



# GDPR Privacy Notice

## Who processes your information?

New Hartley First School ('NHFS') is the data controller of the personal information you provide to it. This means the school determines the purposes for which and the manner in which, any personal data relating to pupils and their families is to be processed. Mrs. Victoria Frost acts as a representative for the school with regard to its data controller responsibilities; she can be contacted on 0191 2371218 or at [admin@newhartley.northumberland.sch.uk](mailto:admin@newhartley.northumberland.sch.uk).

Much of the personal data that NHFS processes falls under a specific legal basis and is necessary for the school to comply with legal and regulatory requirements. This means that your specific consent will not be needed for the school to process your personal data or that of your children.

NHFS will ask for your explicit consent to anything that isn't within the normal business of the school, particularly if a third party is processing the data. Your explicit consent is required where the school collects information for fundraising or marketing for example. Where your consent is required for a particular processing activity, NHFS will tell you why the data is being used, how the data will be used, if any Personal Data will be sent to or shared with a third party (where third parties are used, we will impose strict obligations requiring those parties to be GDPR compliant) and ask for your explicit consent. You have the right to withdraw this consent at any time unless the school has another lawful basis to process the data.

Mrs. Emma-Marie Reed is the Data Protection Officer ('DPO') for NHFS. The role of the DPO is to oversee and monitor the school's data protection procedures and to ensure they are compliant with the General Data Protection Regulations ('GDPR'). The data protection officer can be contacted on 0191 2370384 or at [emma-marie.reed@hollywell.northumberland.sch.uk](mailto:emma-marie.reed@hollywell.northumberland.sch.uk)

## Who does the data relate to?

- ☐ Pupils of NHFS (prospective and current)
- ☐ Parents/carers of pupils
- ☐ Any emergency contacts for pupils

## Why does NHFS collect and use your information?

NHFS collects and uses personal data relating to pupils and their families, and also receives information from previous schools, the Local Authority ('LA') and/or the Department for Education ('DfE').

NHFS can lawfully process personal data pursuant to Article 6 and Article 9 of the GDPR as NHFS is under a legal obligation to do so and needs to comply with:

- ☐ Education Act 1996

- ☐ Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013

It is also in the public interest that data is processed to ensure that NHFS functions effectively.

As explained above, your consent may be required to processing in certain circumstances.

NHFS may process some special category data for reasons of public interest for the effective operation of the school, because it is necessary for legal or regulatory purposes or, if required, on the basis of your consent.

In accordance with the above, the personal data of pupils and their families is collected and used for the following reasons:

- ☐ To support pupil learning and assess any support needs
- ☐ To monitor and report on pupil progress
- ☐ To provide appropriate pastoral care
- ☐ To assess the quality of service
- ☐ To comply with the law regarding data sharing
- ☐ To safeguard pupils

### **Which data is collected?**

The school collects, holds and shares the following:

- ☐ Personal information – e.g. names, date of birth, pupil numbers and addresses
- ☐ Emergency contact information including names, addresses, phone numbers, work phone numbers and email addresses
- ☐ Free school meal eligibility
- ☐ Attendance information – e.g. number of absences and absence reasons
- ☐ Assessment information – e.g. national curriculum assessment results
- ☐ Behavioural information – e.g. number of temporary exclusions
- ☐ Parent/carers national insurance numbers – for funding purposes
- ☐ Pupil travel arrangements to and from school

The school may also collect, hold and share the following special category data:

- ☐ Characteristics – e.g. ethnicity, language, nationality, country of birth – this information is used in school census and LA data captures

- ☐ Relevant medical information – to provide appropriate care within school
- ☐ Information relating to SEND – used in school census

On occasions, the school may be informed of offence allegations or information, this information will be referred to the relevant official authority.

When collecting data, the school will let you know if your consent is required for the processing of that information.

### **How long is your data stored for?**

Personal data relating to pupils at New Hartley First School and their families is stored in line with the school's GDPR Data Protection Policy.

In accordance with the GDPR, the school does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected and in accordance with any legal or reporting requirements.

### **Will my information be shared?**

NHFS currently communicates school information via a smartphone app, Primary School App to facilitate home-school communication.

In some cases, your data will be shared with a third party processor (e.g. school visits, sport coaching providers, school transitions). This will only be done with your consent, unless the law requires or allows the school to share your data. Where the school outsources data to a third party processor, the same data protection standards that NHFS upholds will be imposed on the processor.

The school is required to share pupils' data with the DfE on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

NHFS is required to share information about its pupils with the LA and 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 the school by the DfE (for example, via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

The National Pupil Database (NPD) is managed by the DfE and contains information about pupils in schools in England. NHFS is required by law to provide information about its pupils to the DfE as part of statutory data collections, such as the school census. Some of this information is then stored in the NPD. The DfE may share information about NHFS pupils from the NDP with third parties who promote the education or wellbeing of children in England by:

- ☐ Conducting research or analysis
- ☐ Producing statistics
- ☐ Providing information, advice or guidance

The DfE has processes in place to ensure the confidentiality of any data shared from the NDP is maintained.

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

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

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

The school routinely shares pupils' information with:

- ☐ Pupils' destinations upon leaving the school
- ☐ The LA
- ☐ The NHS
- ☐ The DfE

## **What are your rights?**

Parents and pupils have the following rights in relation to the processing of their personal data.

You have the right to:

- ☐ Be informed about how NHFS uses your personal data
- ☐ Object to your personal data being processed in certain circumstances or where the controller cannot demonstrate legitimate grounds for processing the information
- ☐ Request access to the personal data that NHFS holds
- ☐ Request that your personal data is amended if it is inaccurate or incomplete
- ☐ Request that your personal data is erased where there is no compelling reason for its continued processing
- ☐ Request that the processing of your data is restricted
- ☐ Data portability – moving, copying or transferring your data easily from one IT environment to another

Where the processing of your data is based on your consent, you have the right to withdraw this consent at any time.

If you have a concern about the way NHFS and/or the DfE is collecting or using your personal data, you can raise a concern with the Information Commissioner's Office (ICO). The ICO can be contacted on 0303 123 1113, Monday-Friday 9am-5pm.

### **Where can you find out more information?**

If you would like to find out more information about how we and/or the DfE collect, use and store your personal data, please visit our website [www.newhartley.northumberland.sch.uk](http://www.newhartley.northumberland.sch.uk) and download our GDPR Data Protection Policy and relevant information.

### **Changes to this Privacy Notice**

NHFS reserves the right to update this privacy notice at any time and will provide you with a new privacy notice if any substantial updates are made. NHFS may also notify you in other ways from time to time about the processing of your personal information.

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### **GDPR Privacy Notice Declaration**

I \_\_\_\_\_, declare that I have read the privacy notice from New Hartley First School and understand:

- ☐ New Hartley First School has a legal and legitimate interest to collect and process my personal data in order to meet statutory and regulatory requirements.
- ☐ How my data is used.
- ☐ My rights in relation to the processing of my personal data.
- ☐ New Hartley First School may share my data with the Department for Education and the Local Authority.
- ☐ New Hartley First School will not share my data with any other third parties without my consent, unless the school has a lawful basis for doing so.
- ☐ New Hartley First School will always ask for explicit consent where this is required, and I must provide this consent if I agree to the data being processed.
- ☐ My data is retained in line with the school's GDPR Data Protection Policy.
- ☐ Where I can find out more information about the processing of my personal data.

Signed: \_\_\_\_\_ Parent/Carer      Date: \_\_\_\_\_

also on behalf of my child: \_\_\_\_\_ Class: \_\_\_\_\_