LIGHTHOUSE SCHOOLS PARTNERSHIP

Fishponds CE Primary School
Privacy Notice for Pupils and Parents

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About this Privacy Notice

Fishponds CE Primary School is part of Lighthouse Schools Partnership and is covered by the Trust's Data Protection Policy.

Individuals have a legal right to be informed about how we use their personal information. This Privacy Notice explains how we collect, store and use personal information. It is intended for pupils and parents (including carers or guardians who we refer to in this privacy notice as 'parents') and we encourage all to read it. We have produced a separate privacy notice for the school's workforce **and a shorter, simpler notice for pupils themselves.**

Our aim is to always provide clear information about the personal information we are using and why we are using it. We have tried to keep the language in this privacy notice as simple as possible, however if anything is unclear or if you have any concerns then please contact the school office on 0117 903 0491.

This is the school's main 'overarching' Privacy Notice, and it applies generally to the personal information that we collect and use. It is based on the model privacy notice produced for schools by the Department for Education (DfE). Unless there is a lawful reason not to do so, we will also provide more specific privacy information at the point at which we collect or use personal information, for example if we collect personal data via an online or paper form.

Whilst much of the personal information that we collect is mandatory (i.e. it must be provided so that we can manage the school, fulfil our legal obligations and provide an education), some of it is requested on a voluntary basis. Where this is the case, we will request consent at the point we collect the information. We will explain to you whether there is a requirement to provide certain information to us, or whether you have a choice in doing so.

For the purposes of data protection law, Lighthouse Schools Partnership is the 'data controller'. **Our Data Protection Officer is One West**; contact details are provided at the end of this privacy notice.

The personal data we hold (categories of personal data)

We process personal information to be able to run the school, to provide pupils with an education and to make sure that we can look after our pupils appropriately. We may collect information directly from pupils or parents or from other places including other schools, the local council and the Department for Education (DfE). Examples of the types of personal data that we may collect, use, store and share (when appropriate) are listed at **Appendix 1.**

Our lawful reasons for processing pupil/parent information (lawful bases)

Data Protection law requires us to have a lawful reason ('lawful basis') for processing the personal data we use. These reasons are listed under Article 6 of the 'General Data Protection Regulation' (GDPR). Our lawful basis for processing will be explained at the point at which we collect personal information unless there is a lawful reason not to do so (for example where it is for the prevention or detection of crime).

Fishponds CE Primary School processes a wide range of personal data for a variety of purposes, as described above. The lawful bases we rely on will therefore vary. However, generally, the lawful bases we mainly use in relation to pupils and parents are:

- **We need to comply with the law (we have a legal obligation):** for example, we collect and use pupil information under legal and statutory obligations within the Education Act 1996, The Children Act 2004; Education and Inspections Act 2006; Education Act 2011; the Family and Children Act 2014 and

Keeping Children Safe in Education (KCSIE).

- **We need to carry out a task in the public interest:** for example, the collection and use of pupil information is necessary for us to perform our role as a school and to deliver our public task of providing education to our pupils.
- **You have given us your consent** for example a photo of you for promotional purposes or our website.
- **We need to protect your vital interests (or someone else's interests)** this relates to life and death situations**.**
- **It is in ours or a third party's legitimate business interests to process the data** where this is the case, we will ensure that we have considered whether our legitimate interests are overridden by your rights and freedoms as the pupil or parent.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so. We will then cease this aspect of processing.

When a pupil is considered mentality capable of making their own decisions with regards consent (while there is no defined age, this is normally considered once a child attends Secondary school), their consent choices over-ride those made by the parent or guardian.

Some of the reasons that we use for collecting and using information may overlap and there may be several grounds allowing us to use personal data. There are also other lawful bases that may apply, and this will be made clear wherever possible.

Our lawful basis for processing will be explained at the point at which we collect personal information unless there is a lawful reason not to do so (for example where it is for the prevention or detection of crime).

Special category (sensitive) personal information

We may also collect, store, and use information about you that falls into "special categories" of more sensitive personal data which has extra protection in law and requires us to identify a condition for processing under Article 9 of the GDPR.

