

St Thomas à Becket Church of England Federation

**Blackboys C.E. School**  
School Lane  
Blackboys  
Uckfield  
East Sussex  
TN22 5LL



**Framfield C.E. School**  
The Street  
Framfield  
Uckfield  
East Sussex  
TN22 5NR

ADOPTED OCTOBER 2024

REVIEW OCTOBER 2025

# Privacy Notice (How we use pupil information)

*In our Church of England Federation, we take strength in collaboration, yet celebrate uniqueness. As schools, we may be small, but together we encourage children to be the best they can be so they are ready to make their mark on the world. We welcome the child yet embrace the whole family. We celebrate our rural environment yet aspire to look beyond our boundaries. We strive for knowledge and gratefully accept opportunities that come our way to enable us to live life in all its fullness. We all take a pride in our Federation as we follow in Jesus' example.*

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St Thomas à Becket Church of England Federation (Blackboys CEP School and Framfield CEP School) processes personal information about its pupils and is a 'data controller' for the purposes of Data Protection Legislation. We collect information from you and may receive information about your child from their previous school.

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

- Personal information (such as name, unique pupil number and address)
- Personal information about the child's parent/s or carer/s (such as name and contact details in order to contact you about your child)
- Characteristics (such as ethnicity, language and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons and any previous schools attended)
- Safeguarding information (such as court orders and professional involvement)
- Special Educational Needs (including the needs and ranking)
- Medical and administration (such as Doctors information, child health, dental health, allergies, medication and dietary requirements)
- Assessment and attainment (such as Key Stage 1 and Phonics results)
- Behavioural information (such as exclusions and any relevant alternative provision put in place)
- Images (such as photographs and videos)
- Historic information (e.g. images of major events) for the Federation's schools' archives.

**Why we collect and use this information**

The personal data collected is essential, for the Federation to fulfil its official functions and meet legal requirements.

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

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to keep pupils safe (food allergies, or emergency contact details)
- to assess the quality of our services
- to meet the statutory duties placed upon us
- to ensure pupils have appropriate access to healthcare
- to preserve the Federation's schools' history and collective memory.

**The lawful basis on which we use this information**

Under the UK General Data Protection Regulation (UK GDPR), the Federation is required to identify a valid lawful basis for each processing activity involving personal data. We only collect and use pupils' personal data when the law allows us to. Most commonly, we process it where:

- We have to collect and process personal data to enable us to comply with a legal obligation.

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- We need it because we are acting in the public interest or exercising our official authority.

We may also process pupils' personal data in situations where:

- We have obtained consent from you to use it in a certain way.
- We have a genuine and legitimate reason, and we are not harming any of your rights and interests.

As a Federation, we also collect and use Special Category Data, both to provide education and comply with our legal obligations. We have therefore identified additional lawful basis from Article 9 of the UK GDPR. Most commonly, we process Special Category Data where:

- We have gained explicit consent for the processing.
- Processing is necessary for reasons of substantial public interest.
- We are required to for reasons of "public health", for example during a pandemic.

Please see the Federation's Special Category Data Policy for more information about how we process this type of data. This Policy can be found on our School's websites. <https://www.framfieldcep.e-sussex.sch.uk/wp-content/uploads/2022/03/Special-Category-Data-Policy.pdf>

Where we keep records and information containing personal data for a longer time, we do this for archiving purposes in the public interest. We keep these records to preserve the Federation school's history, key events and collective memory. We will provide access to these records for research or statistical purposes, taking reasonable measures to protect the personal data they may contain.

### **How we collect pupil information**

We collect pupil information via:

- Admissions Documentation
- Annual Data Collection Sheet
- Registration Documents completed at the beginning of each School Year
- Common Transfer File (CTF)
- Secure File Transfer Documentation

Pupil data is essential for Federation schools' 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 the UK 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 data securely for the length of time outlined in the Federation's Retention Policy. The Federation's Records Management and Retention Policy is available by request at your school office.

