



## PRIVACY NOTICE

### FOR PUPILS

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was updated on **7<sup>th</sup> November 2019**. You will find the latest version of the Privacy Notice for Pupils at [www.pdet.org.uk](http://www.pdet.org.uk) or your child's academy's website.

## **Privacy Notice for Pupils (*issued to parents and carers due to the pupils age*)**

This privacy notice applies whilst 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), they will be entitled to their own Privacy Notice.

### **This document is about how we collect, store and use personal information (or personal data) about pupils.**

#### **Who we are**

Your child's school / academy (academy) is part of the Academy Trust called Peterborough Diocese Education Trust (PDET). The Academy Trust is the organisation which is in charge of your child's personal information. This means the Academy Trust is called the Data Controller.

The postal address of the Academy Trust is Unit 2 Bouverie Court, 6 The Lakes, Bedford Road, Northampton, NN4 7YD.

If you want to contact us about your child's personal information, you can contact our Data Protection Officer who is Angela Corbyn in the following ways:

- By telephone on 07523 512957
- Leave a letter at our offices at the address above or send one by post
- By email: [dpo.pdet@peterborough-diocese.org.uk](mailto:dpo.pdet@peterborough-diocese.org.uk)

In this policy 'we' and 'us' means the Academy Trust.

#### **The categories of pupil information that we process**

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

- personal information (such as name, date of birth, address and unique pupil number);
- contact details (such as email address and telephone numbers);
- characteristics (such as ethnicity, gender and language);
- safeguarding information (such as court orders and professional involvement);
- special educational needs (including the support, needs and ranking);

- medical and administrative information (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 or early years settings attended);
- results of internal and external assessments and tests (such as key stage 1, 2 and phonics screening results);
- behavioural information (such as exclusions and any relevant alternative provision put in place);
- information about free school meal and pupil premium eligibility;
- information for catering management purposes (e.g. whether your child has school dinners and how often);
- photographs of your child for education purposes (e.g. to document learning and achievements within workbooks, classroom displays and reward systems, pupil profiles and for medical needs identification) ;
- CCTV footage and images;
- any additional support provided to your child.

### **Why we collect and use pupil information**

We collect and hold personal information relating to our pupils and may also receive information about them from their previous early years settings, previous school, local authority and / or the Department for Education (DfE). We use this personal data to:

- support pupil learning;
- monitor and report on pupil progress;
- provide appropriate care for our pupils;
- provide pastoral care and for the purpose of pupil welfare;
- assess the quality of our services;
- keep pupils safe (food allergies, or emergency contact details);
- comply with the statutory duties placed on us.

The use of pupil information for these purposes is lawful for the following reasons:

- The Academy Trust is under a legal obligation to collect the information or the information is necessary for us to meet legal requirements imposed upon us such as our duty to safeguard pupils.
- It is necessary for us to hold and use pupil information for the purposes of our functions in providing schooling and so we can look after our pupils. This is a function which is in the public interest because everybody needs to have an education. This means we have a real and proper reason to use pupil information.

- There is a substantial public interest in processing pupil's information because it is necessary to keep our pupils safe from harm.

We will not usually need your consent to use your child's information. However, if at any time it appears to us that we would like to use your child's personal data in a way which means that we would need your consent then we will explain to you what we want to do and ask you for consent (for example, for some uses of photographs). This is most likely to be where we are involved in activities which are not really part of our job as an Academy Trust / academy but we are involved because we think it would benefit our pupils. If you give your consent, you may change your mind at any time.

### **How we collect pupil information**

We collect pupil information via data collection sheets and forms that we ask parents / carers to complete. It is important to update us if any information that we hold about your child changes. When we collect personal information on our forms, we will make it clear whether there is a legal requirement for you to provide it, whether there is a legal requirement on the Academy Trust to collect it. If there is no legal requirement then we will explain why we need it and what the consequences are if it is not provided.

