

# Privacy notice for pupils and their families

#### 1. Introduction

1.1. Information (or 'data') about you is valuable and needs to be protected to ensure it doesn't end up with someone who might exploit their access to your information. You can expect the Trust to protect your data and this document sets out how we do that and what rights you have in respect of information we hold about you.

### 2. What categories of information are processed?

- 2.1. The categories of personal information that we process include the following:
  - Personal identifiers and contacts e.g. name, unique pupil number, contact details and address;
  - Characteristics e.g. ethnicity, language and eligibility for free school meals;
  - **Safeguarding information** e.g. court orders and professional involvement;
  - Special educational needs and disabilities (SEND) information e.g. any needs you have;
  - **Medical and administration** e.g. doctors' information, your health, allergies, medication and dietary requirements;
  - **Attendance** e.g. sessions attended, number of absences, reasons for absences and any previous schools you have attended;
  - Assessment and attainment e.g. any relevant test and exam results;
  - **Behavioural information** e.g. exclusions and any relevant alternative provision put in place.

#### 3. Why do we collect and use your information?

- 3.1. We collect and use your information for the following reasons:
  - To support pupil learning;
  - To monitor and report on pupil attainment and progress;
  - To provide appropriate pastoral care;
  - To assess the quality of our services;
  - To keep pupils safe;
  - To meet legal duties placed on us by the government.
- 3.2. The legal basis/bases we rely on for processing personal information for general purposes are:
  - For the purpose of supporting pupil learning, paragraph 2 (g) of Article 9 and Section 537A of the Education Act 1996.

#### 4. How do we collect your information?

- 4.1. We collect your personal information via the following methods:
  - Admission forms;
  - Admissions Transfer File (ATF) from your previous school;
  - Child protection plans.

4.2. Whilst the majority of information you provide to us is mandatory, some of it is requested on a voluntary basis. We will inform you at the point of collection whether you are required to provide certain information to us or if you have a choice.

## 5. How do we store your information?

- 5.1. We hold your personal information securely for the set amount of time shown in the school's Records Management Policy, which can be found on the Trust's website.
- 5.2. For more information about how we keep your information safe, please see The Corinium Education Trust's Data Protection Policy.

# 6. Who do we share your information with?

- 6.1. We routinely share your information with:
  - The Local Education Authority (LA);
  - The Department for Education (DfE);
  - Schools that you go to after leaving us;
  - Youth support services (only applicable to pupils aged 13 or over).

#### 7. Why do we share your information?

- 7.1. In some circumstances we share information about you with other organisations. Sometimes this is because we are required by law to do so, sometimes it is to ensure that you get the best education and sometimes we will ask for your (or your parent's) permission to do so.
- 7.2. We do not share information about you with anyone without your consent, unless the law and our policies allow us to do so.

#### 8. Youth support services

- 8.1. Once our pupils reach the age of 13, we also pass pupil information to our local authority (LA) and/or provider of youth support services because they have responsibilities in relation to the education or training of 13 to 19 year-olds under section 507B of the Education Act 1996.
- 8.2. Sharing this information allows them to provide the following services:
  - Youth support services:
  - Careers advisers.
- 8.3. The information we share is limited to the pupil's name, address and date of birth; however, where a parent has provided their consent, other relevant information will be shared this right to consent is transferred to pupils once they reach 16 years old.
- 8.4. We securely transfer information to the youth support services. The youth support services store and retain this information in line with their policies.

#### 9. Department for Education (DfE)

9.1. The DfE collects personal information from us through various collections the school is legally required to undertake. We are required to share information about pupils with the DfE either directly or via our LA for the purpose of those data collections, under Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

- 9.2. All information we share with the DfE is transferred securely and held by the DfE under a combination of software and hardware controls which meet the current <a href="https://www.gov.uk/government/publications/security-policy-framework/hmg-
- 9.3. The information you supply is used by the Learning Records Service (LRS). The LRS issues Unique Learner Numbers (ULN) and creates Personal Learning records across England, Wales and Northern Ireland, and is operated by the Education and Skills Funding Agency, an executive agency of the DfE. For more information about how your information is processed, and to access your Personal Learning Record, please refer to: <a href="https://www.gov.uk/government/publications/lrs-privacy-notices">https://www.gov.uk/government/publications/lrs-privacy-notices</a>

