



# Honiton Primary School

## Privacy Notice for Parents and Pupils

### How we use parent and pupil information

Data protection legislation gives parents and pupils the right to be informed about what personal data is held on them, how that data is used, who it is shared with and how long it is retained. This privacy notice provides this information, in general terms, in relation to information held on parents and pupils, as well as the lawful basis under which it is collected and retained. If after reading this notice you have any questions relating to the data we hold or how we use it, please contact our Data Protection Officer, whose contact details are listed at the end of this notice. We, Honiton Primary School, are the Data Controller for the purposes of data protection law.

### Categories of information

The categories of information that we collect, hold and share include, but are not limited to:

- personal identifiers and contact details (such as full name, date of birth, unique pupil number (UPN), home address, previous home address, email address, telephone number, contact preferences)
- characteristics (such as ethnicity, language, nationality, country of birth, religious or other beliefs, adopted or in care, free school meal eligibility)
- safeguarding (including concerns about child protection or safety, court orders and professional involvement)
- special educational needs (including EHCPs, needs and ranking)
- medical and administration (such as doctors' information, health checks, dental health, medical conditions, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous school attended)
- assessment and attainment (such as eyfs, phonics, key stage 1, key stage 2, including candidate or examination number)
- exclusions
- behavioural (such as exclusions and any relevant alternative provision put in place)
- correspondence and records of contact
- other information (such as trips and activities, school travel arrangements, name of previous school and reason for leaving, education file from previous school, consent preferences, details about any equipment assigned to you)
- financial (such as bank details, catering and free school meal management, information about local authority funding, eligibility to receive bursary funding or certain benefits)
- images (for internal safeguarding and security purposes, school newsletters, media and promotional purposes, these may be captured during official school photos, class work, activities, performances or on school CCTV)

We may also hold data about parents and pupils that we have received from other organisations, including other schools, local authorities and the Department for Education (DfE).

## Why we collect and use this information

It is essential that personal data is collected in order for our school to fulfil our official functions and meet legal requirements.

We collect and use parent and pupil information for the following purposes, to: a) support pupil learning

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

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing parent and pupil information are:

- for the purposes of (a), (b), (c) & (d) above; in accordance with the legal basis of public task. Collecting this data is necessary to perform tasks that our school is required to perform as part of its statutory function
- for the purposes of (e) above; in accordance with the legal basis of vital interests. Processing this data is necessary in order to protect someone's life
- for the purposes of (f) above; in accordance with the legal basis of legal obligation. Data collected for the DfE census information is covered by:
  - section 537A of the Education Act 1996
  - the Education Act 1996 s29(3)
  - the Education (School Performance Information) (England) Regulations 2007
  - regulations 5 and 8 School Information (England) Regulations 2008
  - the Education (Pupil Registration) (England)(Amendment) Regulations 2013

We may also process personal data where we have obtained the parent's or pupil's consent to use the data in a certain manner. Where we have obtained consent to use personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

Occasionally, where the processing is not part of our performing tasks as a public authority, we may process data under the lawful basis that it is in our legitimate interests or the legitimate interests of a third party to do so. In these circumstances we would be using the data in a way that would be reasonably expected by the parent or pupil concerned and the processing will have a minimal privacy impact or there will be a compelling justification for the processing.

If we need to process any special category data under Article 9 of the UK General Data Protection Regulation (UK GDPR) which is of a more sensitive nature, we will only do so if we have a lawful basis to do so under Paragraph 2 of Article 9 of the UK General Data Protection Regulation (UK GDPR), such as:

- the data subject has given us their explicit consent
- it is necessary for us to carry out our obligations and exercise our or the data subject's specific rights relating to employment, social security and social protection law
- processing is necessary to protect the vital interests of a person where the data subject is physically or legally incapable of giving consent
- processing is necessary for reasons of substantial public interest

Other legal bases listed in Article 9 of the UK General Data Protection Regulation (UK GDPR) may also apply, depending on the processing required.

Some of the reasons listed above for collecting and using parents or pupils' personal data may overlap and it may be that more than one lawful basis applies to our processing of the data.

No decisions are made by our school through automated decision making (including profiling).

## **Collecting parent and pupil information**

Pupil data is essential for the schools' operational use. Whilst the majority of personal information provided to us is mandatory, some of it is provided to us 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 information to us or if you have a choice in this.

We collect the majority of parent and pupil information via registration forms. As well as holding personal data that has been provided by the pupil or parent, we may also hold data provided by other sources, such as:

- other schools (sharing education records with the pupil's new school under the Education (Pupil Information) (England) Regulations 2005)
- local authorities
- government departments or agencies
- police forces, courts, tribunals

## **Storing data**

In order to protect data whilst it is in our possession, we have data protection policies and procedures in place. These include strong organisational and technical measures and these are reviewed regularly.