Special category data is personal data revealing:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric data for the purpose of uniquely identifying an individual (for example fingerprints)
- data concerning health; or
- data concerning an individual's sex life or sexual orientation

The Article 9 grounds which we may rely on to process special category data include:

- Legal obligation

- Substantial public interest including:
  - Statutory and government purposes
  - Equality of opportunity or treatment
  - Preventing and detecting unlawful acts
  - Preventing fraud
  - Public Health
  - Safeguarding
- Support for individuals with a particular disability or medical condition
- Explicit consent, for example to the use of biometric data, e.g. fingerprints.
- To maintain your vital interests

Please refer to our special category of data policy which forms part of our data protection policy for further information.

Criminal convictions

We may process data about criminal convictions or offences. This will usually be where such processing is necessary to carry out our obligations, to exercise our rights, to look after our students and staff or to support the police and other relevant agencies.

We will only use information about criminal convictions or offences where the law allows us to. Usually this will either be either on the basis of our legal obligations in relation to safeguarding, preventing fraud, health and safety or with your consent. We also need to identify the relevant condition for the processing, this will usually be substantial public interest.

Collecting pupil/parent information: Why do we collect and use your information?

The reasons that we collect and use personal information enable us to provide our pupils with an education and to help us run the school. Please refer to **Appendix 2** for examples.

We collect and use information about you in a variety of way including through the school application and admissions process, from correspondence with you and through assessing pupils' educational progress. The ways in which we collect information about you may also include methods as outlined at **Appendix 3**.

We may also collect information about you from third parties such as information from other schools or other third parties engaging with you outside the school.

Whom we share pupil information with

Information about pupils and parents will not be shared with any third party without consent, unless the law allows us to do so. Where it is legally required or necessary (and it complies with data protection law) personal information may be shared with the relevant local authority to meet our legal obligations to share information such as safeguarding concerns or with the Department for Education (DfE). To find out more about the data collection requirements that are placed upon us by the DfE including the data that we share with them go to: https://www.gov.uk/education/data-collection-and-censuses-for-schools. We do not use data for profiling, and only for marketing if you have opted in e.g. to our newsletter.

Further examples of with whom we share data are listed at **Appendix 4**. Details of how we share data with the

Department for Education can be seen in **Appendix 5**.

Third Party Processors

There are occasions when we contract or commission third party organisations or software systems to carry out functions on our behalf, and inevitably these functions will involve those third parties processing personal data on our behalf. Details of the Third Party Processors we use, including what data is processed and why can be found at **Appendix 6**.

Third Party Processors are acting on our behalf and under our instruction, governed by a contract that meets the requirements defined by GDPR.

Storing pupil and parent data

Personal data is stored in line with our data protection policy in a range of various places including within pupils' files and our IT systems including the school's email system.

The information that we create and maintain is kept secure. Once a pupil's education with us has ended, we may retain such information beyond their attendance at the school as deemed necessary and in line with our retention policies. A copy of the Retention Schedule can be found on the LSP website.

Transferring data internationally

Where we transfer personal data to a country or territory outside the UK and European Economic Area, we will do so in accordance with data protection law and ensure that we have sufficient safeguards in place.

Requesting access to your personal data

Individuals have the right to request access to information about them that we hold. This is known as making a 'Subject Access Request' (SAR). If you make a subject access request, and if we hold information about you, we will:

- 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 within a month, unless an extension is necessary on the ground of the complexity of the request

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances. If you would like to make a request, please contact the school office on 0117 903 0491.

Children have the same rights as adults over their personal data and the school will assess each request on its own merits. Pupils can find out what personal information we hold about them and how we use it by making a subject access request as long we judge that they can properly understand their rights and what this means.

Those with parental responsibility can make a request with respect to their child's data where the child is not

considered mature enough to understand their rights over their own data (mental capacity will be judged by the school on a case by case basis), or where the child has provided consent and it is considered to be in the best interests of the child. Parents also have the right to make a subject access request with respect to the personal data the school holds about themselves and an independent legal right to access their child's educational record. If you would like to make such a request, please contact the school office on 0117 903 0491.

