

Inspire - Enable - Achieve



The Vale Federation Privacy Notice - Pupils

Date policy last reviewed: September 2024
Date policy to be reviewed: September 2025

Signed:

 Principal

Date 12th November 2024

David J Pearce Chair of Governors Date 12th November 2024

The Vale Federation

Data Privacy Notice

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

Data Protection Officer: Data Protection Education

**Deputy DPO: Business Director & Finance & IT
Manager**

Telephone: 0800 086 2018

Email: dpo@dataprotection.education

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Privacy Notice – Pupils – Purpose of this Policy

You have a legal right to be informed about how The Vale Federation (includes Booker Park School and Stocklake Park School) uses any personal information that we hold about you. To comply with this, we provide a privacy notice (this document) to you where we are processing your personal data.

We, The Vale Federation (includes Booker Park School and Stocklake Park School) are the ‘data controller’ for the purposes of data protection law. This notice describes how we collect, store and use personal data about pupils at our Federation like you. As a ‘data controller’, we are responsible for deciding what data is collected and how it is processed.

Under the Data Protection Act 2018 and the UK GDPR, we must abide by the principle of transparency and the right of data subjects to be informed about how their data is processed.

This document provides such information. It will be updated occasionally, and updates will be communicated accordingly.

It is your duty to inform us of changes about you and your data.

Privacy Notice - Pupils (How we use pupil information)

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 EHCP, 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 phonics results, post 16 relevant results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- school meals (such as menu choices, payments, account balances, free school meals (FSM))
- school trips and activities (such as personal identifiers, allergens, medical, payments, next of kin)

This list is not exhaustive, to access the current list of categories of information we process please see contact dpo@thevalefederation.com

Why we collect and use pupil information

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

- a) to support pupil learning
- b) to monitor and report on pupil attainment progress
- c) to provide appropriate pastoral care
- d) to assess the quality of our services
- e) to keep children safe (food allergies, or emergency contact details)
- f) to meet the statutory duties placed upon us for the Department for Education (DfE) data

collections

- g) to provide the appropriate therapy support services
- h) to provide the required level of healthcare and support

Under the [UK General Data Protection Regulation \(UK GDPR\)](#), the lawful bases we rely on for processing pupil information are:

- a) Consent: the individual has given valid consent for you to process their personal data for a specific purpose.
- b) Contract: the processing is necessary to perform a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- c) Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).
- d) Vital interests: the processing is necessary to protect someone's life.
- e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

- for the purposes of supporting pupils learning in accordance with the legal basis of a, c and e above
- for the purposes of monitoring and reporting on pupil attainment progress in accordance with the legal basis of a, c and e above
- for the purposes of providing appropriate pastoral care in accordance with the legal basis of a, c, d and e above
- for the purposes of assessing the quality of our services in accordance with the legal basis of b, c and d
- for the purposes of keeping children safe in accordance with the legal basis of c, d and e
- for the purposes of meeting the statutory duties placed upon us from the Department for Education (DfE) data collections in accordance with the legal basis of c and e
- for the purposes of providing the appropriate therapy services in accordance with the legal basis of a, c and d
- for the purposes of providing the level of healthcare and support in accordance with the legal basis of d above

In addition, concerning any special category data of [UK GDPR - Article 9](#):

- DPIA (Data Protection Impact Assessment) are completed for all special category data held
- Special Category Data is restricted access and only used for its specified purpose including medical, emergency, health and keeping pupils safe
- Any special data will always meet one of the following criteria:
 - a) Explicit consent (with a basis in law)
 - c) Vital interests (with a basis in law)
 - d) Health or social care (with a basis in law)

Collecting pupil information

We collect pupil information via:

- Common Transfer File (CTF)
- Any Comms secure transfer file
- Hard copy file, hand delivered or via registered secure post

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it requested on a voluntary basis. In order to comply with the 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.

Storing pupil data

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 visit <https://www.thevalefederation.com/policies-2/gdpr/>.

Further details of our Data Retention Policy can be requested from dpo@thevalefederation.com

Data is currently held as follows:

Data	Where	Security Level	DPIA Completed (if applicable)	Retention Period
Personal, characteristics, absence, qualifications, attainment, parent/guardian information, dietary information, allergy information, medical information, school meals information	Arbor Software System	High, Encrypted	YES	Contact dpo@thevalefederation.com
Personal, characteristics, absence, qualifications, attainment, parent/guardian information,	Filing cabinets (application form data only)	High, Secure Restricted Access Cabinets	n/a	Contact dpo@thevalefederation.com

medical information				
Behaviour information, safeguarding information, medical information	CPOMS Software System	High, Encrypted	YES	Contact dpo@thevalefederation.com
Accident Reports	Smartlog Software System	High, Encrypted	YES	Contact dpo@thevalefederation.com

Who we share pupil information with

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our local authority
- youth support services (pupils aged 13+)
- the Department for Education (DfE)
- The Vale Federation
- Bucks NHS Healthcare Trust
- The Pace Centre (Therapy Services)
- Apex Ability Ltd (Therapy Services)

Why we regularly 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.

