

Privacy Notice for Pupils and their Families

Privacy notice – how the school uses pupil information

What is a Privacy Notice?

The Data Protection Act 2018 (UKGDPR) gives everyone the right to be informed about how their information is used by organisations. This Privacy Notice explains how we use information about our pupils and their families. If you can be identified from the information we hold, then this is known as “personal data”.

This Privacy Notice explains:

- why we use your personal data
- the reasons we need to do this
- what kinds of personal data we use
- where we collect your personal data from
- who we will share your personal data with
- how you can find out more.

Who we are (Data Controller)

Keystone Academy Trust is the “Data Controller” of personal data. This means the trust is responsible for deciding how to use the personal information we hold about our pupils and their parent/carers.

The Chief Executive Officer (CEO) is responsible for data protection compliance on behalf of the trust.

Data Controller

Keystone Academy Trust

Westbourne Park, Bourne, Lincs. PE10 9QS

Website: www.keystoneacademytrust.org.uk

Data Protection Officer (DPO)

Joe Lee

Ark ICT Solutions

Email: dpo@ark.me.uk

Who processes your information?

We refer to information that identifies you as “personal data”. When we use your personal data in different ways, this is called “processing”. The Data Protection Act (2018) outlines how personal data should be protected and processed appropriately by organisations including schools.

All staff employed by the trust receive data protection training so that they understand how to use personal data appropriately.

We only share personal data where it is necessary to fulfil our duties as an education provider, comply with the law, or support the safe and effective operation of the school.

Where we wish to use or share information for a purpose that is not covered by these lawful bases, we will seek your consent.

The trust has a Data Protection Officer. Their role is to oversee and monitor our trust’s data protection procedures, and to ensure they are compliant with data protection legislation. The Data Protection Officer can be contacted by emailing dpo@ark.me.uk.

The categories of pupil information that we process include but are not limited to:

- 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)
- Images (such as photographs and CCTV images)
- Special educational needs (including the needs and ranking)
- Medical and administration (such as doctors’ information, child health, dental health, allergies, medication and dietary requirements)
- Attendance Information (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- Assessment and attainment (such as statutory Key Stage and teacher assessments)
- Behavioural information (such as incidents, interventions, exclusions and any relevant alternative provision put in place).

The categories of parent/family information we process include but are not limited to:

- Personal identifiers and contacts (such as name, address, phone numbers, email addresses, National Insurance number)
- Financial and meal management information, e.g. account and transactional information for school meals and eligibility for free school meals
- Information pertaining to home life where appropriate, e.g. where a pupil is identified as having a mental health issue or there are safeguarding concerns.

Why we collect and use your information

Most of the information we collect about pupils and their families is used to help perform our duties as a public authority. These include:

- To support pupil learning (onsite and remote)
- To monitor and report on pupil progress
- To provide appropriate pastoral care
- To keep pupils safe when learning online
- To assess the quality of our service
- To comply with the law regarding data sharing
- To keep children safe (safeguarding, health and safety of pupils)
- To meet the statutory duties placed upon us for the Department for Education (DfE) data collections.

Under the [UK General Data Protection Regulation \(UK GDPR\)](#), the lawful basis we rely on for processing pupil information for general purposes are:

- Article 6, 1, (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes
- Article 6, 1, (c) processing is necessary for compliance with a legal obligation to which the controller is subject.

The basis we rely on for processing pupil special category information for general purposes are:

- Article 9, 1, (a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject
- Article 9, 1, (b) 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 employment and 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.

We also collect and use personal data where it is necessary to meet the legal responsibilities set out in data protection legislation, other UK law and regulation that applies to schools. These include the following:

- Education Act 2011
- Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013
- Keeping Children Safe in Education regulations.

We may also need to share your personal data with other official bodies, agencies, or organisations where we are required to by other UK law or a recognised legitimate interest has been identified.

If we would like to use your information for another reason, then we will ask for your permission (consent) before doing so. When we ask for consent, we will explain what your information will be used for, by who and what choices you have about how it is used.

Collecting 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 previous school.

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it is 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.

Storing your data

Personal data relating to pupils and their families is stored in line with the trust's Records Management Policy and procedure. This policy is based on retention guidance published by the ICO and the DfE in their toolkits for schools and academies.

In accordance with the Data Protection Act, the trust does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected.

We will also retain personal data in the form of images, registers and examples of work for the purposes of archiving and as a historical record of school life. This information may later be published in school literature, displays or external media. In this case, the personal data we retain will be proportionate and limited to what is necessary.

From time to time, the school/trust may take photographs or video recordings of pupils as part of school life (for example, class activities, performances, trips, sports events and class photographs). Where we intend to use a pupil's image in publications or online (for example, newsletters, prospectuses, displays, the school/trust website or school/trust social media accounts), we will ask for parent/carer consent for the specific type of use and we will keep a record of that consent.