Other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- To request to have personal data rectified if you believe that it is inaccurate or incomplete.
- To request the deletion or removal of personal data where there is no compelling reason for its continued processing.
- To restrict our processing of personal data (i.e. permitting its storage but no further processing) under certain circumstances.
- To object to processing if we are processing your information as part of our public tasks, or on the basis of our legitimate business interests, in which case we will consider your objection, and balance this against our need to process the information.
- To object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics.
- To withdraw your consent to processing
- To have personal information, which you have provided, transmitted electronically to another organisation in certain circumstances.
- Not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect - unless you have agreed or in other limited circumstances.
- A right to seek redress, either through the ICO, or through the courts

Contact and Complaints

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact the school office on 0117 903 0491.

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please contact the school office on 0117 903 0491 or our Data Protection Officer One West: i-west@bathnes.gov.uk or 01225 395959.

You can also complain to the Information Commissioner's Office if you are unhappy with how we have used your data, but they would generally expect you to have raised the issue with us first:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: https://www.ico.org.uk

Updates to our Privacy Notice

We may need to update this Privacy notice periodically. This version was last updated October 2025.

Appendix 1: Non- exhaustive list of examples of the types of personal data which we collect about pupils and parents

- Personal identifiers and contacts (such as name, unique pupil number, contact details and address).
- Characteristics (such as ethnicity, language, and free school meal eligibility).
- Safeguarding information (such as court orders and professional involvement).
- Special educational needs (including the needs and ranking).
- Medical conditions (such as doctor information, child health, dental health, allergies, medication and dietary requirements).
- Attendance record (such as sessions attended, number of absences, absence reasons and any previous schools attended).
- Test results, assessment and attainment (such as key stage 1 phonics results, key stage 2 results).
- Behavioural information (such as exclusions and any relevant alternative provision put in place).
- Photographs and CCTV
- Biometric data (such as fingerprints)
- We may use online platforms to deliver lessons remotely; if we intend to record the lesson we will let you know.

This list is not exhaustive. To access further details of the categories of personal information we process, please contact the school office on 0117 903 0491.

Appendix 2: Examples of the purposes for which we process your data

- To support pupil learning and deliver remote learning
- To monitor and report on pupil progress and check whether any extra help is needed.
- To look after pupil wellbeing.
- To keep track of how well we're performing and assess the quality of our services.
- To keep children safe (e.g. food allergies, or emergency contact details).
- To meet the statutory duties placed upon us e.g. for official data collections.
- To promote the school e.g. through our website, prospectuses and press releases.
- To manage payments for school meals or other activities
- To investigate incidents and/or complaints

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.

Although Lighthouse Schools Partnership is the Data Controller for this information, Fishponds CE Primary School is the main handler of your data. The trust, however, have access to all personal data the school processes. As in all cases, this access is restricted to only those with a requirement to see it, for example, IT Support, or to act as an independent investigator in accordance with our Complaints Policy.

Appendix 3: Ways in which we collect pupil and parent information

We collect and use information about you in a variety of way including through the school application and admissions process, from correspondence with you and through assessing pupils' educational progress. The ways in which we collect information about you may also include:

- Registration forms when starting at the school.
- Annual data collection forms to ensure correct data information.
- Common Transfer File from previous school.
- Opting in to use of school communications systems.
- Via Microsoft Forms or Letters when requesting permission for activities.
- Medication, Dietary, Allergy Forms.
- When signing up to use of systems such as ParentPay, School Photographer.

This list is not exhaustive.

