



Staploe Education Trust

Privacy notice for parents and carers – use of your child’s personal data

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1. Introduction

Under UK data protection law, individuals have a right to be informed about how our Trust uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about pupils in our Trust.

This privacy notice applies while we believe your child is not capable of understanding and exercising their own data protection rights.

Once your child is able to understand their rights over their own data (generally considered to be age 12, but this has to be considered on a case-by-case basis), you should instead refer to our privacy notice for pupils to see what rights they have over their own personal data. This can be found on the Trust's website.

Our trust, the Staploe Education Trust, are the 'data controller' for the purposes of UK data protection law.

Our data protection officer is the Operations Director (see 'Contact us' below).

The Trust is registered with the Information Commissioner's Office and follows the principles of the UKGDPR. This privacy notice covers all schools within the Trust.

2. The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about your child includes, but is not restricted to:

- Personal information (such as name, gender, date of birth, unique pupil number)
- Contact details (including parental and emergency contact information)
- Free School Meal eligibility
- Safeguarding information (including court orders and external professional involvement)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Assessment and Exam information (both internally and externally set tests)
- Medical information (including doctor's information)
- Behaviour information
- Exclusion information
- Post-16 Learning information
- Images of pupils through photographs and videos
- Biometric data points of a fingerprint

We may also collect, use, store and share (when appropriate) information about your child that falls into "special categories" under UK GDPR. This includes, but is not restricted to, information about:

- Personal data revealing racial and ethnic origins
- Personal data revealing political opinions
- Personal data revealing religious or philosophical beliefs
- Personal data revealing sexual orientation
- Biometric data
- Medical data (including but not limited to any physical and mental health conditions, special educational needs or disabilities)
- Images of pupils captured from CCTV around the site

We may also hold data about your child that we have received from other organisations, including other schools and social services.

3. Why we use this data

We use the data listed above to:

- Safeguard pupils
- Support pupil learning
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Provide Free School Meals and pupil premium interventions

- Protect pupil welfare
- Support school admission processes
- Assess the quality of our services
- Improve teaching and learning
- Detect/prevent crime (CCTV footage)
- Comply with the law regarding data sharing

3.1 Use of your child's personal data for marketing purposes

Where you have given us consent to do so, we may send marketing information by email promoting school events, campaigns, charitable causes or services that may be of interest.

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 (see 'Contact us' below).

3.2 Use of your child's personal data in automated decision making and profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

4. Our lawful basis for using this data

The lawful bases for processing are set out in Article 6 of the UK GDPR. At least one of these must apply whenever you process personal data.

- In accordance with Article 6 (a) Consent we will process data to:
 - Use media such as photos and videos outside of the Trust (i.e to media outlets or on the Trust's websites or social media platforms)
 - Operate Trust systems that use Biometric data such as cashless catering systems
- In accordance with Article 6 (c) Legal obligation we will process data to:
 - Comply with the legal rules set by the DfE that require us to collect personal information about our pupils
 - Comply with laws relating to attendance
 - Monitor and report on your pupil progress
 - Provide appropriate pastoral care
 - Measure and assess the quality of our services
 - Protect pupil welfare
 - To keep you safe and well. For example, to keep information about your food allergies and who to contact if there is a medical emergency.
- In accordance with Article 6 (e) Public task we will process data to:
 - Allow the necessary running of the Trust, our academies and provide education
 - Support learning
 - Monitor our ICT systems
 - Carry out investigations or look into complaints
 - Keep our pupils safe and secure

Where you have provided us with consent to use your child's data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your child's personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you

- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

5. Collecting this data

While the majority of information we collect about your child is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about your child will come from you, from admissions forms on entry, but we may also hold data about your child from:

- Local authorities
- Previous schools
- The Department for Education (DfE)
- Government departments or agencies
- Police forces, courts, tribunals

6. How we store this data

We keep personal information about your child while they are attending our school(s). We may also keep it beyond their attendance at our school if this is necessary. Our Data Retention Policy sets out how long we keep information about pupils.

We have put in place appropriate security measures to prevent your child's personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your child's personal data securely when we no longer need it.

7. Who we share data with

We do not share information about your child with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required or necessary (and it complies with UK data protection law), we may share personal information about your child with:

- Cambridgeshire County Council
- the Department for Education
- Education and Skills Funding Agency
- Exam Boards
- Schools that a pupil attends after leaving us

- School Nurse and Health Services
- Youth support services providers
- Travel companies for school trips
- Companies including FFT and PIXL for assessment data comparison
- Suppliers including those who provide services such as parent finance, cashless catering, photography, Management Information Systems and online educational tools.
- Law enforcement agencies

National Pupil Database

We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school census and early years census.

Some of this information is then stored in the [National Pupil Database \(NPD\)](#), which is owned and managed by the Department for Education and provides evidence on school performance to inform research.

The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The Department for Education may share information from the NPD with third parties, such as other organisations which promote children's education or wellbeing in England. These third parties must agree to strict terms and conditions about how they will use the data.

For more information, see the Department for Education's webpage on [how it collects and shares research data](#).

You can also [contact the Department for Education](#) with any further questions about the NPD.

Youth support services - Pupils ages 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 such as:

- Youth support services
- Careers advisers

This information is limited to the child's name, address and date of birth. However where consent is granted, other information relevant to the provision of youth services will be shared.

Data is securely transferred to the youth support service via a secured method and is securely stored in line with the local authorities retention schedule.

7.1 Transferring data internationally

We do not normally transfer information outside the UK. Where it is necessary, we will try to ensure adequacy in the country's data protection laws. Where we cannot ensure adequacy, we will communicate to pupils and parents about the risks and ensure additional consent is given for the specific use.

Where we transfer your child's personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

8. Your rights

8.1 How to access personal information that we hold about your child

You have a right to make a 'subject access request' to gain access to personal information that we hold about your child.

If you make a subject access request, and if we do hold information about your child, we will (subject to any exemptions that apply):

- Give you a description of it
- Tell you why we are holding and processing 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 whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your child's personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

Once your child is able to understand their rights over their own data (generally considered to be age 12, but this has to be considered on a case-by-case basis), we will need to obtain consent from your child for you to make a subject access request on their behalf.

8.2 Your right to access your child's educational record

In academies, including free schools, and independent schools there is no automatic parental right of access to the educational record. A request for the record can be made in the same way as the Subject Access Requests detailed above and requests will be dealt with on a case by case basis.

8.3 Your other rights regarding your child's data

Under UK data protection law, you have certain rights regarding how your child's personal data is used and kept safe. For example, you have the right to:

- Object to our use of your child's personal data
- Prevent your child's data being used to send direct marketing
- Object to and challenge the use of your child's personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about your child deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your child's personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

Once your child is able to understand their rights over their own data (generally considered to be age 12, but this has to be considered on a case-by-case basis), we will need to obtain consent from your child for you to make these requests on their behalf.

9. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

10. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer by email at DPO@staploeeducationtrust.org.uk or write to

Data Protection Officer,
Staploe Education Trust,
Soham Village College,
Sand Street,
Soham,
Cambridgeshire,
CB7 5AA