Privacy Notice – How We Use Pupil Information

Fairlawn Primary School

Version: Version Number 3

Effective Date: 26th November 2025

Review Date: Annually or on change

🛡️ 1. Introduction

This Privacy Notice sets out how Fairlawn Primary School collects, uses, stores, and shares personal information about pupils, in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and guidance from the Information Commissioner's Office (ICO). The school is committed to processing personal data lawfully, fairly, and transparently, and to safeguarding the privacy rights of all pupils.

📒 2. Contact Details

- School Address: Honor Oak Road, Forest Hill, London, SE23 3SB
- Data Controller: Fairlawn Primary School

Data Protection Officer (DPO):

- Name: Stephen Williams, Head of Information Security and Governance (DPO)
- Email: schoolsdpa@lewisham.gov.uk
- Phone: 020 8314 6212 (ext. 46212)
- Postal: Chief Executive's Directorate, Lewisham Council, Laurence House, 1 Catford Rd, London SE6 4RU

✅ 3. Categories of Pupil Information Collected

We collect, hold, and process the following categories of personal data about pupils:

- Personal identifiers (name, unique pupil number, address, date of birth)
- Parent/carer contact details (names, addresses, phone numbers, emails)
- Characteristics (ethnicity, language, nationality, country of birth, free school meal eligibility)
- Emergency contact information
- Safeguarding information (e.g., special guardianship, court orders)
- Attendance (sessions attended, absences, reasons)
- Assessment and attainment (test results, teacher assessments, reports)
- Medical and dietary information, including accident records
- Special educational needs and disabilities (SEND) information
- Behaviour and exclusion records
- Post-16 learning information (where applicable)
- Photographs and video recordings for educational/safeguarding/consented promotional use
- ICT usage and device logs (e.g., internet/email usage, learning platforms)

🎯 4. Purposes for Collecting and Using Pupil Information

- Support learning and development
- Monitor and report on progress and attainment
- Provide pastoral care and safeguarding
- Assess the quality and effectiveness of educational services
- Administer admissions, attendance, and exclusions
- Manage medical and dietary needs
- Facilitate communication with parents/carers
- Comply with statutory obligations and regulatory reporting (e.g., school census)
- Ensure the health, safety, and welfare of pupils
- Manage school trips, activities, and events
- Provide access to digital learning platforms and resources
- Promote the school and celebrate achievements (with appropriate consent)

📜 5. Lawful Basis for Processing

We process personal data under one or more of the following lawful bases:

- Legal obligation – to comply with education, safeguarding and health legislation
- Public task – to perform tasks carried out in the public interest or in the exercise of official authority
- Vital interests – to protect the vital interests of pupils, particularly in emergencies
- Consent – for specific activities (e.g., use of images for promotional purposes)
- Contract – where processing is necessary for the performance of a contract

Special category data (e.g., health, ethnicity) is processed under Article 9 UK GDPR with additional safeguards. Criminal offence data is handled in accordance with the Data Protection Act 2018 and, where required, an Appropriate Policy Document.

ℹ️ 6. Collecting Pupil Information

- Most information is mandatory to fulfil statutory obligations
- Some information is provided voluntarily; we will make this clear at the point of collection
- Data may be collected from parents/carers, pupils, previous schools, local authorities, or other relevant agencies

📂 7. Storing Pupil Data (Security & Retention)

Records are held securely on electronic systems and in paper files with strict access controls. Data is retained in accordance with our Records Management & Retention Schedule (based on the IRMS Toolkit for Schools). Key retention periods include:

- Pupil educational record: until pupil leaves (primary) / Date of Birth + 25 years (secondary)
- Child protection/safeguarding file: Date of Birth + 25 years
- SEND file: Date of Birth + 25 years (or longer if litigation is possible)
- Accident/incident reports (pupils): Date of incident + 25 years
- Admissions register: retained as required by regulations; core entries kept permanently
- CCTV footage: typically 30 days (unless required for an investigation)

When data is no longer required, it is securely destroyed or anonymised.

👥 8. Sharing Pupil Information

We routinely share pupil information with:

- Destination schools/colleges (Common Transfer File)
- Local authority (e.g., London Borough of Lewisham)
- Department for Education (DfE) and its executive agencies
- Academy chains, federations and Multi Academy Trusts (MATs)
- NHS school nursing and relevant health services
- SEN and behaviour support services (where applicable)
- Approved suppliers (e.g., MIS, communications, payments, curriculum software, photography) under Article 28 contracts
- Police and Social Services (where legally required)
- UK Visas and Immigration/Home Office (where applicable)

We disclose only the minimum necessary information for the stated purpose and ensure appropriate safeguards are in place.

🤝 9. Reasons for Sharing

- Compliance with statutory duties and data collections (e.g., school census)
- Safeguarding and welfare of children
- Educational provision and transition support
- Health and safety management
- Regulatory and legal compliance

🗄️ 10. Data Collection Requirements (DfE)

For more information on statutory data collections, see:
https://www.gov.uk/education/data-collection-and-censuses-for-schools

🎓 11. Youth Support Services (13+ and 16+)

- Age 13+: Share limited data with youth support services under Education Act 1996 s.507B; parents may request only name, address and DOB be shared; right transfers to pupil at 16
- Age 16+: Share information with post-16 providers, youth support services and careers advisers

💾 12. National Pupil Database (NPD)

The NPD is managed by the DfE and contains information about pupils in England for research, policy and statistical purposes. For details see the DfE website, including the NPD user guide and data sharing processes.

📼 13. CCTV

- Used for safety and security purposes
- Footage retained for 28 days, then securely deleted unless required for an investigation
- Access restricted to authorised personnel only

⚖️ 14. Your Data Protection Rights

Under data protection legislation, parents/carers and pupils have the right to:

- Access their personal data (Subject Access Request)
- Rectify inaccurate or incomplete data
- Erase data (where applicable)
- Restrict or object to processing
- Data portability (where applicable)
- Object to automated decision-making and profiling
- Complain to the ICO: https://ico.org.uk/concerns/

Requests should be made to the DPO. We respond within one month (extendable for complex requests).

🌍 15. International Data Transfers

- Use of UK adequacy regulations where available
- UK International Data Transfer Agreement (IDTA) or Standard Contractual Clauses (SCCs) with the UK Addendum
- Transfer Risk Assessments completed before any transfer

🔒 16. Data Security and Breach Management

- Access controls and least-privilege permissions
- Encryption at rest and in transit
- Secure configuration, patching and vulnerability management
- Logging, monitoring and audit
- Physical security and secure disposal
- Staff training and awareness
- Report suspected breaches immediately; notify ICO within 72 hours where risk is likely; inform affected individuals where required

🗑️ 17. Data Retention and Disposal

- Retain only as long as necessary and proportionate to purpose
- Follow the Records Management & Retention Schedule (based on IRMS Toolkit for Schools)
- Securely delete or anonymise data when no longer required
- Maintain a log of routine destruction

📊 18. Monitoring, Audit and Review

- Periodic internal audits and spot checks
- Supplier and processor reviews
- Annual review of this notice or on significant change

☎️ 19. Contact

- DPO: Stephen Williams – schoolsdpo@lewisham.gov.uk – 020 8314 6212 (ext. 46212)
- School Address: Honor Oak Road, Forest Hill, London, SE23 3SB