Privacy Notice for Parents and Pupils – How we use your information

2019/20

Who are we?
Community Academies Trust is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Community Academies Trust is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: **ZA073240**

You can contact the Academy Trust as the Data Controller in writing at:
Community Academies Trust, The Polesworth School, Dordon Road, Tamworth, B78 1QT or datacontroller@communityacademiestrust.org.

What is a Privacy Notice?
A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our pupils and parents.

What is Personal Information?
Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information relates to personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

What personal information do we process about pupils and parents?
The pupil and parent information that we collect, hold and share includes:

- Personal information including a pupil's name, date of birth, unique pupil number and home address
- Characteristics such as ethnicity, language, nationality, country of birth and free school meal eligibility
- Attendance information such as sessions attended, number of absences and absence reasons.
- Educational information including records of work, assessment results, relevant medical information, details of pupils' special educational needs, exclusions/behavioural information, post-16 learning information.
- Contact information for parents, carers and other relatives, including telephone numbers, home addresses and e-mail addresses.
- Information about a child's home life, where required as part of necessary safeguarding and welfare processes.

Why do we use personal information?

We use pupil data:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing
- to safeguard pupils

Collecting pupil information
Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

What are the legal reasons for us to process your personal information?

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. The lawful reasons we have for processing personal information are as follows:

1) To comply with the law

We collect and use general purpose pupil information in order to meet certain legal requirements and legal obligations placed upon the Academy Trust by law. We therefore are required to this process personal information for such purposes even if you have not consented to us doing so.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

If you would like a copy of or further information regarding the statutory authorities that underpin our legal obligations, you should contact the Academy Trust in writing.

2) To protect someone's vital interests

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

3) With the consent of the individual to whom that information 'belongs'

Whilst much of the personal information processed is in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

4) To perform a public task

It is a day-to-day function of the Academy Trust to ensure that children receive the education and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that pupils are properly educated and supported

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In additional to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

1) Explicit consent of the data subject
2) Processing relates to personal data which is manifestly made public by the data subject
3) Necessary for establishing, exercising or defending legal claims
4) Necessary for reasons of substantial public interest
5) Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
6) Necessary for archiving, historical research or statistical purposes in the public interest

The lawful reasons for each type of special category personal information data that we process is set out in the tables attached.

Who might we share your information with?
We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)

We do not share information about our pupils or parents unless the law and our policies allow us to do so.

Please refer to the tables for information about what personal information is shared with which specific third parties.

Data collection requirements:
To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to https://www.gov.uk/education/data-collection-and-censuses-for-schools.

What do we do with your information?
All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected The Academy Trust monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

How long do we keep your information for?
In retaining personal information, the Academy Trust complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the Academy Trust are required to retain the information.

A copy of those schedules can be located using the following link:
http://irms.org.uk/page/SchoolsToolkit

Transferring data internationally
Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

What are your rights with respect of your personal information?

Under data protection law, 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 to have access to your child's educational record, contact the School Data Protection Officer at Warwickshire Legal Services via email at schooldpo@warwickshire.gov.uk or alternatively;

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL

****Please ensure you specify which school your request relates to.**

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at https://ico.org.uk/concerns/

Review
The content of this Privacy Notice will be reviewed in July 2020.

Table 1 – Personal information we are required to process to comply with the law:

Information Type	Relevant legislation	Special Category– additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
• Student name • Gender • Date of birth • Address • First language • Date of admission to school • National curriculum year group • Eligibility for free school meals • Whether a pupil is looked after and the local authority by whom the pupil is looked after • Where a pupil has been but is no longer looked after, the type of order resulting in them no longer being looked after • Details of exclusions start and end date, number of sessions, fixed length/permanent, reason for exclusion • Attendance records including whether absence was authorised/unauthorised and reasons for absence • SEN status, start date, details of needs and provision • Ethnicity • Parental responsibility • Doctor	The Education (Information about individual pupils) (England) Regulations 2013	Consent	Local Authority in which the school is situated: Telford and Wrekin Staffordshire Warwickshire Department for Education School to which pupil has transferred	Legal obligation

• National identity • Country of birth • Nationality • UPN • Mode of transport to school • Proficiency in English	The Education Act 1996		Local Authority in which the school is situated: Telford and Wrekin Staffordshire Warwickshire Department for Education School to which pupil has transferred	Legal obligation
• Last school attended (name and address) • Assessment data • End of Key Stage Year 1 phonics • End of Key Stage 2 Assessments • Foundation stage assessment details	The Education (Pupil information) (England) Regulations 2005		Local Authority in which the school is situated: Telford and Wrekin Staffordshire Warwickshire Department for Education School to which pupil has transferred	Legal obligation
• Pupil annual report • Medical information including allergies • Court order	The Education (Pupil information) (England) Regulations 2005		School to which pupil has transferred	Legal obligation

