

Killinchy Primary School



Privacy Notice May 2018

Version	Date	Revision Author	Summary of Changes
1	25 th May 2018	Mr C. Currie	Amended EA Template Policy for use at Killinchy.

PRIVACY NOTICE

May 2018



Privacy Notice For Pupils & Parents/Families/Carers/Legal Guardians

ABOUT US

Killinchy Primary School is the data controller of the personal information we hold about our pupils and their parents/families/carers/legal guardians. This means that we are responsible for deciding how we hold and use the personal information which we collect.

We are required under the General Data Protection Regulation (GDPR) to notify you of the information contained in this privacy notice.

We collect and use pupil information under the Education Act (Northern Ireland) 2014 and other legislation. You may find the specific legislation at <https://www.education-ni.gov.uk/departments/education-legislation>.

The majority of pupil information you provide to us is information which you are legally obliged to provide but some pupil information is provided to us on a voluntary basis. When collecting information from you we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

This notice applies to prospective, current and former pupils and their families/carers/legal guardians and those applying for a place at the school and their families/carers/legal guardians. We may update this notice at any time but if we do so, we will inform you as soon as reasonably practicable.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information and what your rights are under the GDPR.

If you have any questions about this privacy notice or how we handle personal information, please contact the Principal who will deal with your query. The Principal can be contacted via email at ccurrie889@c2kni.net or by telephone on 028 97541132.

Our **Data Protection Officer is the Education Authority** and it monitors the school's data protection procedures to ensure they meet the standards and requirements of the GDPR.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO's details are as follows:

The Information Commissioner's Office – Northern Ireland

3rd Floor
14 Cromac Place,
Belfast
BT7 2JB

Telephone: 028 9027 8757 / 0303 123 1114

Email: ni@ico.org.uk

HOW DO WE COLLECT AND HOLD PERSONAL INFORMATION?

We collect some personal information about our pupils and their families/carers/legal guardians during a pupil's application process to the school. This information is also periodically updated as a pupil moves through the school.

We will sometimes collect additional information from third parties such as the Education Authority, Department of Education, examination board or previous school attended by a pupil.

We mainly collect personal information about our pupils and their families/carers/legal guardians throughout the course of the pupil's time at the school, for instance when completing educational visit consent forms, from statutory curriculum assessments and throughout our relationship with a pupil when we are exercising our legal obligations as a public educational body and during our pastoral care.

1.0 The types of data we collect

1.1 Personal Information

Examples of Information Held

Names, addresses, Unique Pupil Numbers, contact phone numbers.

Why we collect this information:

To assist administrative processes including contacting parents in emergency, collating databases, monitoring attendance, taking decisions on enrolment, transfer etc.

All personal data is held digitally on our internal software (**SIMS**) which enables us to eg. easily collate pupil class lists and link with 'Teachers2Parents' for text-messages, emails and payments. SIMS has many services within it which can also be used to identify academic trends, underperformance etc. A number of our 3rd Party services link directly into it eg. GL Assessment will use pupils' DOBs in calculating standardised scores.

Lawful basis on which we use this information:

This information is required (and largely collected on behalf of) the Education Authority but we also need all of this information to carry out our statutory educational and Safeguarding responsibilities.

Who has access to this information:

- The Department of Education
- The Education Authority
- C2K
- Partner schools (on request)
- Health & Social Services / PSNI (on request)
- CCEA (NI's curriculum and examinations body) ([click to view Privacy Notice](#))
- GL Assessment ([click to view Data Policy](#))
- Teachers2Parents (contact details to enable better home/school communication) ([click to view Privacy Notice](#))
- Providers of extra-curricular and sporting services (on request)
- Providers of school trips and insurance companies (on request)

1.2 Characteristics

Examples of Information Held

Ethnicity, language, country of birth and FSM eligibility.

Why we collect this information:

It is specifically requested by the Department of Education/Education Authority so they can carry out statistical analyses which, in turn, are used to allocate funding and improve their services.

Lawful basis on which we use this information:

Statutory requirement from the Department of Education.

Who has access to this information:

- The Department of Education
- The Education Authority
- C2K
- Partner schools (on request)
- GL Assessment i.e. specific analysis of pupils receiving FSM
- Health & Social Services / PSNI (on request)

1.3 Attendance Information

Examples of Information Held

Number of absences, reasons for absences, year-on-year statistics, % attendance.

