropriately to nominated safeguarding and pastoral care staff within school, for intervention.

For further information, please refer to the e-Safe Education website.

If you are unable to access the website, the postal address is: e-safe Education, Salford Innovation Forum, 51 Frederick Road, Salford, M6 6FP

https://www.esafeglobal.com/lp/lawful-basis-for-monitoring-data-security-and-privacy/

Just2easy
J2E is an online creativity tool designed for education. It provides access to a range of on-line tools and resources for pupils and teachers. Access to the J2E resources is through the school's learning platform provided by RM Education.

For further information, please refer to the Just2easy website.

If you are unable to access the website the postal address is: Just2easy Limited, Digital House, Stourport Road, Kidderminster, DY11 7QH.

https://www.just2easy.com/privacy/#:~:text=Sharing%20data.,will%20never%20sell%20user%20information.

Micro Librarian Systems (Capita Reading Cloud)
MLS provides a self-service library management system promoting reading and information culture, motivating independent readers and learners for life whilst developing ICT skills. MLS Connect provides a tool to quickly update the library information directly from the school administration system in one smooth process, establishing a dynamic read-only link that can update pupil and staff details including photos and email addresses etc instantly.

For further information, please refer to the MLS website.

If you are unable to access the website the postal address is: Micro Librarian Systems, Arden House, Shepley Lane, Hawk Green, Marple, Stockport, Cheshire, SK6 7JW

https://www.capita-readingcloud.co.uk/privacy-notice

Microsoft Online Services – Microsoft Office 365
Microsoft Office 365 is a cloud productivity suite free to establishments in UK education. It provides pupils, teachers, and staff with enterprise-grade communication and productivity services which include email, online document editing and storage space.

For further information, please refer to the Microsoft website:

What Microsoft does with customer data:
http://www.microsoft.com/online/legal/v2/?docid=23&langid=en-GB

If you are unable to access the website the postal address is: Office 365, Microsoft Corporation, Microsoft Way, Redmond, Washington, 98052-6399 USA

For Europe please contact: Microsoft Ireland Operations Limited is our data protection representative for the European Economic Area and Switzerland. The data protection officer of Microsoft Ireland Operations Limited can be reached at the following address: Microsoft Ireland Operations, Ltd. Attn: Data Protection, Carmenhall Road, Sandyford, Dublin 18, Ireland.

https://privacy.microsoft.com/en-gb/privacystatement

ParentMail

ParentMail provides a range of applications to help schools improve communications with parents. This includes receiving information, booking parents evenings, responding to forms/surveys, or making payments for school clubs, etc.

The school uses Parentmail to contact you to advise of school closures etc. To enable us to do this we will share your information with the provider of this service to ensure that you receive vital information about the school in a timely and efficient manner without the responsibility of delivering of these important messages being placed on pupils.

For further information, please refer to the ParentMail website.

If you are unable to access the website the postal address is: ParentMail, Litton House, Saville Road, Peterborough PE3 7PR. Tel: 0844 356 0000 Fax: 0844 356 0001

https://www.parentmail.co.uk/wp-content/uploads/2018/06/Privacy-Policy-v6-Final-050618.pdf

Purple Mash

Purple Mash provides a range of on-line creative tools, curriculum focused applications and resources to support and inspire pupils and teachers throughout the curriculum. They are hosted completely online and are web browser driven. Access to the Purple Mash resources is through the school's learning platform provided by RM Education.

For further information, please refer to the Purple Mash website.

If you are unable to access the website the postal address is: 2Simple Software • Enterprise House, 2 The Crest, Hendon, London NW4 2HN. Tel: +44(0) 20 8203 1781

https://www.purplemash.com/mashcontent/applications/security/privacy_usa/Purple_Mash_USA_Privacy_Policy.pdf

RM Education

Dudley schools receive a number of services delivered through the ICT managed service provided by RM Education plc (RM). These arrangements are overseen on behalf of schools who have signed up to the service by Dudley Grid for Learning (DGfL) - a Division of the Directorate of Children's Services (DCS), for Dudley Local Authority.

A number of Data Processing agreements in place with RM, covering services such as RM's school management information system and RM Unify. These systems make some use of personal data which is held away from school at secure data centres with the RM group.

For further information, please refer to the RM Education website.

