



Privacy Notice

1. Introduction

1.1 This document sets out how Thurlby Community Primary Academy ('we') uses the personal information it holds on its employees, families and other stakeholders ('you').

1.2 Thurlby Community Primary Academy is known as the 'Controller' of the personal data that we collect about you. We process and hold your information in order to provide a public service. This Privacy Notice explains how we use and share your information.

2. Why do we collect your personal information?

2.1 Thurlby Community Primary Academy holds a variety of personal information which is used in order to deliver a public service (as part of Lincolnshire County Council's Children's Services).

2.2 We will process your information for the following purposes:

- to ensure that we comply with the law;
- to allow us to be able to communicate and provide services appropriate to your needs and interests;
- to safeguard individuals;
- to allow analysis of data so we can improve the quality of education and care we provide.

2.3 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. 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>. Data is stored in the National Pupil Database (NPD). See Appendix 1.

2.4 For the school workforce, we collect data to enable the development of a comprehensive picture of the workforce and how it is deployed. See Appendix 2. We are required to share information about our school employees with our local authority (LA) and the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

2.5 We will only collect personal data that we need in order to deliver a service to you and as far as is reasonable and practicable we will ensure that the information recorded is accurate and kept up to date.

3. What personal data do we collect?

3.1 We will collect personal data about you in order to help us deliver the right service. The personal data we collect may include:

- Name, address and other contact details
- family details and social circumstances, such as language spoken, eligibility for free school meals
- employment and education details (such as National Insurance number, DfE teacher number, qualifications, employment history). This is to ensure persons appointed to positions are suitable to work with children
- visual images

- biometric finger print data (Staff only)
- licenses or permits held
- pupil records to include attendance data, assessment outcomes, special educational needs, disabilities, medical information, behaviour, child protection

3.2 We also process special categories of personal data that may include:

- physical or mental health needs (for example, following an absence)
- racial or ethnic origin
- trade union membership
- political affiliation and political opinions
- criminal convictions data
- civil and criminal proceedings, outcomes and sentences
- religious or other beliefs of a similar nature

4. How do we collect your personal data?

4.1 Information may be collected in many different ways but predominantly as set out below:

4.2 Face to Face. If you visit our school or we visit you we may collect your personal data.

4.3 Telephone calls. We may write down what you say to us. Phone calls to our school are not recorded.

4.4 Emails. If you email us we may keep a record of your email address and the email as evidence of the contact. We are unable to guarantee the security of any email initiated by you and we recommend that you keep the amount of confidential information you send to us via email to a minimum. We recommend that where possible you speak with us face to face.

4.5 Written communication (letters, surveys). We may keep a copy of any written communication you send to us.

5. Who do we get your personal information from?

5.1 Personal information is collected in a number of ways:

- Provided to us directly by you when a child is enrolled at our school, when you are interviewed for a job at our school, when you are appointed to a role;
 - Provided to us by members of the public, sometimes anonymously, for example in the case of child protection;
 - Provided by another professional organisation involved in the provision of services.

5.2 Professional organisations may include other public sector bodies such as health, police services and other schools. We may also receive information from government bodies and regulators such as the Department of Work and Pensions, Her Majesty's Revenue and Customs and the Department for Education.

6. Who do we share your information with?

6.1 The type of service you receive and your personal circumstances will dictate who we share your personal data with. Where applicable, we will share your data with organisations that deliver services on behalf of Thurlby Primary School.

6.2 We will only share your information where it is necessary to do so. We will not share your information without your consent unless the law requires or allows us to do so.

6.3 Where necessary we may share your information with the following categories of recipients:

- Healthcare, social and welfare organisations and professionals
- Providers of goods and services, such as photographers, pay roll, Human Resources
- For pupils, the school that you move to after leaving our school, our Local Authority (or one that you move to) and the Department for Education under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.
- Financial organisations, including debt collection, tracing and credit referencing agencies
- Local and central government
- Ombudsman and regulatory authorities
- Professional advisors and consultants
- Police forces, other law enforcement and prosecuting authorities
- Voluntary and charitable organisations
- Disclosure and Barring Service. (We require three forms of identification plus proof that you have the right to work in the UK)
- Courts and Tribunals

7. How long do we keep your information for?

7.1 We are required to retain your personal data only for as long as is necessary, after which it will be securely destroyed in line with Lincolnshire County Council's retention policy or the specific requirements of the organisation who has shared data with us.