Why we collect this information:

So we can monitor pupil attendance and in turn, ensure children are receiving their entitled quota of statutory education. Attendance which drops to concerning levels is referred to the Educational Welfare Officer and may result in intervention from Social Services and/or prosecution.

Lawful basis on which we use this information:

Statutory obligation on the school to ensure the welfare of every child and, when necessary, intervene when parental responsibilities are not being upheld- compromising the child's right to an education.

Who has access to this information:

- The Department of Education
- The Education Authority
- C2K
- Partner schools (on request)
- Health & Social Services / PSNI (on request)

1.4 Academic Information

Examples of Information Held

Formal test results/scores, teacher observations, transition notes, annual reports.

Why we collect this information:

So we can carry out our statutory function of delivering, monitoring and evaluating a pupil's learning progress and provide them an appropriate learning programme. The collection of this information also enables us to report accurately to parents on the progress of their children's learning.

Lawful basis on which we use this information:

Statutory requirement for a school to fulfil its duty.

Who has access to this information:

- The Department of Education
- The Education Authority
- CCEA (NI's curriculum and examinations body) ([click to view Privacy Notice](#))
- GL Assessment ([click to view Data Policy](#))
- C2K (approved DE IT Platform)
- Health & Social Services
- Partner schools (on request)
- Other statutory bodies

1.5 Special Educational Needs

Examples of Information Held

Personal Learning Plans (PLPs), statements of SEN, psychologist (or medical reports), test results, teacher notes, annual reviews etc.

Why we collect this information:

So we can carry out our statutory function of delivering, monitoring and evaluating a pupil's learning progress and provide them an appropriate learning programme. Records may come in the form of

Lawful basis on which we use this information:

Statutory requirement for a school to fulfil its duty.

Who has access to this information:

- The Department of Education
- The Education Authority
- Partner schools
- Health & Social Services (on requests)
- 3rd Party SEN support providers eg. Autism Support Centres
- Other statutory bodies

1.6 Medical Information

Examples of Information Held

Details of short and long-term medical conditions and any associated medication. Also, dietary needs and any special non-medicated conditions such as bed-wetting, anxiety, depression etc.

Why we collect this information:

Requirement so the school can fulfil its Safeguarding responsibilities.

Lawful basis on which we use this information:

Requirement so the school can fulfil its Safeguarding responsibilities.

Who has access to this information:

- The Department of Education
- The Education Authority
- C2K
- Partner schools (on request)
- Health & Social Services (on request)
- Other statutory bodies

1.7 Pastoral and Behavioural Information

Examples of Information Held

Personal family circumstances, any significant trauma or difficulty in a child's life which may affect their wellbeing and education. Also, any significant behaviour concerns.

Why we collect this information:

So we can carry out our statutory functions of educating and safeguarding of all children.

Lawful basis on which we use this information:

Statutory requirement for a school to fulfil its duty.

Who has access to this information:

- The Education Authority (if appropriate)
- Partner schools (if appropriate)
- Health & Social Services / PSNI (on request)
- 3rd Party SEN support providers eg. Family or Behaviour Support Centres
- Private family and behaviour services
- Other statutory bodies

1.8 Photographs and Digital Images (including video)

Examples of Information Held

Photos or digital images of pupils taking part in classroom lessons, extra-curricular activities, school trips, PTA events etc.

Why we collect this information:

There is a statutory requirement on the school to provide evidence of its provision i.e. to the Inspectorate and to CCEA (examinations body). In many cases, especially at the infant end of the school (but not exclusively) photos and videos are an excellent way of showcasing learning and outcomes.

Photos and videos are also an excellent way to celebrate children's achievements and, by doing so, increase their motivation for learning i.e. pupils generally enjoy seeing photos of themselves doing well on notice-boards and school website.

The use of photos and videos can also be an excellent tool for marketing purposes. In an age when pupil enrolment is an integral part of school finance, a positive public image is essential. We achieve this often through publishing digital images on our website, Twitter feed and in the local media.