If you are unable to access the website the postal address is: RM Education, 140 Eastern Avenue, Milton Park, Abingdon, Oxon OX14 4SB. RM Education Ltd is a subsidiary of RM plc

https://www.rmplc.com/pdf/web/viewer.html?file=/~/media/PDFs/RM-Plc/Privacy-and-cookies/RM-plc-privacy-policy.pdf

Times Tables Rockstars
Times Tables Rockstars provides online times tables practice for pupils and an overview for teachers. They are hosted completely online and are web browser driven. Access to Times Tables Rockstars resources is through the school's learning platform. For further information, please refer to the Times Tables Rockstars website.

If you are unable to access the website, the postal address is: Maths Circle Ltd, Ossory Offices, Hazelwood Lane, Ampthill, MK45 2HF

https://ttrockstars.com/page/privacy

Rising Stars (My Assessment and Reporting Kit)
MARK is an online testing and reporting tool designed to help teachers analyse assessment data. Paper test scores are entered on to the online marksheets so teachers can analyse gaps in learning to inform targeted teaching. For further information, please refer to the Rising Stars (My Assessment and Reporting Kit) website.

If you are unable to access the website, the postal address is: Rising Stars UK Ltd, Carmelite House, 50 Victoria Embankment, London, EC4Y 0DZ.

https://www.hoddereducation.co.uk/privacynotice

Class Dojo
ClassDojo is a school communication platform that teachers, students, and families use to share what's being learned in the classroom home through reward points and messages. For more information, please refer to the Class Dojo website.

Greenfield Primary School has undertaken a Data Protection Impact Assessment for Class Dojo.

https://www.classdojo.com/en-gb/privacy/?redirect=true

Nessy
Nessy is an online program designed to help students of all abilities learn to read, write, spell and type. For more information, visit the Nessy site.

https://www.nessy.com/uk/privacy-policy/

Wonde

Wonde enables accessibility to personal data from the school's Management Information System to deliver a variety of apps and services on behalf of the school. As such Wonde ensures information security and enables the school to manage what access is given to personal data hosted on the school's Management Information System. Wonde connects MyConcern, Renaissance Learning, Teachers2Parents (Eduspot), Free School Meals to the school's MIS.

Greenfield Primary School has undertaken a Data Protection Impact Assessment for Wonde.

https://wonde.com/privacy-policy

SchoolMoney (Eduspot)

SchoolMoney is a secure online payments system enabling parents to pre-book and pay for school dinners. There is also the functionality to pay for breakfast and after school club(s), uniform and school trips (giving consent and allowing payment). Parents can make online banking payments or make school payments in supermarkets, newsagents and post offices. Parents create an online account by providing primary contact details linked to their child. There is also the additional functionality of the SchoolMoney app by which the school can communicate with the parent. SchoolMoney helps to deliver a cashless and cost effective solution to the school.

Greenfield Primary School has undertaken a Data Protection Impact Assessment for SchoolMoney.

https://eduspot.co.uk/privacy-policy/

MyConcern

My Concern is a software system which enables the recording and sharing of Safeguarding Information, including attendance and behavioural information of children and families at our school.

Greenfield Primary School has undertaken a Data Protection Impact Assessment for MyConcern.

https://www.myconcern.co.uk/our-privacy-policy/

Renaissance Learning

Renaissance Learning is an assessment software. We use Accelerated Reader to monitor our students' progress in reading.

Greenfield Primary School has undertaken a Data Protection Impact Assessment for Renaissance Learning.

http://www.renlearn.co.uk/about-us/privacy/

MyMaths

MyMaths is a subscription-based mathematics website which can be used on interactive whiteboards or by students and teachers at home. It is owned and operated by Oxford University Press. MyMaths provides interactive maths resources such as lessons and self-marking homework tasks for use in the classroom and at home. We use MyMaths to

support the Maths curriculum taught in school and at home.

https://global.oup.com/privacy?cc=gb

EVOLVE (EDU Focus)
EVOLVEvisits is an online system for the planning, approval and management of educational visits, sports fixtures and extra-curricular activities. We use EVOLVE to support the planning, approval and management of educational visits and other activities.

