



# Privacy Notice for Parents and Pupils

Document date: March 2024



*Together, pursuing life in all its fullness*

<b>Version</b>	<b>Date</b>	<b>Author</b>	<b>Changes</b>
V2.0	March 2020	Peter Blenkinsopp	Updated to consolidate as one document for parents and pupils
V2.1	February 2022	Peter Blenkinsopp / Louise Beale	Reviewed and updated registered office address. Minor changes.
V3	March 2024	School to TLC / Louise Beale	Update to School Pro template and review

<b>Review frequency</b>	2 years
<b>Review date</b>	March 2024
<b>Ratified by</b>	Trust Leadership Team
<b>Date of ratification</b>	4 <sup>th</sup> March 2024
<b>Lead/owner</b>	Head of Operation and Compliance
<b>Target audience</b>	Parents and Pupils
<b>Document reference</b>	POL-DP08

The electronic version is the definitive version of this document.

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## **1.0 Introduction**

This Privacy Notice explains how and why we store personal information about pupils and parents/carers. It provides a guide to parents/carers about our legal obligations and their own rights. Like any organisation which handles personal data, our Trust is defined as a 'Data Controller' and, as such, we are registered with the ICO (Information Commissioner's Office) and we comply with the Data Protection Act and UK General Data Protection Regulation (UK GDPR). Our ICO registration number is ZA000718.

## **2.0 Categories of Pupil Information That We Process**

The Categories of Pupil Information That We Process Include:

For all pupils	Personal Information	Name, date of birth, gender, year group, class, address, contacts Dietary needs, dietary preferences Medical practice address and telephone number Medical conditions
	Characteristics	Ethnicity, language, nationality, country of birth
	Attendance Information	Sessions attended, number of absences, reason for absence
	Academic Attainment and progress records	Teacher assessment grades Statutory assessment results Standardised score results Learning journey evidence (photographs and annotations) Other photographic evidence of learning Reports to parents
	Other	Pupil surveys incidental evidence of pupils' successes (certificates, photographs, names trophies, celebration events etc) Details of previous or future schools Unique pupil number
For some pupils if applicable	Other	Free school meals eligibility Other pupil premium eligibility (such as if the child is looked after) Court orders Safeguarding records (incidents, external agency reports) Special educational needs records (professional assessments, external professional reports, referrals for external support) Pastoral records (referrals for support both external and internal, notes of discussions with pupils, pupils' jottings of thoughts and feelings) Exclusion information Behaviour related records CCTV data (where installed)
All parents/carers*	Personal Information	Names, addresses, telephone and mobile numbers, email addresses, relationship marital status, relationship to the child (of parents/carers and other given contacts) Eligibility evidence for free school meals or other financial assistance
	Other	Parents' surveys Letters sent to school Emails sent to school Financial details (such as bank account or credit card details, details of payments, including debt (both manual and electronic))

### **3.0 Why We Collect and Use Pupil Information**

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

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

- To confirm a persons identity
- To communicate with pupils and/or parents/carers
- To support pupil learning and provide good educational support
- To keep everyone in the academy safe and secure
- Safeguarding pupils' welfare and providing appropriate pastoral (and where necessary medical) care
- To monitor and report on pupil progress
- To comply with the law regarding data sharing
- To meet the statutory duties placed upon us for DfE data collections
- To make sure everyone is treated fairly and equally
- To deal with emergencies involving pupils
- To celebrate pupil achievements
- To provide reports and additional information to parents
- To raise or address any concerns about safeguarding
- To provide or obtain additional services including advice and/or support for pupils and their families.
- Informing decisions such as the funding of schools
- Assessing performance and to set targets for schools
- To give and receive information and references about past, current and prospective pupils, and to provide references to potential employers of past pupils
- Managing internal policy and procedure
- Enabling pupils to take part in assessments, to publish the results of examinations and to record pupil achievements
- To carry out statistical analysis for diversity purposes
- Legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care
- Enabling the relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate
- Monitoring the use of the school's IT and communication systems in accordance with the Trust's IT policies and procedures
- Making use of photographic images in school publications, on the school website and on social media channels
- Security purposes, including CCTV at some academies

We use the parents' data:

- To assess the quality of our services
- To comply with the law regarding data sharing
- To ensure financial stability
- To obtain funding for children or the academy
- To enable payments to be made by parents

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing pupil information are:

The lawful bases for processing personal data are set out in Article 6 of the UK General Data Protection Regulation. The school processed such data because we have:

(6a) Consent: parents have given clear consent for us to process their (and their child's) personal data for the purposes indicated above.

(6c) A Legal obligation: the processing is necessary for us to comply with the law (e.g. we are required by law to submit certain teacher assessment information and to safeguard pupils' welfare by sharing information with other agencies).

(6d) A duty to safeguard pupils: the processing is necessary in order to protect the vital interests of the data subject (children); (e.g. if we are required to share medical history information with emergency services in the event of an accident or to other agencies when a child may be in danger).

(6e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law (e.g. processing attendance information or academic attainment and progress records).

Special Categories of data are set out in Article 9 of the UK General Data Protection Regulation. The school processes such data because we have:

(9.2a) explicit consent. In circumstances where we seek consent, we make sure that the consent is unambiguous and for one or more specified purposes, is given by an affirmative action and is recorded as the condition for processing. Examples of our processing include use of pupil photographs for external purposes, pupil dietary requirements, and health information we receive from our pupils who require a reasonable adjustment to access our services.

(9.2b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.

(9.2c) where processing is necessary to protect the vital interests of the data subject or of another natural person. An example of our processing would be using health information about a pupil in a medical emergency.

(9.2f) for the establishment, exercise or defence of legal claims. Examples of our processing include processing relating to any employment tribunal or other litigation.