We hold personal data relating to a parent or pupil throughout the duration of a pupil's attendance at our school. The pupil file will follow the pupil when that pupil leaves the school. However, it will be necessary to retain some data and this will be kept in accordance with our general data protection policy, records retention policy and Information Toolkit for Schools (IRMS). When personal data is no longer needed, we will dispose of it in a secure manner.

For more information on how we keep your data safe, please contact the school's Data Protection Officer whose contact details can be found at the end of this privacy notice, or visit: <https://www.honitonprimary.co.uk/gdpr-foi/>

## **Who we share parent and pupil information with**

We do not share information about parents or pupils with any third party without consent unless the law and our policies allow us to do so.

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.

Data shared with the Department for Education (DfE) underpins school funding and educational attainment policy and monitoring. An example of the information we share with our local authority would be safeguarding concerns or exclusions, under section 11 of the Children's Act 2004 (duty to safeguard and promote the welfare of children) and to enable the local authority to carry out their duties under section 47 of the Children's Act 1989 (duty to investigate and take action to safeguard children). We may also be required to share information about our pupils with the local authority to ensure that they conduct their statutory duties under the Schools Admission Code, including conducting Fair Access Panels.

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 the 'How Government uses your data' section of this notice.

Where there is a legal requirement to do so, or it is otherwise necessary and it complies with data protection law, we may also share information with:

- local authorities – to meet our legal obligations to share certain information such as safeguarding concerns and exclusions
- central government departments or agencies
- Ofsted
- educators and examining bodies
- our auditors
- suppliers and service providers – to enable them to provide the services contracted  health authorities
- security organisations
- health and social welfare organisations
- professional advisers and consultants
- police forces, courts, tribunals
- professional bodies
- the pupil's parents and their representatives
- the pupil's previous and future schools

Honiton Primary School contracts with a number of carefully vetted suppliers and service providers with whom personal data is also shared. Such data is only shared once appropriate assurances have been obtained regarding the way in which the shared data will be processed and protected. Our school may share data with the following suppliers and service providers:

- Devon Education Services (specialist support services in partnership with Devon County Council)
- Bromcomm (school information management system for administration of parent and pupil records, free school meal & pupil premium grant checker)
- Cornerstones Education Ltd (online planning, teaching and assessment service)
- CPOMS Systems Ltd (safeguarding monitoring software)
- EduFocus (Evolve – educational visits, sports fixtures & extra-curricular risk assessment program)

- [Egress Software Technologies](#) (secure email and file sharing service)
- [Equin Ltd](#) (pupil progress and attainment tracker)
- [EZ Education Ltd](#) (maths programme)
- [FFT Education Ltd](#) (pupil tracking and tutoring services)
- [Google](#) (pupil accounts to access learning/teaching tools)
- [Groupcall Ltd](#) (data integrator)
- [H Tempest Ltd](#) (school photographs)
- [Juniper Education PrimarySite Ltd](#) (school website and email system)
- [Microsoft Office 365](#) (cloud service)
- [Nuffield Early Language Intervention \(NELI\)](#) (language and early literacy skills programme)
- [Osborne Technologies](#) (pupil, staff & visitor entry system)
- [Renaissance Learning](#) (reading programmes)
- ParentPay Ltd (online payment system)
- [SCOMIS](#) (school information management system hosted application service, IT Support)
- [Shred-On-Site Ltd](#) (secure waste paper disposal service)
- [Softlink Education](#) (library software)
- [SpeechLink](#) (speech, language and communication needs)
- [The Foundation Stage Forum Ltd](#) (Tapestry online learning journal)
- [Weduc ParentPay Ltd](#) (meal management software)
- [Wonde](#) (data integrator, evouchers)

For further information, please click on the links above to read each company's own privacy notice.

Should we need to transfer personal data to a country or territory outside the European Economic Area, we would do so in accordance with data protection law.

### **Additional information for children in need and looked-after children**

In addition to the details set out in this privacy notice, this section explains how we use supplementary information relating to children in need and looked-after children.