If consent is withdrawn, or when a pupil leaves the school, this will not affect images or videos that have already been used or shared for the purpose originally agreed (for example, an existing printed newsletter, a display board already on the wall, or a post already published). We will not create any new publications, new posts, or new uses using that image after consent is withdrawn or after the pupil has left, unless new consent is obtained.

Where it is reasonably practicable to do so, we will remove or update digital content (for example, a website page or social media post) so that the image is not used again for any new purpose.

Who we share information with

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

- Pupils' destinations upon leaving the school
- Local Authorities (Local Councils)
- The NHS (including the School Nursing Service, Speech and Language Therapists)
- Other agencies i.e. Social Care, Police, Public Health England
- The system we use for managing pupil welfare (CPOMS)
- The systems we use for active monitoring and filtering of online activities
- The systems we use to help manage school finance
- The cashless payments systems available to parents
- The systems and resources we use to help deliver the curriculum and maintain standards (including Microsoft Teams and online subject resources we have selected for use with our pupils)
- The systems we use to manage pupil information (Bromcom)

- The systems we use to help communicate with parents (e.g.: My Child at School)
- The providers of therapeutic and counselling support to our schools
- Meal providers (where applicable)
- The providers of extracurricular activities (e.g. trip providers and sports clubs)
- School photographers.

The information that we share with these parties includes the following:

- Personal information – names, addresses, dates of birth, gender, contact details
- Pupil assessments - end of Key Stage assessment and results
- Attendance Information - number of absences at school
- Relevant medical information
- Information relating to SEND
- Behavioural information – number of exclusions.

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 the Department for Education (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 below.

Making Choices About Your Personal Data (consent)

Where pupils or parents have given us consent to do so, we may send you messages by email or text promoting school events, campaigns, charitable causes or services that you might be interested in.

Where these messages are optional, you can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us as outlined below:

- For communications from the school, please use the school's enquiries email address.
- For communications from the trust centrally, please contact: enquiries@keystonemat.org

Use Of Your Personal Data in Automated Decision Making and Profiling

We don't currently put pupils' personal data through any automated decision making or profiling process. This means we don't make decisions about you using only computers without any human involvement.

If this changes in the future, we will update this notice in order to explain the processing to you, including your right to object to it.

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>

<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>

<https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

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 the 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) holds 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>

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

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>

Transferring Data Internationally

Where we share data with an organisation that is based outside the UK, we will protect your data by following data protection law.

Your Information Rights

Data Protection law provides you with certain rights, as defined below.

- **Requesting access to your personal data**

You (or an authorised official representative) have the right to request access to information about you that we hold. If we do hold information about you, we will:

- Give you a description of it
- Conduct reasonable and proportionate searches to locate the information you have asked for
- Tell you why we are holding and using 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 if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)
- Give you a copy of the information.

To make a request to access your personal information, please contact the school's enquiry email or in writing to the headteacher.

When making a request you will need to confirm:

- The types of records you wish to access
- any date periods these relate to.

If you are unable to specify the types of records you wish to access or the relevant time periods, we will ask you to clarify your request. We may also extend the time period we have for complying with a request or refuse it if we determine it is manifestly unfounded or excessive.

We may require you to provide proof of your identity, before we can comply with your request.

- **Your Other Information Rights:**

- **The right to know how your information is being used** - We uphold this by publishing Privacy Notices and letting you know how your information will be used when we collect it.
- **The right to have inaccurate information amended** - We uphold this right by asking you to review the information we hold on record and updating information if you provide evidence to show it has changed.
- **The right to have information removed or deleted from your records** - We uphold this right by removing or deleting your information that we are no longer required to keep.
- **The right to temporarily restrict how your information is used** - We uphold this right by not using information until we have confirmed what is accurate, unless it is necessary to do so.
- **The right to object to us using your data for certain purposes** - We uphold this by asking for your consent or permission to use your information for these purposes (including direct marketing and for scientific/historical research and statistics).
- **The right to request data is transferred in recognisable (portable) format** - We uphold this by using systems and technologies suitable for the education sector or approved by the DfE. This applies where we process data in an automated form that has been supplied by you and our processing is based on your consent or a contract we have agreed to uphold.
- **The right for important decisions about you not to be made solely by automated systems that use your information (like computer algorithms and AI)** - We uphold this right by letting you know if these

systems are used and giving you a choice for these types of decisions to be reviewed.

Who to Contact

The trust has a Data Protection Officer and their role is to oversee and monitor our data protection procedures, and to make sure we are compliant with data protection legislation.

The Data Protection Officer is responsible for helping employees and other individuals uphold their information rights. You can contact our Data Protection Officer by emailing: dpo@ark.me.uk.

Complaints or Concerns

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with our Data Protection Officer in the first instance (see contact details above).

We will respond to your request within 30 days.

If you are still unsatisfied after the Data Protection Officer has considered your complaint, you have the right to raise a concern with the Information Commissioner's Office at: [Make a complaint | ICO](#)

Complaints that do not relate to the handling of personal data will be handled under the terms of the trust Concerns and Complaints Policy, which can be viewed here: [Policies - Keystone Academy Trust](#)

Revisions and last updated

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