https://edufocus.co.uk/pages/evolve/gdpr.asp

Edenred
Edenred has been approved by the Department for Education to manage the issuing of supermarket vouchers. The personal data used will be kept to only that which is necessary to deliver the service

https://www.edenred.co.uk/legal/legal-entity/privacy-policy/

Readiwriter/Spellodrome
Is an online spelling program giving you the tools, guidance and confidence to deliver meaningful spelling instruction to your class. Make students' spelling learning stick. Using best-practice gamification and powerful pedagogical approaches, Readiwriter Spelling delivers engaging activities and games that help students develop a deeper and more comprehensive understanding of spelling and vocabulary.

https://www.3plearning.com/privacy/

Provision Map - TES
Provision Map is packed with features designed to reduce workload and help manage SEND and Pupil Premium. The software makes it **fast** and **easy** to **map out interventions** and to keep track of what pupils and staff are involved with in each intervention you have running.

https://www.edukey.co.uk/gdpr-compliance/

E-Reception – media base direct
Reception Book is the digital alternative to the traditional paper visitor, staff & contractor check-in books. Staff, pupils and visitor's check-in, their details are stored on a secure dashboard which is GDPR compliant. This provides school with a real-time fire list and reports

https://www.mediabasedirect.com/privacy

Oxford Owl
Oxford Owl is an award-winning website from Oxford University Press, created to support learning both at home and at school. It is home to fantastic online teaching, learning and assessment resources, expert support as well as a range of subscriptions for primary schools.

https://global.oup.com/privacy?cc=gb

We are committed to working with the local authority in protecting and safeguarding children and young people in the Borough. As a consequence, we intend, where relevant to do so, to share information with the Multi-Agency Safeguarding Hub (MASH) which is a co-located arrangement of agencies including the local authority, Police, NHS Trusts and Probation Service integrated into a multi-agency team.

The MASH is the single point of contact for safeguarding concerns, the MASH share information appropriately and securely on children or young people in order to take timely and appropriate actions. The teams also provide information and advice across a range of child and family services.

Where a pupil/parent/carer has been involved in an accident, an Accident/Incident Report Form will be completed which will include details of the accident including information about you. This information will be passed to the Corporate Health and Safety Team at the local authority. This information will be accessed by Dudley MBC employees, who legally require access to this data, for purposes related to this incident, and may be shared with others to allow us to comply with our statutory duties'.

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 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.

Data collection requirements:
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.

Local Authorities

We may be required to share information about our pupils with the local authority to ensure that they can conduct their statutory duties under the Schools Admission Code, including conducting Fair Access Panels.

Department for Education

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our pupils with the Department for Education (DfE) either directly or via our local authority for the purpose of those data collections, under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

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

For more information, please see 'How Government uses your data' section.

Requesting access to your personal data
Under data protection legislation, parents and pupils 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 our Data Protection Officer.

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; and
- a right to seek redress, either through the ICO, or through the courts

If you have a concern or complaint 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/

For further information on how to request access to personal information held centrally by DfE, please see the 'How Government uses your data' section of this notice.

Withdrawal of consent and the right to lodge a complaint
Where we are processing your personal data with your consent, for example, contacting you through ParentMail, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the Headteacher, 01384 818585.

Last updated
We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated on 9th March 2021.

Contact:
If you would like to discuss anything in this privacy notice, please contact:

YourIG Data Protection Officer Service, Dudley MBC, The Council House, Dudley, West Midlands, DY1 1HF
Email: YourIGDPOService@dudley.gov.uk Tel: 01384 815607

How Government uses your data
The pupil data that we lawfully share with the DfE through data collections:
- underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- informs 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).

- supports 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

Data collection requirements

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)

Much of the data about pupils in England goes on to be held in 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-pupil-database-user-guide-and-supporting-information

Sharing by the Department

The law allows the Department to share pupils' personal data with certain third parties, including:

- schools
- local authorities
- researchers
- organisations connected with promoting the education or wellbeing of children in England
- other government departments and agencies
- organisations fighting or identifying crime

For more information about the Department's NPD data sharing process, please visit: https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

Organisations fighting or identifying crime may use their legal powers to contact DfE to request access to individual level information relevant to detecting that crime. Whilst numbers fluctuate slightly over time, DfE typically supplies data on around 600 pupils per year to the Home Office and roughly one per year to the Police.

For information about which organisations the Department has provided pupil information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the Police please visit the following website: https://www.gov.uk/government/publications/dfe-external-data-shares

How to find out what personal information DfE hold about you

Under the terms of the Data Protection Act 2018, you are entitled to ask the Department:

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:

https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter

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