• Parents name and address • Parents telephone number (if pupil usually resides with them)	The Education (Pupil information) (England) Regulations 2006		Local Authority in which the school is situated: Telford and Wrekin Staffordshire Warwickshire Department for Education School to which pupil has transferred	Legal obligation
• Child protection and safeguarding documentation including concern forms and case documentation	KCSIE The Children's Act 1989		Local Authority in which the school is situated: Telford and Wrekin Staffordshire Warwickshire Police	Legal obligation
• Destinations – where the child has gone to	KCSIE		Local Authority in which the school is situated: Telford and Wrekin Staffordshire Warwickshire Department for Education	Legal obligation
• Student name • Date of Birth • Address • Telephone number • Offer for September			Prospects Careers Company (part of WCC)	Legal obligation
• Student Name • UPN • ULN • Date of Birth • Address • Postcode • Home Phone Number • Mobile Phone Number • School Email Address	Education and Skills Act 2008		Prospects Careers Company, Local Authority, DfE.	Legal Obligation [1]

[1]Please note pupils who are 16+, parents and guardians can object to any information other than pupil name, address and date of birth being shared with the local authority or Prospects by letting us know. Please contact to the office on … if you object to us sharing this information.

• Private Email Address • Private Email Address (Parent / Guardian) • Whether a pupil is looked after and the local authority by whom the pupil is looked after • SEN Status				

Table 2 – Personal information we are required to process as it is necessary to protect someone's vital interests

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Medical information including allergies	Necessary to protect vital interests of the data subject	Emergency services	Vital interests
Student name Date of birth Gender Religion Address	Vital interests	Emergency services	Vital interests
Emergency contacts		Emergency services	Vital interests
Student name Gender Health information		Other schools for intra-school activities	Vital interests

Table 3 - Personal information we are required to process with the consent of the individual to whom that information 'belongs'

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
• Student name • Student UPN • Parent name • Address • Gender		ParentPay	Consent
• Student name • Year group • Registration group • Date of birth • Parent name • Address • Email address		ParentMail	Consent
• Parent mobile number • Student name • Year group • Club attendance		Teachers2Parents text message GroupCall	Consent
• Name • Date of birth • Gender • Address • Student email address • Student phone number • Home phone number • First language • School details • Parent name • Parent address • Parental responsibility • Parent phone number • Parent email address • Details of other people in the household • Details of special needs • Looked after child • Subject to child protection plan • CAF • Adopted • Young carer • Constant supervision required • Details of social worker • Ethnicity	Consent	Snowford Grange CAMHS Educational Psychology Services for Warwickshire, Staffordshire and Telford & Wrekin Sycamore Counselling The Warren (George Eliot Hospital)	Consent
• Student name • Date of birth • Class		Cool Milk (only of pupils aged under 5)	Consent
• Photograph		Public record on website	Consent

• Student name • National curriculum year group • Dietary restrictions	Necessary to protect vital interests of the data subject	**School catering** ParentPay Residential accommodation	Consent
• Student name • National curriculum year group • Registration group • Admission number • FSM		Nationwide Cashless Catering – query with DPO.	Consent
• Student name • Telephone number • Year group • Parent name • Club attendance		PARS (insight) Eschools SchoolComms	Consent
• Student name • Student DoB • Address • Parent name • Parent telephone number • Medical/dietary concerns • GP details • First language • Child in Need/Child Protection issues		School nurse	Consent
• Dietary restrictions	Consent	External school catering provider: Telford & Wrekin EduCaterers Class catering Outdoor education providers Relevant curriculum provision	Consent
• Student name • Gender • DoB • Parent contact details • Address • First language • National curriculum year group • LAC • Attendance • SEND status • Ethnicity	Consent	Young Carers	Consent
• Student name • Class • Date of birth • Parent name		Childcare Online Booking	Consent

Table 4 - Personal information we are required to process because it is necessary to do so in order to perform a public task

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
• Child Protection and Safeguarding documentation including concern forms and case documentation	n/a	Police	Performance of a public task
• Student name • Gender • Date of birth • Address • First language • Date of admission to school • National curriculum year group • Eligibility for free school meals • Whether a pupil is looked after and the local authority by whom the pupil is looked after • Where a pupil has been but is no longer looked after, the type of order resulting in them no longer being looked after • Details of exclusions start and end date, number of sessions, fixed length/permanent, reason for exclusion • Attendance records including whether absence was authorised/unauthorised and reasons for absence • SEN status, start date, details of needs and provision		MIS system provider BromCom Scholarpack CMIS SIMS Evolve	Public task
• Ethnicity	Consent		

• Student name • External assessment results • Predicted grades • Gifted and talented • FSM • Service children • Ethnicity • Attendance percentage • Previous primary school • Stability indicator/mobile students • Date of birth • Gender • EAL (first language) • LAC • PP • UPN • National curriculum year group • SEND status and area of need within SEND • Catch up premium • Premature birth?	Consent	**Assessment Tools** • Accelerated Reader • Emerge • SISRA • Pixl • GCSEPod • SAM Learning • OTrack • FFT • Go4Schools • Power of Reading • Cornerstones • Doddle • Tapestry **Third party data processors** • GroupCall • Wonde	Public task
• Student name • telephone number • addresses of emergency contacts other than parent(s) with whom pupil resides			Public task
• SEN documentation including SEND provision maps, personal learning plans EHCPs, reports from external agencies		Local Authority in which the school is situated: Telford and Wrekin Staffordshire Warwickshire	Public task

