

Privacy Notice for Pupils and their Families

Privacy notice – how the school uses pupil information

What categories of information are processed?

The categories of personal information that we process include but are not limited to 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** – including the needs and ranking
- **Medical and administration** – e.g. doctors' information, general health, dental 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
- **Parent details** – names/contact information/address/relationship to pupil etc.

Why do we collect and use your information?

We will only collect your information when we have a good reason to do so in line with the law – this is known as having a lawful basis to use data. Here are the reasons we collect your information:

- 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 the statutory duties placed on us for government data collections

Lawful Basis for Processing

We collect and use personal data in accordance with legal requirements and legitimate interests set out in the GDPR and UK law, including those in relation to the following:

- Articles 6 and 9 of the GDPR
- The Education Act 1996

- Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013

We also process information where:

- 1) the data subject has given consent for one or more specific purposes
- 2) processing is necessary in order to protect the vital interests of the data subject or another natural person (medical information, for example).

When collecting data on a voluntary basis, the Academy will inform parents/carers whether they are required to provide this data or if consent is needed. Where consent is required, the Academy will provide specific and explicit information concerning the reasons the data is being collected and how the data will be used.

For the processing of any special categories of personal data (including racial or ethnic origin, religious or philosophical beliefs and the processing of health data, genetic or biometric data), specific conditions as stated in Article 9 (2) of the General Data Protections Regulations must also apply. These include:

- The data subject has given explicit consent to the processing of such personal data;
- Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;
- Processing is necessary for the purposes of preventative or occupational medicine and the provision of health care or treatment;
- Processing is necessary for the exercise or defence of legal claims.

Photographs and Film

Occasionally, the Trust may photograph or film pupils undertaking Academy activities. We may use the photographs or films either within or outside of Trust/Academy buildings. We would always seek consent for these purposes. Pupils will always be made aware if they are being photographed or filmed, what the purpose of this is and will be given the opportunity to object. Where the relevant consent has been obtained, photographs and films may be:

- used on displays, in presentations and in publications.
- used on websites and on social media sites which can be viewed throughout the world and not just in the United Kingdom where UK law applies.
- supplied to the media for use in newspapers and magazines and on TV, websites or social media sites.

How do we collect your information?

We collect your personal information via the following methods:

- Registration forms
- Common Transfer File (CTF) from your previous school
- Child protection plans
- Keystone Academy Trust attendance, safeguarding and behaviour management information systems

How do we store your information?

We hold your personal information securely for the set amount of time shown in Keystone Academy Trust's Records Management Policy.

For more information about how we keep your information safe, please see the Trust's Cyber Security Policy.

Who do we share your information with?

We routinely share your information with, but not limited to the following :

- The local authority (LA)
- The Department for Education (DfE)
- Schools that you go to after leaving us
- The NHS

Why do we share your information?

Keystone Academy Trust has a Data Sharing Agreement with Lincolnshire Local Authority through an automated and secure data exchange process. This is central to the success of integrated working across Trust Academies and the LA MIS systems, thus maintaining reliable and accurate pupil and school records.

We share information with other schools you attend and with the NHS to allow us to carry out our official functions in the public interest.

Department for Education (DfE)

The DfE collects personal information from us and our LA through various collections the school is required to undertake legally. 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.

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 government security policy framework,, which can be found by following this link:

<https://www.gov.uk/government/publications/security-policy-framework>

How does the government use your data?

The pupil data that we lawfully share with the DfE through data collections:

- Underpins school funding, which is calculated based upon numbers of pupils and their characteristics in each school.
- Informs 'short-term' education policy monitoring and school accountability and intervention.
- Supports 'longer-term' research and monitoring of educational policy, e.g. how certain subject choices go on to affect education or earnings beyond school.

To find out more about the data collection requirements placed on us by the DfE, e.g. via the school census, follow this link: <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 NPD.

The 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.

Information on the NPD is held in an electronic format for statistical purposes and it is securely collected from a range of sources, including schools, LAs and awarding bodies.

You can find out more about the NPD by following this link:

<https://www.gov.uk/government/publications/national-pupil-database-npd-privacy-notice/national-pupil-database-npd-privacy-notice>

Sharing by the DfE

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 children in England
- Other government departments and agencies
- Organisations fighting or identifying crime

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.

For more information about how the DfE collects and shares pupil information, you can look at the information in the following two links:

- <https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>
- <https://www.gov.uk/government/publications/dfe-external-data-shares>

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

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.

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

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

You can also contact the DfE directly using its online contact form by following this link:
<https://www.gov.uk/contact-dfe>.

What are your rights?

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 and/or 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.

If you want to request access to the personal information that we hold about you, please contact Joe Lee (DPO) on joe.lee@ark.me.uk.

If you are concerned about the way we are collecting or using your information, please raise your concern with the school's DPO in the first instance. You can also contact the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns>. The ICO is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

How to withdraw consent and lodge complaints

Where our school processes your personal data with your consent, you have the right to withdraw your consent.

If you change your mind or are unhappy with how our school uses your personal data, you should let us know by contacting the DPO, Joe Lee, on joe.lee@ark.me.uk.

Updating this privacy notice

We may need to update this privacy notice periodically if we change how we collect and process data. The school will inform you when this privacy notice has changed; however, we also recommend that you revisit this privacy notice periodically.

How can you find out more information?

If you would like to discuss anything in this privacy notice, please contact the DPO **Joe Lee** on joe.lee@ark.me.uk.

If you require further information about how we and/or the DfE store and use your personal data, please visit Keystone Academy Trust website and download our Data Protection Policy and Records Management Policy, or visit the Gov.UK website, (<https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>).