



# PRIVACY NOTICE

This Privacy Notice explains how we collect, use, store, and share information while ensuring transparency and security.

March 2025



[office@feniscowles.blackburn.sch.uk](mailto:office@feniscowles.blackburn.sch.uk)

[www.feniscowlesprimary.com](http://www.feniscowlesprimary.com)



## The Categories of Pupil Information That We Collect, Hold, and Share

We collect, process, and store the following categories of pupil information:

- **Personal information** (such as name, unique pupil number, and address)
- **Characteristics** (such as ethnicity, language, nationality, and free school meal eligibility)
- **Attendance information** (sessions attended, absences, and absence reasons)
- **Assessment information**
- **Medical information**
- **Special Educational Needs (SEN) information**
- **Exclusion and behavioural records**

## Why We Collect and Use This Information

We process pupil data for the following purposes:

- To support pupil learning
- To monitor and report on pupil progress
- To provide appropriate pastoral care
- To assess and improve the quality of our services
- To comply with legal obligations regarding data sharing
- To collate and summarise professional reports to assist in intervention planning and targeted support
- To support teachers with access to wider strategies that enhance individualized learning approaches
- To support administrative functions, including AI-assisted data analysis
- To promote the school and pupils' achievements via social media (with consent)

## Use of Artificial Intelligence (AI) in Data Processing

### Why We Use AI in School Operations

Feniscowles Primary School may use Artificial Intelligence (AI) to assist with administrative and educational processes in a way that improves efficiency and enhances learning outcomes. AI may be applied in areas such as:

- **Data Analysis and Reporting** – Summarising school-held data to assist in pupil progress tracking, attendance monitoring, and attainment analysis.
- **Safeguarding and Well-being Monitoring** – Identifying trends in behaviour logs, attendance records, and pastoral concerns to support pupil welfare.
- **Collation and Summarisation of Professional Reports** – AI may assist in collating and summarising reports from external professionals (e.g., educational psychologists, speech and language therapists, and SEN specialists) to create targeted action plans for pupils.
- **Supporting Individualized Learning Approaches** – AI can provide teachers with quick access to research-backed strategies tailored to pupils' specific needs, supporting differentiation and intervention.
- **Curriculum and Learning Support** – Analysing assessment trends to provide insights that support teaching and intervention planning.
- **Administrative Efficiency** – Assisting in document collation, timetable planning, and summarising policies and guidance.

**AI does not replace human decision-making**—all AI-generated reports or insights are reviewed by school staff before any action is taken.

## How AI Processes Pupil Data

- AI may process personal data already held by the school but will not collect new data beyond the school's existing records.
- AI does not make automated decisions about pupils, nor does it influence individual pupil outcomes.
- AI does not train itself on personal data, ensuring all processing remains within school systems.
- Processed data is deleted immediately after the task is completed, unless retention is required under the school's standard policies.

## The Lawful Basis on Which We Use Pupil Information

We collect and use pupil information under **Article 6(1) of the UK GDPR**, which allows processing when it is:

- **(a) Consent** – The individual has given clear consent.
- **(c) Legal obligation** – The processing is necessary to comply with the law.
- **(d) Vital interests** – The processing is necessary to protect someone's life.
- **(e) Public task** – The processing is necessary for an official function with a legal basis.
- **(f) Legitimate interests** – The processing is necessary unless overridden by data protection concerns.

When processing special category data, we comply with Article 9(2) of the GDPR by identifying an additional legal basis.

## Storing Pupil Data & Retention

We hold pupil data only for as long as necessary under the School's Data Retention Schedule, which follows the IRMS Information Management Toolkit for Schools. Retention periods include:

- **Attendance records:** Retained for 3 years.
- **Assessment data:** Retained for the pupil's time at the school + 1 year.
- **SEN records:** Retained until the pupil is 25 years old.
- **Safeguarding records:** Retained until the pupil is 25 years old.
- **AI-processed data:** Deleted immediately unless required under standard retention rules.

A full retention schedule is available on request from the Data Protection Officer (DPO).

## Security Measures for Protecting Pupil Data

Fenisowles Primary School follows strict security protocols to protect pupil data, including:

- **Access Controls:** Only authorised staff can access pupil data based on job role.
- **Secure Storage:**
  - Paper records containing personal data are kept in locked cabinets.
  - Digital records are stored on secure school servers.
- **Secure Data Transfer:** Any sharing of data is conducted using secure email encryption, VPNs, or secure portals.
- **Data Breach Response:** In case of a breach, the school follows ICO-compliant procedures, including immediate investigation and reporting where necessary.
- **AI-Specific Security:**
  - AI tools do not retain personal data beyond task execution.
  - All AI usage is monitored and approved by the Headteacher to ensure compliance.
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Staff receive regular data protection training to maintain security and compliance.

## Who We Share Pupil Information With

We routinely share pupil information with:

- **The schools that pupils transfer to after leaving us**
- **The Local Authority (LA)**
- **The Department for Education (DfE)**
- **The National Health Service (NHS)**
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We only share data where legally required or with consent.

## Why We Share Pupil Information

We do not share pupil information with anyone unless:

- We have parental consent
- We are required to share it by law
- It is necessary for the public interest (e.g., safeguarding or educational research)

We share pupil data with the Department for Education (DfE) on a statutory basis, supporting school funding and educational performance monitoring.

## The National Pupil Database (NPD)

Pupil data is provided to the NPD, a secure database managed by the DfE for research and analysis purposes. For more information, visit:

 [National Pupil Database User Guide](#)

For details on data sharing and security, visit:

 [Data Protection and Research at DfE](#)

## Requesting Access to Personal Data (Subject Access Requests - SARs)

Under UK GDPR, parents and pupils have the right to:

- Request access to their personal data
- Correct inaccurate data
- Request data erasure (where applicable)
- Object to data processing
- Restrict processing in certain circumstances
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## How to Make a Request

Requests should be made in writing to:

 **Email:** office@feniscowles.blackburn.sch.uk

 **Address:** Feniscowles Primary School, Blackburn, BB2 5EG

We will respond within one month of receiving a valid request. Proof of identity may be required.

If you have concerns about how we process your data, you can contact the Information Commissioner's Office (ICO):

 [ICO Website](#)

## Contact for Data Protection Queries

 **Email:** Schools.IG@blackburn.gov.uk

 **Lee Gardiner, Schools Data Protection Officer**