• Student name • Gender • DoB • Parent contact details • Address • First language • Date of admission to school • National curriculum year group • FSM eligibility • LAC • PP • Number of exclusions • Attendance • SEND status • Ethnicity • National identity • Country of birth • Nationality • UPN		Education Welfare Officer	Public Task
• Student name • National curriculum year group • Date of birth • Gender		**Library systems** Eclipse Renaissance Junior Librarian Heritage	Public task
• Student name • Student email address • National curriculum year		**Homework and revision platforms** MyMaths Kerboodle Nessy Times Table Rockstar	Public task
• Student name • Registration group • National curriculum year group • Date of birth • Photograph		**Signing In System** Inventry Edit Biostore	Public task Consent

• Student name Gender • School name • FSM • Social care status • Priority family status • Date of birth • Address • First language • Date of admission to school • National curriculum year group • Whether a pupil is looked after and the local authority by whom the pupil is looked after • Where a pupil has been but is no longer looked after, the type of order resulting in them no longer being looked after • Details of exclusions start and end date, number of sessions, fixed length/permanent, reason for exclusion • Attendance records including whether absence was authorised/unauthorised and reasons for absence • SEN status, start date, details of needs and provision • Health information • Ethnicity	Consent	**Alternative Provision** AFC Telford KickStart The Lyndon Centre Hadley Learning Community – Queensway House 1 Crossbar North Warwickshire Area Behaviour Partnership NW & Hinckley College Wyldwoods	Public task
• Student name • Gender • Date of birth • Exam number • UCI • ULN (Unique Learner Number) • UPN(Unique Pupil Number)		**Exam Boards** EdExcel/Pearson (SATs) AQA OCR PEARSON WJEC RSL (not from September 2018) LBF (from September 2018)	Public Tasks
• Student name • Email address • Class name • Date of birth		**Learning Platform** Frog Eschools Task Insight	Public task

		Purple Mash	
• Student name • Class • Year group • Behaviour record • Attendance record		**Rewards Systems** Class dojo PARS/insight	Public task
• Student name • Date of birth • Destination • Gender • National curriculum year group		**Work experience** Local authority Employer Prospects Careers Company (WCC)	Public task
• Student name • Address • Gender • Date of birth • Parent contact details • First language • Date of admission to school • National curriculum year group • FSM eligibility • LAC • PP • Number of exclusions • Attendance • SEND status • Ethnicity • National identity • Country of birth • Nationality • UPN	Consent	Post 16 Providers	Public task
• Name • Gender • DoB • Address (postcode only) • Ethnicity • Disability status • FSM eligibility • LAC status	Consent	University of Wolverhampton Aspire to HE	Public task

• Name • Gender • DoB • Parent contact details • Address • First language • Date of admission to school • National curriculum year group • FSM eligibility • LAC • PP • Number of exclusions • Attendance • SEND status • Ethnicity • National identity • Country of birth • Nationality • UPN	Consent	Grofar (careers service)	Public task
• Student name • Gender • National curriculum year group • Health information		Other schools for intra-school activities	Public task
• Student name • Gender • Date of birth • Address • First language • Date of admission to school • National curriculum year group • Eligibility for free school meals • Whether a pupil is looked after and the local authority by whom the pupil is looked after • Where a pupil has been but is no longer looked after, the type of order resulting in them no longer being looked after • Attendance records including whether absence was authorised/unauthorised and reasons for absence • SEN status, start date,		CPOMS	Public task

details of needs and provision • Ethnicity	Consent		
• Student name • Gender • DoB • Parent contact details • Address • First language • Date of admission to school • National curriculum year group • FSM eligibility • LAC • PP • Number of exclusions • Attendance • SEND status • Ethnicity • National identity • Country of birth • Nationality • UPN		Family Connect (safeguarding incidents)	Public task
• Student name • School year • Health information • Date of birth • SEN • Gender		PPA Cover/Curriculum delivered by outside agencies Swimming teachers Forest schools Sports coaches Bikeability	Public task

• Student name • Gender • Date of birth • Address • First language • Date of admission to school • National curriculum year group • Eligibility for free school meals • Whether a pupil is looked after and the local authority by whom the pupil is looked after • Where a pupil has been but is no longer looked after, the type of order resulting in them no longer being looked after • Details of exclusions start and end date, number of sessions, fixed length/permanent, reason for exclusion • Attendance records including whether absence was authorised/unauthorised and reasons for absence • SEN status, start date, details of needs and provision • Ethnicity • Assessment data • Parent contact details • PP • National identity • Country of birth • Nationality • UPN	Consent	Virtual School Head at Local Authority	Public task

• Student name • Gender • DoB • Parent contact details • Address • First language • Date of admission to school • National curriculum year group • FSM eligibility • LAC • PP • Number of exclusions • Attendance • SEND status • Ethnicity • National identity • Country of birth • Nationality • UPN	Consent	Social Services	Public task
• CCTV images		Exclusion Panel	Public task