(9.2g) reasons of substantial public interest. As a school, we are a publicly funded body and provide a safeguarding role to young and vulnerable people. Our processing of personal data in this context is for the purposes of substantial public interest and is necessary for the carrying out of our role. Examples of our processing include the information we seek or receive as part of investigating an allegation.

(9.2j) for archiving purposes in the public interest. The relevant purpose we rely on is Schedule 1 Part 1 paragraph 4 – archiving. An example of our processing is the transfers we make to the County Archives as set out in our Records Management Policy.

We process criminal offence data under Article 10 of the UK GDPR.

Our Data Protection Policy highlights the conditions for processing in Schedule 1 of the Data Protection Act 2018 that we process Special Category and Criminal Offence data under.

#### **4.0 How We Collect Pupil Information**

We collect pupil information via registration forms at the start of the school year or Common Transfer File (CTF) or secure file transfer from the previous setting, when we periodically check this data, and when parents/carers notify us that information has changed.

We will collect CCTV data when an individual attends a Trust site and are captured by a CCTV system if installed and used at the Academy.

We may also obtain pupil information from other sources. This might include information from the local authorities, other professionals or external organisations such as courts.

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it requested on a voluntary basis. In order to comply with the 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.

#### **5.0 How We Store Pupil Data**

We hold pupil data securely for the set amount of time shown in our Data Retention Schedule. For more information on our Data Retention Schedule and how we keep your data safe see our Data Protection Policy and our IT and Information Security Policy available from our website [here](#).

All confidential information is kept secure either on encrypted, password protected devices or paper copies kept on the academy site. Once the deadline for retaining information has passed, data kept electronically is deleted and paper copies are destroyed in conjunction with the retention schedule.

#### **6.0 Who We Share Pupil Information With**

We routinely share pupil information with:

- Other schools or educational institutions a pupil may attend or require support from
- Schools that the pupil attends after leaving us
- Our local authorities, Warwickshire County Council or Coventry City Council depending on the location of the academy
- The Department for Education (DfE) and Educations and Skills Funding Agency (ESFA) and Standards and Testing Agency (STA)
- Children's Social Care (when safeguarding pupils' welfare)
- External professionals who visit school (such as Educational Psychologists or specialist tutors)
- Law enforcement officials such as the police
- The NHS and School Nurse service providers
- Suppliers and service providers with whom we have a contract (such as school caterers, payment service providers, IT support and providers, software providers such as for communication tools or provision of educational sessions)
- Voluntary organisations linked to the school

Information will be provided to those agencies securely or anonymised where possible.

The recipient of the information will be bound by confidentiality obligations – we require them to respect the security of your data and to treat it in accordance with relevant legislation.

## **6.1 Why We Regularly Share Pupil Information**

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

### **6.1.1 Youth Support Services – Pupils Aged 13+**

Once our pupils reach the age of 13, we also pass pupil information to our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- youth support services
- careers advisers

The information shared is limited to the child's name, address and date of birth. However where a parent or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the child / pupil once they reach the age 16.

### **6.1.2 Department for Education (DfE)**

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 the Department for Education (DfE) either directly or via our local authority for the purpose of those data collections, under: regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

All data is transferred securely and held by DfE under a combination of software and hardware controls, which meet the current [government security policy framework](#). For more information, please see 'How Government uses your data' section.

### **6.1.3 Local Authorities**

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.

### **6.1.4 Standards and Testing Agency**

We are required to share data with the [Standards and Testing Agency](#) under the Key Stage 1 and Key Stage 2 assessment and reporting arrangements (ARA). This is a statutory requirement and sharing is done under legal obligation and public task lawful bases. For general enquiries about the assessment and reporting arrangements, contact the national curriculum assessments helpline on 0300 303 3013 or email [assessments@education.gov.uk](mailto:assessments@education.gov.uk).

## **7.0 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, contact the academy office.

Depending on the lawful basis used for processing data (as identified above), you may also have the right to:

- have your personal data rectified if it is inaccurate or incomplete;
- request the deletion or removal of personal data where there is no compelling reason for its continued processing;
- restrict our 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; or
- not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance. Alternatively, you can contact our Data Protection Officer, see the contact section below. You can also contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

For further information on how to request access to personal information held centrally by DfE, please see the 'How Government uses your data' section of this notice.

## **8.0 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 the academy office.

## **9.0 Last Updated**

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time.

## **10.0 Contact**

If you would like to discuss anything in this privacy notice, please contact the school office in the first instance or the Data Protection Officer:

The Data Protection Officer  
The Diocese of Coventry Multi Academy Trust  
c/o St James CofE Academy  
Barbridge Road, Bulkington  
Bedworth, CV12 9PF  
Tel: 01788 422900  
[dpo@covmat.org](mailto:dpo@covmat.org)

## **Appendix 1 - How Government Uses Your Data**

The pupil data that we lawfully share with the Department for Education (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)

### **Data Collection Requirements**

To find out more about the data collection requirements placed on us by the Department for Education (DfE) (for example; via the 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 (DfE) 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 for Education (DfE).

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-mpd-privacy-notice/national-pupil-database-mpd-privacy-notice>

### **Sharing by the Department for Education (DfE)**

The law allows the Department for Education (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

For more information about the Department for Education's (DfE) 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 the Department for Education (DfE) to request access to individual level information relevant to detecting that crime.

For information about which organisations the Department for Education (DfE) 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 the Department for Education (DfE) Hold About You**

Under the terms of the Data Protection Act 2018, you are entitled to ask the Department for Education (DfE):

- 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 for Education (DfE), you should make a 'subject access request'. Further information on how to do this can be found within the Department for Education's (DfE) 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>