Appendix 4: Examples of whom we may share your data with where the law permits (non – exhaustive list)

- The Local Authority (NSC)
- Schools that students attend after leaving.
- The Department for Education (DfE).
- The National Health Service to support student safety and vaccination programs.
- The pupil's family and representatives.
- Educators and examining bodies.
- The schools' inspector
- Suppliers and service providers so that they can provide a contracted service such as careers and Physical Education provision.
- Central and local government.
- Auditors.
- Survey and research organisations.
- Security organisations.
- Health and social welfare organisations.
- Professional advisers and consultants.
- Counsellors/Educational Psychologists as and when appropriate.
- Charities and voluntary organisations.
- Police forces, courts, tribunals.
- Professional bodies.
- Our Data Protection Officer on occasion, e.g. to support a subject access request
- Occasionally with another school in the Trust, with school governors or Trustees

Appendix 5: How we share information with the Department for Education (DfE) and the National Pupil Database (NPD)

Fishponds CE Primary School is required to provide information about pupils to the DfE as part of statutory data collections such as the school census. Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the DfE and provides evidence on school performance to inform research. The database is held electronically so it can be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The DfE may share information from the NPD with other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

Sharing by the DfE:
The law allows the DfE 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.

We lawfully share pupil data with the DfE through data collections which is used to

- underpin school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- inform 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).
- support 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

For more information about the DfE's NPD data sharing process, please visit: https://www.gov.uk/data-protection-how-we-collect-and-share-research-dataTo find out more about the data collection requirements placed on us by the DfE via the school census please visit: https://www.gov.uk/education/data-collection-and-censuses-for-schools

To find out more about the NPD, please visit: https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information

If you want to see the personal data held about you by the DfE, you can make a 'subject access request' to the DfE. Further information on how to do this can be found within the DfE'S personal information charter that is published here: https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter

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

Appendix 6: Third Party Processors we use *(this list is not exhaustive)*

Third Party Processor	Personal data captured	Purpose	Country the data is processed in	Who the information may be shared with and why
Microsoft Teams	Pupil full name, class, image and voice, personal comments and opinions	To provide a remote learning environment, collaboratively with whole class	Republic of Ireland	The pupil's family, as evidence of academic progress. The local authority if any expressed opinions were to be considered a safeguarding concern.
Microsoft Office 365	Subscription services of-fered by Microsoft which in-clude; Word, Excel, Power-Point, Outlook, SharePoint, OneDrive, OneNote. All of which could be used by an authorised user employed by LSP to communicate or store personal data.	Subscription services offered by Microsoft which include; Word, Excel, PowerPoint, Outlook, SharePoint, OneDrive, OneNote. All of which could be used by a authorised user employed by LSP to communicate or store personal data.	Washington, USA	The pupil's family, as evidence of academic progress. The local authority if any expressed opinions were to be considered a safeguarding concern.
CPOMS	CPOMS collects information from behaviour and attendance records, Special Educational Needs (SEN) records, Education Health Care Plans (EHCP), Safeguarding records and from other sources. CPOMS links into a school's Management information	Rather than schools/Trust's using entirely paper-based forms and processes, with records being retained in secure on site cabinets, CPOMS enables Lighthouse Partnership Schools (LSP) to improve their management of child protection and similar incidents and actions, whilst reducing staff time, paperwork and administration.	Skipton, United Kingdom	NHS/CAHMS, counselling, early help, speech and language therapists, health visitors, social workers, and details of outcomes. CPOMS contains electronic records of the work of the school in dealing with a suspected or actual safeguarding

	System drawing pupil data into the application.			issue and monitor progress and outcomes.
Neo People	Staff personal details required for payroll include; name, salary details (pay, employment start date, grade and number of hours employed) bank account details. Each member of staff has a unique payroll number.	Neo People is used for the payroll operation for staff employed by Lighthouse Schools Partnership	Bury, United Kingdom	Other than the HMRC and LGPS Pensions no one other than authorised personnel in each school and Neo People will receive this information.
MIS	Includes personal information of staff and pupils and their points of contact / next of kin details (e.g. parents/carers, etc). This personal information includes; attendance, attainment / performance, names, date of birth, address, contacts/next of kin (names, telephone numbers, addresses) medical, dietary needs and for staff only training records, contract information (role, salary, etc)	To hold and report on data to ensure progress against strategic goals for school performance as well as day to day operations – for example, contacting a parent of as pupil, recording the reasons for staff absence, etc.	London, United Kingdom	There are a number of reasons as to why information may be shared, such as; with outside agencies to assist with a safeguarding concern (e.g. police, social services, north somerset safeguarding team, etc.) or to assist police investigations. Parents/carers may receive data regarding their child's attainment and attendance. On site caterers would be provided with dietary requirements. Other schools would receive