# 10. How does the government use your data?

- 10.1. The National Pupil Database (NPD) is owned and managed by the DfE and contains information about pupils in schools in England it provides evidence on educational performance to inform independent research as well as studies commissioned by the DfE.
- 10.2. Information on the NPD is held in an electronic format and it is securely collected from a range of sources, including schools, LAs and awarding bodies.
- 10.3. You can find out more about the NPD by following this link: <a href="https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information">https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information</a>.
- 10.4. The DfE is legally allowed to share pupils' personal information with certain third parties, including the following:
  - Schools:
  - LAs:
  - Researchers;
  - Organisations connected with promoting the education or wellbeing of pupils;
  - Other government departments and agencies:
  - Organisations fighting or identifying crime.
- 10.5. Organisations fighting or identifying crime, such as the Home Office and the police, may use their legal powers to contact the DfE to request access to individual level information relating to a crime. The DfE typically supplies information on around 600 pupils per year to the Home Office and approximately one per year to the police.
- 10.6. For more information about how the DfE collects and shares pupil information, you can look at the information in the following two links:
  - <a href="https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data">https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data</a>
  - https://www.gov.uk/government/publications/dfe-external-data-shares

#### 11. How to find out what personal information the DfE holds about you

- 11.1. Under the Data Protection Act 2018, you are entitled to ask the DfE what personal information it holds about you. You have the right to ask the DfE:
  - If it processes your personal data;
  - For a description of the data it holds about you;
  - The reasons it is holding your data and any recipient it may be disclosed to;
  - For a copy of your personal data and any details of its source.

- 11.2. To exercise these rights, you should make a subject access request. Information on how to do this can be found by following this link:

  <a href="https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter">https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter</a>
- 11.3. You can also contact the DfE directly using its online contact form by following this link: https://www.gov.uk/contact-dfe

## 12. What are your rights?

- 12.1. You have specific rights to the processing of your data, these are the right to:
  - Request access to the information the school holds about you;
  - 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;
  - Have your personal data rectified if it is inaccurate or incomplete;
  - Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you;
  - Request the deletion or removal of personal data where there is no compelling reason for the continued processing;
  - Seek compensation, either through the Information Commissioner's Office (ICO) or the courts.
- 12.2. If you want to request access to the personal information that we hold about you, please contact our Data Protection Officer (DPO) on 01285 653447.
- 12.3. The Corinium Education Trust's Data Protection Officer is Tessa Rollings, Director of Finance and Operations.
- 12.4. If you are concerned about the way we are collecting or using your information, please raise your concern with The Corinium Education Trust's DPO in the first instance. You can also contact the Information Commissioner's Office (ICO) at https://ico.org.uk/concerns/.

#### 13. How to withdraw consent and lodge complaints

- 13.1. Where The Corinium Education Trust processes your personal data with your consent, you have the right to withdraw your consent.
- 13.2. If you change your mind or are unhappy with how The Corinium Education Trust uses your personal data, you should let us know by contacting the DPO, on 01285 653447.

# 14. How can you find out more information?

- 14.1. If you would like to discuss anything in this privacy notice, please contact the DPO on 01285 653447.
- 14.2. If you require further information about how we and/or the DfE store and use your personal data, please visit our website, the Gov.UK website <a href="https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data">https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data</a>, or download our Data Protection Policy and Records Management Policy.

# **Document History**

Creation Date November 2021

Trust Lead Director of Finance and Operations

Approved by Trustees

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Review frequency Annually

Review date	Significant amendments	Made by	Next review
Nov 2021	No changes made. Document history added.	AXT	Nov 2022
Nov 2022	References to school changed to The Corinium Education Trust. Acronyms expanded on first use. Paragraphs numbered. Changed name of DFO to Tessa Rollings. The role of the DFO is to be reviewed in 2022-23.	СХН	Nov 2023