The categories of children in need and looked-after children information that we collect, hold and share include:

- episodes of being a child in need (such as referral information, assessment information, section 47 information, Initial Child Protection information and Child Protection Plan information)
- episodes of being looked after (such as important dates and information on placements)
- outcomes for looked after children (such as whether health and dental assessments are up to date, strengths and difficulties questionnaire scores and offending)
- adoptions (such as dates of key court orders and decisions)
- care leavers (such as their activity and what type of accommodation they have)

We use this additional personal information to:

- a) support these children and monitor their progress
- b) provide them with pastoral care
- c) assess the quality of our services
- d) evaluate and improve our policies on children's social care

Under the UK General Data Protection Regulation (UK GDPR) the lawful basis we rely on for all of these purposes when processing this additional information is that it is processed in accordance with the legal basis of public task. Collecting this data is necessary to perform tasks that our school is required to perform as part of their statutory function.

We share children in need and looked-after children information with:

- the Department for Education (DfE)
- our local authority
- the National Health Service (NHS)
- other appropriate support services as necessary to meet a pupil's individual needs

We do not share information about our children in need or looked-after children with anyone without consent unless the law and our policies allow us to do so. We share children in need and looked-after children's data with the Department for Education (DfE) on a statutory basis; under section 83 of the 1989 Children's Act, section 7 of the Young People's Act 2008 and also section 3 of the Education (Information About Individual Pupils) (England) Regulations 2013. The data that we lawfully share with the Department for Education (DfE) through data collection helps to develop national policies, manage local authority performance, administer and allocate funding and identify and encourage good practice.

To find out more about the data collection requirements placed on us by the DfE go to:

- Children in need: <https://www.gov.uk/guidance/children-in-need-census>
- Children looked after: <https://www.gov.uk/guidance/children-looked-after-return>

## **Requesting access to your personal data and your data protection rights**

Under data protection legislation, parents have the right to request access to information held about them by making a Subject Access Request. Parents can also make a Subject Access Request with respect to their child's data where the child is not considered mature enough to exercise their rights over their own data (widely considered to be under the age of 12) or where the child has provided consent.

If you make a Subject Access Request and we do hold information about you or your child, we will:

- give you a description of the information held
- tell you why we are processing it and for how long we will keep it
- explain where we got it from, if not from you or your child
- tell you who it has been, or will be, shared with
- let you know whether any automated decision-making is being applied to the data, and any consequences of this
- give you a copy of the information in an intelligible form

Depending on the lawful basis under which personal data is held, parents and pupils also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing of your personal data for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have personal data erased or destroyed, restrict the processing of data and have inaccurate personal data rectified
- seek redress, either through the Information Commissioner's Office, or through the courts

In certain circumstances individuals also have the right for their personal information to be transmitted electronically to another organisation.

If you would like to make a Subject Access Request, or exercise another of the above rights, please contact the school or our Data Protection Officer whose contact details are listed at the end of this notice.

### **Withdrawal of consent and the right to lodge a complaint**

Where we have obtained consent to use personal data, this consent can be withdrawn at any time by contacting the school or our Data Protection Liaison Officer:

Alison Carder (DPLO)  
Honiton Primary School  
Clapper Lane  
Honiton  
Devon  
EX14 1QF  
Email: [admin@honiton-pri.devon.sch.uk](mailto:admin@honiton-pri.devon.sch.uk)  
Telephone: 01404 548700

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concerns about our data processing, please raise this concern with us in the first instance by contacting our Data Protection Officer whose contact details are listed at the end of this notice.

Alternatively, you can contact the Information Commissioner's Office:

- report a concern online at <https://ico.org.uk/concerns/>
- call 0303 123 1113 • or write to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

### **Use of your personal data for marketing purposes**

Where you have given us consent to do so, Honiton Primary School may send you marketing or fundraising information by email. This may be information from the PTFA promoting school events, campaigns or charitable causes or services and information in the local area that may be of interest to you. You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by contacting our Data Protection Officer whose contact details are listed at the end of this notice.

### **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 March 2025.

## Contact

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer (DPO):

### **Jenny Goodall**

#### **Data Protection Officer (Schools)**

#### **School Data Protection Team**

**Devon Education Services**, Devon County Council

Room L60, County Hall, Topsham Road, Exeter, EX2 4QD

Tel : 01392 383445

## How Government uses your data

The pupil data that we lawfully share with the 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 (for example; via the school census) go to

<https://www.gov.uk/education/datacollection-and-censuses-for-schools>

## The National Pupil Database (NPD)

Much of the data about pupils in England goes on to be held in 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. To find out more about the NPD, go to <https://www.gov.uk/government/publications/nationalpupil-database-user-guide-and-supportinginformation>.

## Sharing by the Department

The law allows the Department 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's 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 DfE to request access to individual level information relevant to detecting that crime.

For information about which organisations the Department 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 DfE hold about you**

Under the terms of the Data Protection Act 2018, you are entitled to ask the Department:

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

<https://www.gov.uk/government/organisations/department-foreducation/about/personalinformation-charter>

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