We will keep a limited and reasonable amount of personal information for a longer time, where it appears in records that are of historic value or it is in the public interest to keep as part of the Federation school's history and collective memory. We store these records securely in our school archives for permanent preservation.

## **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)
- NHS and School Nurse Team
- Our local Diocese
- Traded Services purchased through the Local Authority (e.g. for Legal, Human Resources or Information Governance Support)
- Learning platforms or software providers used by Federation schools to support education provision.

We only share data with organisations who have adequate security measures and protections in place.

## **Why we regularly share pupil information**

We do not share information about our pupils 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 our local authority (LA) and the Department for Education (DfE) under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013. The LA may share limited information with the NHS to provide appropriate health care services.

All data is transferred securely and held by the DfE under a combination of software and hardware controls, which meet the current Government Security Policy Framework.

We may be required to share information about our pupils with the Local Authority to ensure that they can conduct their statutory duties under

- the Schools Admission Code, including conducting Fair Access Panels.

The Federation use third party Online Educational Learning Platforms to enhance learning opportunities. Limited information such as pupil name and educational year is shared to enable an account for each pupil to be created and activate a password Perseverance, Fellowship, Courage, Respect, Understanding, Thankfulness

for pupils to gain access to these Online Educational Learning Platforms both within Federation schools and at home.

In addition to these platforms, communication, school meals providers, first aid and safeguarding incident recording websites are used within the Federation schools.

Listed below are the main Online Educational Learning, Communication, Catering, Medical and Safeguarding platforms currently used by the Federation:

**ParentMail** is our chosen form of communication and parental engagement system. It is used to send emails and text messages to parents, distribute letters and collect electronic payments for school visits and other events.

For more information on ParentMail's GDPR compliance please visit: [www.parentmail.co.uk/gdpr](http://www.parentmail.co.uk/gdpr)

**Calendly** is used to enable parents/carers to book their parent/carer consultation meetings with their child's Teacher.

For more information on Calendly GDPR compliance please visit <https://calendly.com/privacy>.

**Cool Milk** supply milk to pupils at Framfield CEP School. To enable this to happen, a pupil's name, date of birth and class are shared with the company.

To read Cool Milk's GDPR statement [www.coolmilk.com/privacy-cookie-policy/](http://www.coolmilk.com/privacy-cookie-policy/).

**Chartwells** are part of the Compass Group and are the chosen hot school meals provider for the majority of schools in East Sussex. Infant age pupils automatically received hot school meals but in Key Stage 2, some pupil information is shared when parents sign up via the East Sussex Meal Selector.

To view the Compass Group privacy policy please visit <https://www.compass-group.co.uk/privacy-notice/>

**ParentPay** is an online payment system used by schools to manage payments for school meals, trips, and other expenses. It allows parents to make payments securely and conveniently from their computer or mobile device.

To view the ParentPay privacy policy please visit <https://www.parentpay.com/privacy-notice/>

**Purple Mash** is an in-school and home-based learning platform. Purple Mash is an award-winning cross-curricular website for nursery and primary school children. It enables children to explore and enhance their knowledge in a fun and creative way.

For more information on their GDPR compliance, including a link to their privacy notice, please visit: [2simple.com/gdpr](https://2simple.com/gdpr)

**Mathletics** is a captivating online learning space providing students with all the tools they need to be successful learners, both in the classroom and beyond. It supports and caters to each teacher's unique blend of student-driven learning and teacher-led instruction.

To View their GDPR policy click here [www.3plearning.com/privacy/](http://www.3plearning.com/privacy/)

**Times Tables Rockstars** is a programme of daily times tables practice used in Key Stage 2 to develop fluency. Each week concentrates on a different times table, with a recommended consolidation week for rehearsing the tables that have recently been practised every third week or so.

To view the Times Tables Rockstars GDPR Compliance Statement please visit: <https://mathscircle.com/privacy-notice/> and [https://mathscircle.com/uploads/Maths\\_Circle\\_GDPR\\_and\\_Data\\_Protection\\_FAQs.pdf](https://mathscircle.com/uploads/Maths_Circle_GDPR_and_Data_Protection_FAQs.pdf)

**Numbots** is a Key Stage 1 Maths Platform used by Blackboys CEP School to support Maths fluency through a little and often approach.

