



Model Privacy Privacy Notice - Pupils



The Cottesloe School

Policy Type:	Statutory
Reviewed by:	Mrs L Kay (Assistant Business Manager), Mrs N Hulland (Business Manager) and Mrs C Stirk (Policies Governor) and Mrs N Cook (Schools DPO)
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1. Introduction

The Cottesloe School, as a data controller for the purposes of the General Data Protection Regulation collects and holds personal information from you about your child and may receive information about your child from their previous school or college, the Local Authority, the Department of Education (DfE) and the Learning Records Service.

The Cottesloe School is a local authority maintained secondary school. The Schools' Data Protection Officer is Nicola Cook at Schools DPO Ltd. The school's Data Protection Lead is Nicola Hulland, Business Manager.

2. The categories of pupil information that we process include:

- Personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- Characteristics (such as ethnicity, language, and free school meal eligibility)
- Safeguarding information (such as court orders and professional involvement)
- Special educational needs (including the needs and ranking)
- Medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- Attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- Assessment and attainment (such as key stage 1 and phonics results, post 16 courses enrolled for and any relevant results)
- Behavioural information (such as exclusions and any relevant alternative provision put in place)
- Information about school trips and extra-curricular visits (such as where and when the visit took place)
- Biometric information to access the school catering facility

We may also collect, use, store and share (when appropriate) information about you that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Information about your characteristics, such as your ethnic background or any special educational needs (SEN)
- Information about any medical conditions you have
- Photographs and CCTV images

We may also hold data about you that we have received from other organisations, including other schools and local authorities.

3. Why we collect and use pupil information

The personal data collected is essential for the school to fulfil their official functions and meet legal requirements.

We collect and use pupil information, for the following purposes:

- A. Support pupil learning
- B. Monitor and report on pupil attainment and progress
- C. Provide appropriate pastoral care
- D. Protect the welfare of pupils and others in our school
- E. Meet our legal obligations
- F. Administer school admissions
- G. Run our school safely and effectively
- H. Assess the quality of our services.

We collect information about pupils before they join our school and keep this updated as necessary.

Most of the personal information we process is provided directly by parents when their child joins us. The majority of information provided by parents is mandatory, but some may be provided on a voluntary basis. Whenever we collect pupil

information from parents, we will make it clear whether providing it is mandatory or optional.

We may also receive information via secure transfer from another school or setting, or from external professionals supporting a pupil (e.g. educational psychologists, speech therapy etc).

3.1. Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you messages by email or text promoting school events, campaigns, charitable causes or services that you might be interested in.

3.2. Use of your personal data in automated decision-making and profiling

We don't currently put pupils' personal data through any automated decision-making or profiling process. This means we don't make decisions about you using only computers, without any human involvement.

If this changes in the future, we will update this notice to explain the processing to you, including your right to object to it.

3.3. Use of your personal data for filtering and monitoring purposes

While you're in school, we may monitor what material you access on our computers and other IT and communication systems. We do this so that we can:

- Comply with health and safety law and other laws
- Comply with our policies (e.g. Safeguarding policy, Digital Technology Acceptable Use Policy)
- Keep our network(s) and devices safe from people who aren't allowed to access them, and prevent harmful software from damaging our network(s)
- Protect your welfare

3.4. Use of Our Website and Cookies

For information about how we collect and use personal data through our school website, including the use of cookies to improve your browsing experience, please

refer to our full Privacy and Cookies Policy available at:
<https://www.cottesloe.bucks.sch.uk/privacy-cookies/>

This policy explains what data is collected when you visit our website, how it is used, stored, and your rights in relation to this data.

3.5. Our use of CCTV and Door Entry Systems

For the safety and security of our pupils,, staff, and visitors, The Cottesloe School operates a CCTV system and a secure door entry system on our premises.

CCTV: We use CCTV to monitor the school grounds and buildings. The images captured are used to safeguard our pupils and for the prevention and detection of crime, to ensure the safety and security of our community, and to assist in the management of the school. All CCTV footage is handled in strict compliance with data protection laws and is stored securely. Access to the footage is restricted to authorised personnel. We may share footage with law enforcement agencies if required by law or as part of a criminal investigation.

Door Entry Systems: Our door entry systems are in place to control access to the school buildings. They log entry and exit times for security and safeguarding purposes. This data helps us ensure that only authorised individuals are on site and provides a record in the event of an incident. This information is stored securely and is not shared with third parties unless required by law.

3.6. Sixth Form Admissions for External Applicants

For external Sixth Form applicants, we collect information from the student's current school in two strictly separated stages to comply with the School Admissions Code:

- Before an offer is made: We request predicted or mock grades solely to assess if the applicant meets our published academic entry criteria.
- After a conditional offer is made: We request safeguarding, SEND, and pastoral records to prepare for the student's support and transition needs. We also request proof of age (e.g., a passport or 'short' birth certificate, but not a 'long' birth certificate). This post-offer information is never used to determine whether a place is offered.

