



# Privacy Notice for Parents & Carers

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## 1. Introduction

### **This Privacy Notice is for Parent/Carers**

The Data Protection Act 2018 provides individuals with a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing this 'privacy notice.' It explains how we collect, store and use personal data about pupils.

We, Inspira Academy Trust, are the 'data controller' for the purposes of data protection law.

Our Data Protection Officer is Satswana Ltd. Contact details can be found at the end of this policy.

## 2. The personal data we hold

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

- > Name
- > Contact details (i.e. name, address, email address & telephone numbers) and your contact preferences,
- > Date of birth
- > Identification documents
- > Details of your family circumstances
- > Parental, sibling and extended family details
- > Children who are adopted from care, looked after children, under special guardianship
- > Results of internal assessments and externally set tests
- > Pupil and curricular records
- > Characteristics, such as ethnic background, language, eligibility for free school meals, Pupil Premium or special educational needs
- > Exclusion information
- > Details of any medical conditions, including physical and mental health
- > Attendance information
- > Safeguarding information
- > Details of any support received, including care packages, plans and support providers
- > Photographs of your child
- > Carefully chosen and vetted educational apps
- > CCTV images

We may also hold data about pupils that we have received from other organisations, including other schools, local authorities and the Department for Education.

### 3. Why we use this data

We use this data to:

- > Support pupil learning
- > Monitor and report on pupil progress and attainment
- > Provide appropriate pastoral care
- > Protect pupil welfare
- > Assess the quality of our services
- > Administer admissions waiting lists
- > Keep you informed about the running of the trust and the schools within this (such as emergency closures)
- > Process payments for school services and clubs
- > Carry out research
- > Comply with the law regarding data sharing.

In order to meet statutory requirements around appropriate education provision and to fulfil safeguarding requirements, we share information about school history and the latest known pupil and parent address and contact details in the event of a Child Missing Education, or becoming Electively Home Educated. This information also supports the in-year admissions process.

#### 3.1 Collecting this information

While the majority of information we collect about pupils is mandatory, there is some information that can be provided voluntarily. Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

#### 3.2 How we store this data

Children's records are stored securely in paper files and on the school's secure server. We keep personal information about pupils while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. We will adhere to the Information Management Toolkit for Schools guidance on retention.

#### 3.3 Use of your personal data for marketing purposes

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

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).

#### 4. Use of your 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.

#### 5. Data sharing

We do not share information about pupils 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 the Data Protection Act 2018)

We may share personal information about pupils with:

- > Our local authority (e.g. admissions)
- > The Department for Education (e.g. attainment)
- > The pupil's family and representatives (e.g. attendance)
- > Educators and examining bodies (e.g. SATS test papers)
- > Our regulators Ofsted, DFE and the ESFA (e.g. pupil data)
- > Suppliers and service providers (e.g. sports coaches)
- > Central and local government (e.g. attainment)
- > Health authorities (e.g. immunisations)
- > Health and social welfare organisations (e.g. social services)
- > Professional advisers, bodies and consultants (e.g. Educational psychologist)
- > Police forces, courts, tribunals (in relation to safeguarding)
- > Collaborating schools for moderating purposes

#### 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. Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the Department 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 other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data. For more information, see the Department'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.

#### 6. Our legal basis for using this data

We only collect and use pupils' personal data when the law allows us to. Most commonly, we process it where:

- > We need to comply with a legal obligation
- > We need it to perform an official task in the public interest

We may also process pupils' personal data in situations where:

- > We have obtained consent to use it in a certain way
- > We need to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use pupils' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn. Some of the reasons listed above for collecting and using pupils' personal data overlap and there may be several grounds which justify our use of this data.

## 7. 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 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 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 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

## 8. Collecting this data

While the majority of information we collect about you 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 you will come from you, but we may also hold data about you from:

- > Local authorities
- > Government departments or agencies
- > Your children
- > Police forces, courts, tribunals

## 9. How we store this data

We keep personal information about you while your child is attending our school. We may also keep it beyond their attendance at our school if this is necessary. The Trust's Record Keeping and Retention Schedule, along with the Record Keeping Appendix – Retention Schedule, sets out how long we keep information about parents and carers.

The Trust's Record Keeping and Retention Schedule, along with the Record Keeping Appendix – Retention Schedule can be found on our school & trust websites.

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

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

### 9.1 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.

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. (see 'Contact us' below).

## 10. Parents and pupils' rights regarding personal data

### 10.1 How to access personal information that we hold about you

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them. Parents/carers can make a request with respect to their child's data where the child is under the age of 13, or where the child has provided consent. Parents also have the right to make a subject access request with respect to any personal data the school holds about them.

### 10.2 Your other rights regarding your data Under data protection law

Individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- > Object to the use of personal data if it would cause, or is causing, damage or distress
- > Prevent it being used to send direct marketing
- > Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- > In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- > Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our Data Protection Officer, Satswana Ltd.

## 11. 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 the school in the first instance. To make a complaint, please contact our Data Protection Officer, Satswana Ltd. Contact details are stated under the introduction to this policy.

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



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

This notice is based on the Department for Education's model privacy notice, amended to reflect the way we use data in this school.

## 12. Contact us

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 the school in the first instance. To make a complaint, please contact our Data Protection Officer on the following details:

Email: [info@satswana.com](mailto:info@satswana.com)

Telephone number: 01252 516898,

Office address: Pembroke House, St Christopher's Place, Farnborough, Hampshire, GU14 0NH.