7.2 Retention periods can vary and will depend on various criteria including the purpose of processing, regulatory and legal requirements, and internal organisational need. Retention periods are defined within the Council's retention guidelines, which can be found <https://www.lincolnshire.gov.uk/local-democracy/information-governance/records-management/>

8. How do we keep your data safe?

8.1 We have an information assurance framework in place which ensures that appropriate technical and organisational measures are in place to help keep your information secure and to reduce the risk of loss and theft.

8.2 Access to information is strictly controlled based on the role of the professional.

8.3 All staff are required to undertake regular data protection training and must comply with a variety of security policies designed to keep your information secure.

8.4 Your personal data is not processed outside of the EU by Thurlby Primary Academy (as part of Lincolnshire County Council).

9. Your Rights

9.1 You have a number of rights which relate to your personal data.

9.2 You are entitled to request access to any personal data we hold about you and you can also request a copy. Please contact Mrs Katherine Finch , Head of School in the first instance.

9.3 Where we are relying on your consent to process your personal data you are entitled to withdraw your consent at any time.

9.4 You can also request that we correct any personal data we hold about you that you believe is inaccurate; request that we erase your personal data; request that we stop processing all or some of it.

9.5 We are obliged to consider and respond to any such request within one calendar month.

10. Further Information

10.1 If you wish to make a request or make a complaint about how we have handled your personal data please contact The Data Protection Officer at DPO@lincolnshire.gov.uk

10.2 Alternatively, you can contact the council by writing to: Lincolnshire County Council, County Offices, Newland, Lincoln, LN1 1YL or telephone: 01522 552222

Or email: customer_services@lincolnshire.gov.uk or fax: 01522 516137 Mini-com: 01522 552055

10.3 If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law you can complain to the Information Commissioner's Office (ICO) www.ico.org.uk

11. Notice Update

11.1 This Privacy Notice was last updated May 2018.

Appendix 1

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.

We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information about Individual Pupils) (England) Regulations 2013.

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

The Department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our 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 more information about the department's data sharing process, please visit:

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

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

Appendix 2

The categories of school workforce information that we collect, process, hold and share include:

- personal information (such as name, employee or teacher number, national insurance number, address and contact telephone number)
- special categories of data including characteristics information such as gender, age, ethnic group

- contract information (such as start dates, hours worked, post, roles and salary information)
- work absence information (such as number of absences and reasons)
- qualifications (and, where relevant, subjects taught)

We use school workforce data to:

- enable the development of a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- enable individuals to be paid

We process this information under 'contractual' and under 'employment law'.

[An example you may wish to consider for data collection purposes (Departmental Censuses) is the Education Act 1996 – this information can be found in the guide documents on the following website <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

Whilst the majority of 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 whether you are required to provide certain school workforce information to us or if you have a choice in this.

We hold school workforce data in line with the retention period outlined by Lincolnshire County Council.

We routinely share this information with:

- our local authority
- the Department for Education (DfE)

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

We are required to share information about our workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

We share personal data with the Department for Education (DfE) on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding / expenditure and the assessment educational attainment.

We are required to share information about our school employees with our local authority (LA) and the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

The DfE collects and processes personal data relating to those employed by schools and local authorities that work in state funded schools. All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to <https://www.gov.uk/education/datacollection-and-censuses-for-schools>.

The department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal 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 securely store and handle the data

To be granted access to school workforce information, organisations must comply with its 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>

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

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact Graham Clegg , Headteacher, Thurlby Primary School

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
- claim compensation for damages caused by a breach of the Data Protection regulations

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

If you would like to discuss anything in this privacy notice, please contact: Mrs Katherine Finch, Head of School