Privacy Notice (How we use your information)

This notice is aimed at pupils, parents/carers – Hawthorn Primary School should decide if they pass this notice to the children themselves as well as parents/carers. This would depend on if the child is old enough and mature enough to understand the notice. If you decide to provide this notice to a child, then you should ensure that it is age appropriate.

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

- Personal information (such as names, unique pupil number and address, adult emergency contact information)
- Special Categories (such as Ethnicity, Language, Nationality, Country of birth & Religion)
- Characteristics (such as free school meal eligibility, Pupil Premium Information)
- Safeguarding information (such as court orders and professional involvement)
- Medical and administration (such as doctor information, child health, dental health, allergies, medication, and dietary requirements)
- Attendance information (such as sessions attended, number of absences and absence reasons and any previous schools attended)
- Assessment information and attainment (such as key stage 1, key stage 2 and phonics results)
- Relevant medical information (Special Category Data)
- Special Educational Needs information (including needs and ranking)
- Behavioural information (such as exclusions and any relevant alternative provision put in place)
- Financial Information (such as dinner money transactions, trip transactions)
- CCTV – If Hawthorn Primary School uses CCTV, data will be kept in accordance with Hawthorn Primary School's CCTV policy
- Biometrics – If Hawthorn Primary School uses biometrics, this will be processed in accordance with Hawthorn Primary School's biometric policy

Why we collect and use this information

We use the pupil data:

- to support pupil learning
- to monitor and report on pupil attainment progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to keep children safe (food allergies or emergency contact details)
- to meet the statutory duties placed on us by the Department for Education
- to comply with the law regarding data sharing
- Financial audits
- to provide a rewards structure
- to track how well Hawthorn Primary School is performing as a whole

The lawful basis on which we use this information

We collect and use your information under the Data Protection Act 2018 (sometimes referred to as UKGDPR), article 6, and article 9.

Special category data from article 9 is processed under condition (a) the data subject has given explicit consent to the processing of those personal data for one or more specified purpose.

Collecting pupil information

Pupil data is essential for Hawthorn Primary School's operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with 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. This will be via the pupil information sheet that you are requested to complete upon your child's entry to Hawthorn Primary School. Also, if applicable data will be taken from your previous school using a common transfer file (CTF).

Storing your data

We hold your data if it is lawful for us to do so in accordance with retention guidance taken from the DFE recommended source which is the IRMS toolkit. Should a document not be listed in this toolkit then Hawthorn Primary School will keep a record of why this data is being retained and will produce upon request. Where Hawthorn Primary School does not follow the guidance within this toolkit, Hawthorn Primary School have their own retention document which can be provided upon request.

Any data that we are no longer required to hold lawfully is deleted/destroyed in accordance with Hawthorn Primary School's disposal guidance policy.

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)
- Medical information as appropriate/necessary with the NHS
- If Hawthorn Primary School is a member of an academy trust, then we may where appropriate share pupil information with the trust.

We also routinely share pupil information with:

Third Party Companies/Partners who are assisting Hawthorn Primary School or enhancing a child's education. A list of such companies/partners can be provided upon request. These are not added to the privacy notice due to their fluid nature.

- Where required Hawthorn Primary School will ensure that a data processing agreement is in place.
- We will ensure that a Privacy Impact Assessment (PIA) is carried for any new system that Hawthorn Primary School acquires.
- We will ensure that if any personal data is transferred to a country that the UK deem to not have adequate data protection laws, that a Standard Contractual Clause (SCC) is in place.
- We will ensure for any system that is online and directed at children will be compliant with the age-appropriate design code (children's code)

Why we share your information

- We do not share information about you with anyone without consent unless the law and our policies allow us to do so.
- We share data with schools that your child attends after leaving us to assist with the school transition process.
- We share data with our local authority when it is appropriate to do so to assist in the education of the pupils within our school.
- We share data with third party companies/partners who may require this information to assist the school.
- We share pupil data with the NHS when appropriate to assist with medical needs of children within Hawthorn Primary School.

Department For Education

- 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). Maintained school - under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013. Academies and free schools - under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013. Pupil Referral Units - under regulation 4 of The Education (Information About Individual Pupils) (England) Regulations 2013
- All data is transferred to the DFE securely and held by the DFE under a combination of software and hardware controls which meet the current government security policy framework. government security policy framework.

Data collection requirements:

To find out more about the data collection requirements placed on us by the Department for Education (for example, via Hawthorn Primary School census) go to https://www.gov.uk/education/data-collection-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/national-pupil-database-user-guide-and-supporting-information

Sharing by the Department

The law allows the Department to share pupils' personal data with certain third parties, including:

- schools
- 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. Whilst numbers fluctuate slightly over time, DfE typically supplies data on around 600 pupils per year to the Home Office and roughly 1 per year to the Police.

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-for-education/about/personal-information-charter

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

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 number 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)

Requesting access to your personal data (Subject Access Request)

Under data protection legislation, you have the right to request access to information about yourself that we hold. If a parent/carer is requesting data for their child, then this will be provided to the parent/carer unless Hawthorn Primary School deem the child to be mature enough to understand the data and the subject access process.

Hawthorn Primary School have 30 calendar days to respond to a subject access request. However, this can be extended by a further two months if required.

To make a request please contact Hawthorn Primary School.

Requesting access to your child educational record

In broad terms an education record would be information that Hawthorn Primary School holds on a child which is information all about the child and would require no redaction and would follow the child to a new school.

Examples would be attendance, schoolwork, assessment grades, letters to the parents from Hawthorn Primary School about the child and any other information that Hawthorn Primary School hold on the child that relates solely to that child.

Hawthorn Primary School must respond with the information within 15 working school days. To make a request please contact Hawthorn Primary School.

If Hawthorn Primary School is an academy, then they are under no obligation to provide this information.

You also have the right to the following:

- in certain circumstances to be able 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 (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 on you.
- Have inaccurate/incomplete personal data rectified.
- In certain circumstances restrict processing, request the deletion or removal of personal data where there is no compelling reason for its continued processing.
- a right to seek redress, either through the ICO or through the courts.

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. 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

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 are unhappy with the way we use your personal data then please contact Hawthorn Primary School.

Contact

If you would like to discuss anything in this privacy notice, please contact school who will in turn contact their data protection officer. We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. Version – September 2026.