BUCKINGHAMSHIRE COUNCIL

Pupils and Parents Privacy Notice

Tylers Green Middle School

Privacy Notice (How we use pupil information)

Under UK data protection law, individuals have a right to be informed about how our school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about pupils and parents and carers of pupils at our school.

We, Tylers Green Middle School, Cock Lane, Tylers Green, Buckinghamshire (tel. 01494 812465) are the 'data controller' for the purposes of UK data protection law.

Our data protection officer is GDPR Sentry Limited.

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

- Personal information (such as name, unique pupil number and address)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Assessment information
- Relevant medical information
- Special educational needs information (including the needs and ranking)
- Exclusion and behavioural information
- Safeguarding information (such as court orders and professional involvement)
- Medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- Financial Information

Why we collect and use this information

We use the pupil data:

- to support pupil / student learning
- to monitor and report on pupil / student progress
- to provide appropriate pastoral care
- to assess the quality of our services
- for safeguarding and child protection including KCSiE 2023 filtering and Monitoring
- to comply with the law regarding data sharing
- to keep children safe (food allergies or emergency contact details)
- to meet the statutory duties placed upon us by the DfE data collections
- to undertake education research and share data

The lawful basis on which we process this information

We collect and use pupil / student information under departmental censuses and the Education Act 1996, for more information on the school census process and requirements see:

https://www.gov.uk/education/data-collection-and-censuses-for-schools

We collect and process data under the following legal basis for processing:

Article 6 (UK GDPR)

1. the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
2. processing is necessary for compliance with a legal obligation to which the controller is subject;

Article 9 (UK GDPR)

1. the data subject has given explicit consent to the processing of their personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject.

Collecting pupil information

Whilst the majority of pupil information you provide to us is mandatory through Common Transfer File (CTF) or secure file transfer from previous school, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you 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 / student data in line with IRMS Toolkit (Information records management service) / internal data retention guidelines data storage including time scales.

We have put in place appropriate security measures to prevent your personal information being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it.

Who we share pupil information with

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- agencies including the School Nurse and the NHS
- curriculum resources (all web resources are checked, and minimal details are shared with online teaching resources)
- Health Authorities
- Health and social welfare organisations

Why we 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.

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.

We are required to share information about our pupils with our local authority (LA) and the Department for Education (DfE) under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

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/data-collection-and-censuses-for-schools.

The National Pupil Database (NPD)

The NPD is owned and managed by the Department for Education and contains information about pupils / students 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. Some of this information is then stored in the NPD. The law that allows this is the **Education (Information About Individual Pupils / students) (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/student 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/student information, (and for which project), please visit the following website:

https://www.gov.uk/government/publications/national-pupil-database-requests-received

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

The Lawful Basis for processing personal data

The lawful bases for processing personal information are:

- In accordance with the 'public task' basis to process data to fulfil our official duties
- in accordance with the 'legal obligation' basis to process data to meet our responsibilities
- In accordance with the 'consent' basis we will get consent from you to use your personal data
- In accordance with the 'vital interests' basis we will use this personal data in a life-or-death situation
- In accordance with the 'contract' basis we need to process personal data to fulfil a contract with you or to help you enter into a contract with us
- In accordance with the 'legitimate interests' basis where there's a minimal privacy impact and we have a compelling reason, including:
    - External providers for residential trips

The Lawful Basis for processing special category data

The lawful bases for processing 'special category' data collected (more sensitive personal information) use the following conditions for processing as set out in UK data protection law:

- We obtained your explicit consent to use your information in a certain way
- We need to use your information under employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The information has already been made obviously public by you
- We need to use it to make or defend against legal claims
- We need to use it for reasons of substantial public interest as defined in legislation

- We need to use it for health or social care purposes, and it's used by, or under the direction of, a professional obliged to confidentiality under law
- We need to use it for public health reasons, and it's used by, or under the direction of, a professional obliged to confidentiality under law
- We need to use it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the use is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made obviously public by you
- We need to use it as part of legal proceedings, to obtain legal advice, or to make or defend against legal claims
- We need to use it for reasons of substantial public interest as defined in legislation

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Requesting access to your personal data

Under data protection legislation, parents and pupils / students 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 records. In the first instance please contact the school Data Protection Lead in the 'contact us' section below.

Access personal information that we hold about you

You have a right to make a 'Subject Access Request' to gain access to personal information that we hold about you and we will (subject to any exemptions that may apply):

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- 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

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances such as verified reperesentation.

Your other data rights

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you 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 and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- in certain circumstances, be notified of a data breach
- make a complaint to the Information Commissioner's Office
- 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 request that you raise your concern with us in the first instance usung the 'contact us' details below. Alternatively, you can contact the Information Commissioner's Office at https://ico.org.uk/concerns/

Other policies which may reference this privacy notice

This Privacy Notice also applies in addition to the School's other relevant terms and conditions and policies, including:

- any contract between the School and its staff or the parents of students;
- the School's policy on taking, storing and using images of students;
- the School's retention of records policy, (IRMS template);
- the School's safeguarding and pastoral policy;
- the School's Health and Safety policy, including how concerns or incidents are recorded;
- the School's IT policies, including its Acceptable Use policy and Online Safety policy

Further information

Contact

If you would like to discuss anything in this privacy notice, In the first instance please contact the School Data Protection Lead below:

Position	Name	Email	Phone
School Lead	Josephine Rutter	dpo@tylersgreenmiddle.co.uk	01494 812465
Data Protection Officer	GDPR Sentry	info@gdprsentry.com	0113 804 2035

Complaints

If you have a complaint, we ask that you raise this with us in the first instance. Under the Data Usage and Access Act 2025, a complaint should be investigated thoroughly by the company first. Should the outcome conclude escalation is required, the Information Commissioner's Office will be informed. To raise a complaint, please email: dpo@turniton.co.uk or call 01265 537 620 (option 3).

Should you still wish to contact the ICO, you can do so at http://ico.org.uk/concerns/ or call 0303 123 1113.

Policy update information (policy number GDPR-103)

This policy is reviewed annually and updated in line with data protection legislation.

Policy review information

Review date	Reviewed by
02-05-2018	turn IT on
08-08-2019	turn IT on
04-08-2020	turn IT on
02-08-2021	turn IT on
04-08-2022	turn IT on
01-08-2023	turn IT on
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01-08-2025	turn IT on

Policy update information

Review date	Revision	Description on change	By
02-05-2018	1.00	Draft release	turn IT on
03-05-2018	1.00	Full release	turn IT on
08-08-2019	1.01	Full release	turn IT on
02-08-2021	1.02	Full release	turn IT on
01-08-2023	1.03	Full release	turn IT on
01-08-2023	1.04	Full release	turn IT on
01-08-2025	1.05	Full release	turn IT on