Lawful basis on which we use this information:

Photos and videos for academic accountability (and evidence purposes) are an excellent means by which we can satisfy our statutory requirement to report on the school's effectiveness.

All photographs and digital images will be used in accordance with the detailed schedule of consent provided by parents ([click here to view](#)).

Who has access to this information:

- School staff
- Statutory bodies (ETI / CCEA etc)
- Users of digital forums (in accordance with list of consent)
- Local media (in accordance with list of consent)

2.0 WHAT PERSONAL INFORMATION DO WE COLLECT, STORE AND USE ABOUT OUR PUPILS' PARENTS/ FAMILIES/ CARERS/ LEGAL GUARDIANS?

We will collect, store and use the following categories of personal information about our pupils'/parents/families/carers/legal guardians:

- **Personal information** (such as name, age, date of birth and photographs as required)
- **Contact information** (such as address and telephone number)
- **CCTV footage** and other information obtained through electronic means (this does not currently apply in Killinchy PS however plans exist for the installation of a new CCTV system which will record and store CCTV footage in line with the CCTV Policy on introduction)

3.0 CONSENT

Whilst the majority of the personal data provided to the school is required for us to comply with our legal obligations, some of that information is provided on a voluntary basis through parental consent (namely, a parent's/carer's/legal guardian's express agreement).

A pupil aged 13 or over is considered capable of giving consent themselves and will not require express agreement from a parent/carer/legal guardian. However, if a child is not considered capable of giving consent themselves for example, due to an identified special educational need, an adult with parental responsibility may exercise the child's data protection rights on their behalf.

Where we need consent, for example in the use of photographs and digital images, the school will provide the person with parental responsibility for a pupil or, if aged 13 or over, the pupil themselves, with a specific and clear notice which explains the reasons why the data is being collected and how the data will be used. You should be aware if you do not consent to our collection of this type of data, this will not affect the standard of education we deliver to the pupil.

If we ask for your consent to use personal information, you can take back this consent at any time by simply contacting us via telephone, written letter or email.

Please be aware that we do not need to obtain parental consent if personal data is to be processed for the purposes of obtaining counselling services for the child.

4.0 HOW LONG IS INFORMATION STORED FOR?

We will only keep personal information for as long as necessary to fulfil the purposes we collected it (for example, to educate and look after pupils) and including for the purposes of satisfying any legal, accounting, or reporting requirements.

We do not store personal data forever; we only hold pupil and family data for as long as we are legally able to do so. However, sometimes we will keep personal information for historical reasons (e.g. year group or sports team photographs) but you will always have a right to ask for it to be destroyed.

This is a link to the Department of Education Document Retention and Disposal Policy which can be found at <https://www.education-ni.gov.uk/publications/disposal-records-schedule>. This will give you more information about how long we keep personal information.

More detailed and school specific information on this can be found in our **Information Asset Register**

In determining the appropriate retention period for personal information, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

5.0 DATA SECURITY

We have put in place appropriate security measures to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a need to know. They will only process personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator (currently the Information Commissioner's Office) of a suspected breach where we are legally required to do so.

6.0 SCHOOLS' CENSUS

The Department of Education has a legal right to ask for particular information under the Education and Libraries (NI) Order 2003 and is referred to as the "School Census". This information includes information on pupil characteristics such as date of birth, gender, ethnicity, religion, free school meal entitlement and special educational needs status.

A number of statistical releases are made available through the Department of Education website covering data on enrolments, participation rates, pupil teacher ratios, school leavers, attendance and school performance.

7.0 YOUR RIGHTS OF ACCESS, CORRECTION, ERASURE AND RESTRICTION

Under GDPR, pupils/parents/families and carers 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 the Principal at ccurrie889@c2kni.net or via telephone on 028 97541132.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate

security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Under certain circumstances, by law a parent/carer/legal guardian or a child over the age of 13 (who is considered competent to do so) has the right to:

- **Request access** to personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and your child and to check that we are lawfully processing it. You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- **Request correction** of the personal information that we hold about you and your child. This enables you to have any incomplete or inaccurate information we hold corrected.
- **Request erasure** of personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of personal information where we are relying on a legitimate interest (or that of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing you and your child's personal information for direct marketing purposes.
- **Request the transfer** of your personal information to another party, for instance a new school.