



# Privacy Notice – Pupils

<b>Policy Code:</b>	Gov8
<b>Policy Start Date:</b>	March 2024
<b>Policy Review Date:</b>	March 2025

## **1. Introduction**

The Trust has a duty to inform pupils and their families of how they process the data that is in the Trust's control – this is done through providing pupils and their families with a privacy notice.

We collect and hold personal information relating to our pupils and may also receive information about them from their previous school. The Trust uses and processes pupil information within the remit of the Regulation (EU) 2016/679 (General Data Protection Regulation), referred to throughout this statement as the GDPR.

## **2. The categories of pupil information that we collect, hold and share include:**

- Personal information (such as name, unique pupil number and address, gender);
- 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);
- Assessment information (such as internal tests, pupils' progress information and examination results);
- Medical information (such as allergies to food, medication a student may require and medical incidents that have occurred inside or outside school that may affect learning);
- Special Educational Needs and Disabilities information (such as specific learning difficulties, specific medical needs and previous learning or medical needs);
- Behavioural information (such as rewards, achievements, incident slips and exclusions);
- Post-16 information (such as destinations data).

## **3. Why we collect and use this information**

We use the pupil data:

- To support pupil learning.
- To monitor and report on pupil progress.
- To provide appropriate care and guidance.
- To assess the quality of our services.
- To comply with the law regarding data sharing.

## **4. How do we collect and use personal information of pupils?**

- School Registration Forms
- Information sent from previous schools

## **5. How long will we keep pupil information?**

We will only keep pupil data for as long as is necessary and in line with government guidelines and the Trust's Records Management Policy.

## **6. The lawful basis on which we process this information**

We collect and use pupil information under Article 6 (1c and 1e) and Article 9 (1, 2b and

2f) of the GDPR; this enables the Trust to process information such as assessments, special educational needs requests, Departmental Censuses under the Education Act 1996, examination results and other such data processes that relate educational data to the individual within the requirements for the Trust to provide education for the individual.

## **7. 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.

## **8. Storing pupil data**

We hold pupil data in line with our Data Retention Guidelines, which are available upon request.

## **9. Who we share pupil information with**

We routinely share pupil information with:

- Schools that the pupils attend after leaving us
- Local Authorities
- The Department for Education (DfE)
- The School Nursing Team
- The National Health Service
- Our Careers Advisory Service
- Our Educational Welfare Service.

We share this information (where appropriate) with them to make sure they can provide the following services:

- Youth support services
- Careers advisers
- Post-16 education and training providers

We will only share a pupil's name, address and date of birth, but if your parents or the person who looks after a pupil gives their permission, we may share other relevant information. When you turn 16, it is up to you whether you want to share this information.

### **9.1 Department for Education (DfE)**

The Trust needs to share certain information with the DfE to make sure we meet certain laws, including Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

All information we share with the DfE is given to them safely and kept by the DfE under strict safety rules.

### **9.2 How does the government use your information?**

The pupil information that we need to share with the DfE:

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- Makes sure our Trust can get the money it is entitled to.
- Helps the government to create rules for schools.
- Helps the government to research future rules that may need to be put in place for schools.

To find out more about why we need to give the DfE your information, follow this link: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

### **9.3 Sharing by the DfE**

The DfE is legally allowed to share your personal information with certain individuals and organisations, including the following:

- Schools
- LAs
- Researchers
- Organisations that support your wellbeing
- Other parts of the government
- People that fight 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>

### **9.4 How to find out what personal information the DfE holds about you?**

You are legally allowed to ask the DfE what personal information it holds about you. You have the right to ask the DfE:

- If it uses your personal information.
- What information it holds about you.
- Why your information is held and who it might be shared with.
- For a copy of your personal data and any details of its source.

You can find out more about this 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>.

### **9.5 What are your rights?**

You and your parents or legal guardians have the right to:

- Be told how we use your information.
- Ask to see the information we hold.
- Ask us to change information you think is wrong.
- Ask us to remove information when it is not needed anymore.
- Ask us to only use your information in certain ways.
- Tell us you do not want your information to be processed.

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- Say no to direct marketing (people trying to sell you things).
- Stop people using your information for scientific, research or statistical purposes.

If you want to request for us to give you a copy of the information we hold about you, or if you want access to the information that we hold, you can contact the Headteacher or Data Protection Officer of the Trust and they will be able to help you.

You also have the right not to be subject to decisions based purely on automated processing. This means that we will not make important decisions about you and your education based only on what a computer tells us. We will always think carefully about these decisions to make sure you are treated fairly.

If the information we are collecting is information that you can choose not to give, you can tell us to stop collecting it at any time.

If you are worried about how we get and use your information, you can speak to the Headteacher at the school or Data Protection Officer at the Trust, who will be able to help you and answer any questions that you have. If you want to speak to somebody not at the school, you can contact the people who look after information, called the Information Commissioner's Office (ICO), on 0303 123 1113 or using their live chat which can be accessed through this link: <https://ico.org.uk/global/contact-us/live-chat>

### **9.6 If you are not happy with how we have handled your data**

If for any reason you are not happy with the way we have handled your data, you can tell us at any time, even if you are not sure whether your data has been handled incorrectly. Contact Sarah Fardell, Data Protection Officer at the Trust as soon as you think something is wrong, and they will be able to help you. Remember, we want to make sure that everyone's choices are respected and their data is handled properly – if you are not happy or think something has gone wrong, it is important you let us know as soon as possible.