Lawful Basis: Under the UK GDPR, we process this specific information under 'Public Task' (Article 6(1)(e)), as it is necessary to perform our official duties as an educational provider. We only request the minimum data required and hold it securely.

4. Storing pupil information

We hold pupil data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please read our [Records Management policy](#).

We'll dispose of your personal data securely when we no longer have a legal requirement to retain it.

5. Who we share pupil information with

We routinely share pupil information with:

- Schools that pupils attend after leaving us
- Our local authority to support it in meeting its statutory duties, e.g. school admissions
- Department for Education (DfE), e.g statutory data collections (see Appendix One for information on how the DfE uses pupils' information)
- Companies providing services to our school, e.g catering, educational software, photography, communication services

From time to time, we may also share pupil information with third parties, including:

- NHS health professionals, including the school nurse
- Educational psychologists
- Education Welfare Officers
- Prevent teams to meet the Prevent Duty on schools
- Police and law enforcement agencies
- Courts, if ordered to do so
- Research organisations
- Charities and voluntary organisations.

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

When we share pupil information with third parties, we will always ensure that we share the minimum amount of information necessary for the purpose of the sharing. We will also require them to keep pupil personal information secure and to treat it in accordance with data protection law.

6. The lawful basis on which we use this information

Our school, as a data controller, needs to comply with the UK's General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018. We are required to ensure we have a lawful basis under the GDPR for any processing we carry out on personal data.

Under Article 6 of the GDPR, the lawful bases we rely on for processing pupil information are:

1. We need to comply with a **legal obligation**, e.g. DfE data returns
2. We need to meet our **public task** of running our school and keeping everyone safe
3. We have a **legitimate interest**
4. We have obtained **consent** to use personal information in a certain way
5. We need to protect someone's life (**vital interests**) in an emergency.

Our lawful bases under the GDPR for the purposes listed in section 2 above are as follows:

- a) Support pupil learning - **public task**
- b) Monitor and report on pupil progress and attainment - **legal obligation, public task**
- c) Provide appropriate pastoral care - **public task**
- d) Protect the welfare of pupils and others in our school - **public task**
- e) Meet our legal obligations - **legal obligation**
- f) Administer school admissions - **legal obligation, public task**
- g) Run our school safely and effectively - **public task**
- h) Assess the quality of our services - **legitimate interests.**

Some pupil information requires extra protection because it is considered more sensitive. This includes race, ethnicity, religious beliefs, medical conditions, genetic information and biometric data.

Under Article 9 of the GDPR, if we are processing special category data, we will also rely on one of the following lawful conditions:

- We have **explicit consent**
- To meet our obligations as a data controller, or those of data subjects, in connection with **employment, social security and social protection**
- To meet our **public interest** task of keeping pupils safe and ensuring **equality of opportunity/treatment**
- To establish, exercise or defend **legal claims**
- To protect someone's life (**vital interests**) in an emergency.

In addition, under the UK's Data Protection Act 2018, we rely on the processing conditions at Schedule 1 part 1, paragraphs 8 and 18. These relate

to the processing of special category data for safeguarding and equality of opportunity/treatment. Our Appropriate Policy Document provides more information about this processing.

7. The lawful basis of consent

Whenever we rely on consent as our lawful basis, it must be freely given, informed and clear. It can also be withdrawn at any time by contacting the school lead (details on the first page).

8. Pupils' Data Protection Rights

Under the GDPR pupils have the right to request access to the information about them that we process (a subject access request).

Where a child does not have the maturity to understand their own data rights, a parent can make a subject access request on their behalf. It is generally considered that around the age of 12 a child is mature enough to understand and request access to their information.

Therefore, in our primary school, parents are able to make an access request on behalf of their child; although we will always consider this on a case by case basis.

To make a request for your child's information, please contact the school lead (details on first page).

Pupils (or parents on their behalf, as above) also have the right to:

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

For more information on how we handle subject access requests, please see our Data Protection Policy.

9. Parents' right to access their child's educational record

In our school, as a maintained school, parents have a separate right to access their child's educational record under the Education (Pupil Information, England) Regulations 2005.

The request must be made in writing and the information will be provided within 15 school days of receipt of the request. This is an independent legal right of parents and sits outside of the GDPR.

10. How you can help us

As a school, we have limited staff resources outside of term time. It is really helpful if parents can submit any requests for access to their child's information during term time and not too close to the end of term. This will support us in responding as quickly as possible to any requests, which we always want to do.

11. Any concerns

We take any concerns about our collection and use of personal information very seriously, so please contact us (details on first page) to raise any concerns in the first instance.

If you remain concerned, having done this, you have the right to raise your concerns with the Information Commissioner's Office and you can find more information about how to do this [here](#).

12. Review

This document will be reviewed annually

13. Appendix One - Department for Education

N.B. As the DfE continually makes minor amendments to its privacy notice templates for schools, please insert here, the most up to date DfE information, as required. This can be found on the DfE website: [Data protection: privacy notice model documents - GOV.UK](#) within the DfE templates.