				this information via an electronic transfer if a child changes the school they attend.
IMP	Includes personal information of staff including names, genders and salaries.	Budgeting and Forecasting software used by the central team and individual schools to monitor income and expenditure including payroll and prepare future forecasts.	United Kingdom	The reports generated do not contain the individual staff members confidential data. The reports are distributed to school governors and trustees to enable strategic planning. IMP staff have access to the data to enable them to provide the necessary support when required.
PSF	Includes personal information of any staff members that have claimed staff expenses and of individuals that a school or LSP has paid for services. This information includes their names, phone number, email address, home address and bank details.	Accounting software used to record financial transactions relating to the operation of our schools and used to hold information on our suppliers as well as the staff to which we have repaid expenses inline with financial accounting and reporting regulations.	London, England	The reports generated do not contain the individual staff members confidential data. The reports are distributed to school governors and trustees to enable strategic planning. PS Financials staff have access to the data to enable them to provide the necessary support when required.

ParentPay / SchoolGateway	Personal information of pupils and parents/carers including names, email addresses, phone numbers, addresses and bank details.	Data is required to allow for cashless income collection, allowing parents/carers to pay for school meals, clubs, trips and uniform remotely.	London, England	
Reward Gateway	Staff personal details include, name, address, email, contact telephone numbers and bank details.	An employee engagement platform that includes an area where staff can shop for discounts, usually by following a link to the chosen retailer, with the ordering process being done online through that retailer, or via the reward gateway platform itself - hence the reason for staff address and bank account details being held	Boston, USA	Information shared between Reward Gateway and the chosen retailer when purchases are made on the Reward Gateway platform.

School Mutual/School Wellbeing	Personal information obtained for Occupational Health Assessments include; name, date of birth, address, telephone numbers, email, medical and absence information.	Referrals can be made by a line manager via HR for Occupational Health assessments in order to obtain an opinion regarding a members of staffs fitness to work and in what capacity. They also offer an Employee Assistance Programmes (EAP) which are employee benefit programmes offered by many employers. EAP are intended to help employees deal with personal problems that might adversely impact their work performance, health and wellbeing. EAP generally include assessment, short-term counselling and referral services for employees and their immediate family - wherever they are in the world.	South Normanton/Peterborough, United Kingdom	Information maybe shared with other medical professionals, including counsellors and referral services.
Fisher Family Trust	Pupils names, date of births, attendance and attainment information.	To hold, track and analysis pupil attendance and attainment data to identify key in-school issues as well as pupil and subject groups, and predictive future analysis so that the best outcome for pupils can be achieved.	London, United Kingdom	The pupil's family, as evidence of academic progress. The local authority if any expressed opinions were to be considered a safeguarding concern.

Insight	Pupils from nursery age to year 6 - names, date of births, and attainment information.	To ascertain a pupils / classes/ years groups performance against the school's curriculum and spot issues. Set and record targets, interventions, and groups.	Hayle, Cornwall, United Kingdom	
Provision map	Pupils information - name, date of birth, medical / special education needs, funding received (pupil premium), and attainment information.	To reduce teacher / administration workload. To increase accessibility as records online. To manage SEND & Pupil Premium students, including recording provisions and interventions and their effectiveness.	Fishguard, Pembrokeshire, United Kingdom	The pupil's family, as evidence of academic progress. The local authority if any expressed opinions were to be considered a safeguarding concern.
Catering Company - Aspens	Pupils information - name, date of birth, medical and dietary needs, free school meals (if eligible), Parent/carer bank account details, name, address.	To ensure correct meals are given and charged accordingly and for parents/carers to be able to pay for meals in advance.	Worcester, United Kingdom	
Alarm Monitoring Company	Staff names and contact telephone numbers.	Nominated staff keyholders in case of out of hours emergencies at schools		Emergency Services, if requested.
School Photographer	Pupils name, date of birth and parent/carer address and email address.	To take professional photographs of school children to sale to parents/carers		