To view the Numbots GDPR Compliance Statement please visit: <https://mathscircle.com/privacy-notice/> and [https://mathscircle.com/uploads/Maths\\_Circle\\_GDPR\\_and\\_Data\\_Protection\\_FAQs.pdf](https://mathscircle.com/uploads/Maths_Circle_GDPR_and_Data_Protection_FAQs.pdf)

**Spelling Shed** is an on-line whole-school spelling scheme which sets out a weekly focus with word lists and activities. The system makes relevant word lists available with deadlines for completion to assist pupils with spelling. In addition, pupils are able to play games together as a whole class.

To view Spelling Shed's GDPR Privacy Notice visit: <https://www.edshed.com/privacy.html>.

**Superhero Spelling** is an online portal providing spelling lessons for our junior year groups.

To view Superhero Spelling's Privacy Notice visit:  
<https://superherospelling.com/privacy-policy/>

**Monster Phonics** is an online synthetic phonics teaching approach used mainly by the infant classes. Assessment data is held on the site to help teachers monitor children's progress.

To view Monster Phonic's Privacy Policy visit: <https://monsterphonics.com/privacy-policy/>

**Lexia® Core5® Reading** is a research-proven program that accelerates the development of literacy skills for students of all abilities, helping them make the critical shift from learning to read to reading to learn.

To view Lexia's Privacy Policy visit: <https://www.lexialearning.com/website-privacy-policy>

**Medical Tracker** is a medical management and first aid software for schools. It is used by Framfield CEP to manage and record first aid incidents.

To view Medical Tracker's Privacy Policy visit:  
<https://www.medicaltracker.co.uk/privacy/>

**MyConcern** is an online portal system for recording and tracking safeguarding concerns. MyConcern can restrict access so that only designated staff see information that is relevant to them. Access to the data held on MyConcern will be controlled by username and password. The platform will be used internally only from devices based within the school. Access to the platform can be revoked at any time.

### **Requesting access to your personal data**

Under Data Protection Legislation, parents and pupils 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 record, please contact your School Office.

Depending on the lawful basis above, you may also have the right to:

- be informed about the collection and use of your personal data
- ask us for access to information about you that we hold

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- request for your personal data to be rectified, if it is inaccurate or incomplete
- request the deletion or removal of your personal data where there is no compelling reason for its continued processing
- object to processing of personal data that is likely to cause, or is causing, damage or distress
- request we restrict the processing of your personal data (i.e. permitting its storage but no further processing)
- object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics.
- not be subject to decisions based purely on automated processing where it produces legal or similarly significant effect on you.
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- a right to seek redress, either through the ICO, or through the courts.

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:

- the right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- the right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- the 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, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

### **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 your School Office.

### **Data Protection Officer**

Peter Questier (East Sussex County Council, Information Governance Team. Children's Services)

However, please contact your school in the first instance if you have a query regarding this Privacy Notice or how your information is used.



## **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 information about our pupils from the NPD with certain third parties including:

- schools and local authorities
- researchers
- organisations connected with promoting the education or well-being 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 the Home Office and the Police please visit the following website: <https://www.gov.uk/government/publications/dfe-external-data-shares>.

## **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).

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- monitors pupil progress, admissions and attendance. As of August 2024, attendance data is collected by the DfE from schools on a daily basis, this is a statutory requirement under The School Attendance (Pupil Registration) (England) Regulations 2024. Child level data will be shared back with the school, and either the Local Authority or Academy Trust responsible for the school. This sharing is to help them identify any potential issues with attendance and if needed, enable timely support to help children stay in 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/data-collection-and-censuses-for-schools>

### **How to find out what personal information DfE hold about you**

Under the terms of the Data Protection Act 2018, you're 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 the department: <https://www.gov.uk/contact-dfe>