Data Type	Legal Basis for Sharing	Shared With	Method of Transfer
Personal, characteristics, absence, qualifications, attainment, parent/guardian information, dietary information, allergy information, medical information, school meals information	Consent: the individual has given valid consent for you to process their personal data for a specific purpose Vital interests: the processing is necessary to protect someone's life.	The Vale Federation	Electronic, Secure Internal Network, Encrypted, Restricted Access

	Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations)		
Personal, characteristics, absence, qualifications, attainment, parent/guardian information, dietary information, allergy information, medical information, school meals information	Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations).	Schools that the pupil(s) attend after leaving us	Electronic, Secure Data Transfer, sealed hard copy files hand delivered/collected/secure post, encrypted
Personal, characteristics	Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations). Consent: the individual has given valid consent for you to process their personal data for a specific purpose.	Youth support services	Electronic, Secure Data Transfer, sealed hard copy files hand delivered/collected/secure post, encrypted
Personal, characteristics, parent/guardian information, medical information	Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations). Vital interests: the processing is	Bucks NHS Healthcare Trust	Electronic, Secure Data Transfer, , encrypted

	necessary to protect someone's life.		
Personal, characteristics, absence, dietary information, allergy information, medical information, behaviour information,	Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations). Vital interests: the processing is necessary to protect someone's life.	The Pace Centre	Electronic, Secure Data Transfer, encrypted
Personal, characteristics, absence, dietary information, allergy information, medical information, behaviour information,	Legal obligation: the processing is necessary for you to comply with the law (not including contractual obligations). Vital interests: the processing is necessary to protect someone's life.	Apex Ability Ltd	Electronic, Secure Data Transfer, encrypted

Youth support services

Pupils aged 13+

Once our pupils reach the age of 13, we also pass pupil information to our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- youth support services
- careers advisers

The information shared is limited to the child's name, address and date of birth. However where a parent or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the child / pupil once they reach the age 16.

Data is securely transferred to the youth support service via electronic secure data transfer, encrypted and is stored in our Arbor Software Solution and held for the period the pupil is at the school, plus 3 years.

Pupils aged 16+

We will also share certain information about pupils aged 16+ with our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- post-16 education and training providers
- youth support services
- careers advisers
- Data is securely transferred to the youth support service via electronic secure data transfer, encrypted and is stored in our Arbor Software Solution and held for for the period the pupil is at the school, plus 3 years.

For more information about services for young people, please visit our local authority website.

Department for Education (DfE)

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 the Department for Education (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. For privacy information on the data the Department for Education collects and uses, please see:

<https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3>

and

<https://www.gov.uk/government/publications/privacy-information-key-stage-4-and-5-and-adult-education>

Requesting access to your personal data

The UK-GDPR gives parents and pupils certain rights about how their information is collected and used. To make a request for your personal information, or be given access to your child's educational record, contact dpo@thevalefederation.com

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.

- the right to ask us for copies of your personal information we have about you – this is called ‘right of access’, this is also known as a subject access request (SAR), data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called ‘right to rectification’.
- the right to ask us to delete your personal information – this is called ‘right to erasure’
- the right to ask us to stop using your information – this is called ‘right to restriction of processing’.
- the ‘right to object to processing’ of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to [complain to the Information Commissioner](#) if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don’t have the right to object, but you have the right to withdraw consent.

If you have a concern 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 [raise a concern with ICO](#).

For further information on how to request access to personal information held centrally by the Department for Education (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, 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 dpo@thevalefederation.com

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 September 2024

Contact

If you would like to discuss anything in this privacy notice, please contact: dpo@thevalefederation.com

How Government uses your data

The pupil data that we lawfully share with the Department for Education (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 (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)

The NPD is owned and managed by the Department for Education (DfE) and contains information about pupils in schools in England. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

The data in the NPD is provided as part of the operation of the education system and is used for research and statistical purposes to improve, and promote, the education and well-being of children in England.

The evidence and data provide DfE, education providers, Parliament and the wider public with a clear picture of how the education and children's services sectors are working in order to better target, and evaluate, policy interventions to help ensure all children are kept safe from harm and receive the best possible education.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-npd-privacy-notice/national-pupil-database-npd-privacy-notice>

Sharing by the Department for Education (DfE)

DfE will only share pupils' personal data where it is lawful, secure and ethical to do so. Where these conditions are met, the law allows the Department for Education (DfE) to share pupils' personal data with certain third parties, including:

- schools and 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 for Education's (DfE) 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 the Department for Education (DfE) to request access to individual level information relevant to detecting that crime.

For information about which organisations the Department for Education (DfE) 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 the Department for Education (DfE) holds about you

Under the terms of the UK GDPR, you are entitled to ask the Department for Education (DfE):

- 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 for Education (DfE), you should make a 'subject access request'. Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at the address below:

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

or

<https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>

To contact The Vale Federation: dpo@thevalefederation.com