### **9.7 Why we share pupil information**

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

We share pupils' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins Trust funding and educational attainment policy and monitoring.

We are required to share information about our pupils with the (DfE) under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

## **10. 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>

## **11. Youth support services**

### **Pupils aged 13+**

Once our pupils reach the age of 13, we also pass pupil information to Local Authorities and/or providers of youth support services, as they have responsibilities in relation to the

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education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- Youth support services;
- Careers advisers;
- Post-16 education and training providers.

A parent or guardian can request that only their child's name, address and date of birth is passed to their Local Authority or provider of youth support services by informing us. This right is transferred to the child/pupil once he/she/they reach(es) the age of 16.

For more information about services for young people, please visit the relevant Local Authority website.

### **Pupils aged 16+**

We will also share certain information about pupils aged 16+ with Local Authorities 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 as follows:

- Post-16 education and training providers;
- Youth support services;
- Careers advisers.

For more information about services for young people, please visit the relevant Local Authority website.

## **12. The National Pupil Database (NPD)**

The NPD is owned and managed by the Department for Education 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. 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.

We are required by law to provide information about our pupils to the DfE as part of statutory data collections such as the school census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013.

To find out more about the NPD, go to:

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

The Department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- Conducting research or analysis;
- Producing statistics;
- Providing information, advice or guidance.

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The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether the DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- Who is requesting the data.
- The purpose for which it is required.
- The level and sensitivity of data requested.
- The arrangements in place to store and handle the data.

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the Department's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the Department has provided pupil information, (and for which project), please visit the following website: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

To contact the DfE: <https://www.gov.uk/contact-dfe>

### **13. CCTV in school**

CCTV systems are installed (both internally and externally) in premises for the purpose of enhancing security of the building and its associated equipment, as well as creating a mindfulness among the occupants, at any one time, that a surveillance security system is in operation within and/or in the external environs of the premises during both the daylight and night hours each day. The systems comprise of a number of fixed and dome cameras with some having sound recording capability. CCTV surveillance at the Trust is intended for the purposes of:

- Protecting the Trust buildings and assets, both during and after school/working hours.
- Promoting the health and safety of staff, pupils and visitors.
- Preventing bullying.
- Reducing the incidence of crime and anti-social behaviour (including theft and vandalism).
- Supporting the Trust in a bid to deter and detect crime.
- Assisting in identifying, apprehending and prosecuting offenders; and
- Ensuring that the Trust rules are respected so that the school can be properly managed.

### **14. Photographing and Naming of Students in relation to Marketing and Publicity – Data Protection Act Update (GDPR) – May 2018**

To celebrate the achievements of our students, we would like to display photographs and information about the wide range of activities with which our students are involved. This may range from academic achievement and exam success to photos of students participating in trips and extra-curricular events. This is to recognise their personal success, generate enthusiasm and to inspire current and future generations of students. These displays may be internal on notice boards, school and Trust newsletters, school and Trust brochures or externally on the school and Trust websites and social media accounts, or in

the local and national media by way of photographs, names and interviews.

Your school will have a list of consent permissions, which you and/or your parent or carer will have completed when you joined the school. A record of your responses will be collated and stored in school.

Please understand that the permissions ONLY relate to marketing and publicity at the school and the Community Inclusive Trust. There will be educational instances where your child may be recorded (as part of certain subject syllabi) and photos taken and stored on internal IT systems which are an essential part of the school's day to day functions. You may not have the option to opt out of these occurrences.

Even after giving permission, at any point in the future you have the right to withdraw consent for any of the permissions given. Please contact us via [enquiries@citacademies.co.uk](mailto:enquiries@citacademies.co.uk)

If you have any queries in relation to this, then please contact Sarah Fardell as the Trust's Data Protection Officer, e-mail: [dpo@citacademies.co.uk](mailto:dpo@citacademies.co.uk)

#### **15. School/Trust Newsletters**

Again, to celebrate the achievements of our students we would like to keep you informed via a school or Trust newsletter. Under the new GDPR Law we do require your consent to send this information out to you in both electronic format and hard copy.

#### **16. Requesting access to your personal data**

Under Data Protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, please contact:

Sarah Fardell, Data Protection Officer, Community Inclusive Trust, Warwick House, Long Bennington Business Park, Long Bennington NG23 5JR.

E-mail: [dpo@citacademies.co.uk](mailto:dpo@citacademies.co.uk)

#### **17. Disposal of records**

Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it.

For example, we will shred or incinerate paper-based records, and overwrite or delete electronic files. We may also use a third party to safely dispose of records on the Trust's behalf. If we do so, we will require the third party to provide sufficient guarantees that it complies with Data Protection law.

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.



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- 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, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

### **18. Contact**

If you would like to discuss anything in this privacy notice, please contact:

Sarah Fardell  
Community Inclusive Trust  
Warwick House  
Long Bennington Business Park  
Long Bennington  
NG23 5JR

Telephone: 03300 585520  
e-mail: [DPO@citacademies.co.uk](mailto:DPO@citacademies.co.uk)