We will also obtain information from a pupil's previous school or early years setting and the local authority,

### **How long we keep pupil information**

We only keep pupil information for as long as we need to or for as long as the law requires us to. Most of the information we have about a pupil will be in their pupil file. We usually keep these until a pupil's 25<sup>th</sup> birthday unless they move to another school in which case we send the file to their new school. We might need to continue to hold some personal data for a period of time after your child has left the academy. We have a policy which explains how long we keep information. It is called the Records Retention Policy and you can find it on the academy's website or you can ask for a copy at your child's academy's office.

### **When we may share pupil information with others**

We will not give information about pupils to anyone without their parent's / carer's consent unless the law and our policies allow us to do so.

We will take family circumstances into account, in particular where a Court has decided what information a parent/carer is allowed to have.

Where it is legally required, or necessary (and it complies with data protection law) we may share pupil information with:

- A pupil's new school if they move schools;
- Professionals connected with SEN support;
- School nurse (NHS);
- Our local authority;
- The Department for Education (DfE);
- Ofsted;
- Examining bodies;
- Suppliers and service providers – to enable them to provide the service we have contracted them for (such as school caterers, sports coaches, parent communication facilities);
- Support services such as school counsellors, CAMHS (Child and Adolescent Mental Health Service);
- Provider of the Academy Trust's data analytics system;
- The Police;
- Independent reviewer where a complaint has been made by a parent/carer.

The information disclosed to these people / services will include sensitive personal information about pupils. Usually this means information about a pupil's health and any special educational needs or disabilities which they have. We do this so that pupils can receive the necessary support.

We are required, by law under regulation 5 of the Education (Information about Individual Pupils) England Regulations 2013, to pass some information about our pupils to the Department for Education (DfE). This is the part of the Government which is responsible for schools. This information may, in turn, then be made available for use by the local authority.

The DfE may also share information about pupils that we give to them, with other people or organisations. This will only take place where the law, including the law about data protection allows it. See the section on 'How Government uses your data' at the end of this document for more information.

We do not normally transfer pupil information to a country which is outside the European Economic Area. This would only happen if the parent/carer lives abroad or if the pupil moves to a new school abroad. If this happens we will be very careful to make sure that it is safe to transfer pupil information. We will look at whether that other country has good

data protection laws for example. If we cannot be sure that it is safe then we will talk to you about it and make sure that you are happy for us to send your child's information. As this is not something we normally do and we don't know which country we might need to send your child's information to, we cannot tell you more about it now, but if we want to transfer your child's data to a different country then we will tell you whether or not we think it is safe and why we have decided that.

**You have these rights:**

- You can ask us for a copy of the information we have about your child;
- You can ask us to correct any information we have about your child if you think it is wrong;
- You can ask us to erase information about your child (although we may have good reasons why we cannot do this);
- You can ask us to limit what we are doing with your child's information;
- You can object to what we are doing with your child's information;
- You can ask us to transfer your child's information to another organisation in a format that makes it easy for them to use.

If you want to use your rights, for example, by requesting a copy of the information which we hold about your child, please contact the Data Protection Officer. There is more information in our Combined Data Protection and FOI Policy. The policy can be found on our website - [www.pdet.org.uk](http://www.pdet.org.uk) or your child's academy's website.

You can complain to our DPO (contact details on page 2) about what we do in relation to your child's personal information. If you are not happy with our answer to your complaint then you can complain to the Information Commissioner's Office:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

## **How Government uses your data**

The pupil data that we lawfully share with the 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 (for example; via the school census) go to

<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 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.

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-pupil-database-user-guide-and-supporting-information>

## **Sharing by the Department**

The law allows the Department 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's 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 DfE to request access to individual level information relevant to detecting that crime. Whilst numbers fluctuate slightly over time, DfE typically supplies data on around 600 pupils per year to the Home Office and roughly 1 per year to the Police.

For information about which organisations the Department has provided pupil information, (and for which project) or to access a monthly breakdown of data share volumes with 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 DfE hold about your child**

Under the terms of the Data Protection Act 2018, you are entitled to ask the Department:

- if they are processing your child's personal data
- for a description of the data they hold about your child
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your child's personal data and any details of its source

If you want to see the personal data held about your child by the Department, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:

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

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