



**Trust Wide**  
**Data Protection Privacy Notice for Pupils**

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GKA	Trust Board	February 2023	1.0	February 2024

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Abstract	
To be read in conjunction with the Data Protection Policy	

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February 2023	1.0	New	February 2023

For the purpose of this policy the following representatives need to sign off this document:	
Role/Department & Responsibilities	Name
Chair of Trust Board	Mike Reddy

Website:	
Yes/No	Yes

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This privacy notice is written in more child-friendly language, so it should be easier for pupils to understand. It's for pupils you consider capable of understanding and exercising their rights over their own data (generally considered to be age 12, but you'll need to consider this on a case-by-case basis). Use the **privacy notice for parents – use of your child's personal data** if you have children you don't consider capable of this, either alongside or instead of this notice.

## 1. Introduction

You have a legal right to be informed about how our school uses any personal information that we hold about you. To comply with this, we provide a 'privacy notice' to you where we are processing your personal data.

This notice explains how we collect, store and use personal data about **pupils at our school**, like you.

Our trust, Impact Education Trust, First Floor, Unit 12, Longbow Close, Pennine Business Park, Bradley, Huddersfield, HD2 1GQ, Telephone 01484 799321, is the 'data controller' for the purposes of UK data protection law.

Our data protection officer is Satswana and is contactable via email [Info@satswana.com](mailto:Info@satswana.com) or by calling 01252 516 898.

## 2. The personal data we hold

We hold some personal information about you to make sure we can help you learn and look after you at school.

For the same reasons, we get information about you from some other places too – like other schools, the local council and the government.

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

- Your contact details (name, unique pupil number, contact details and address)
- Your test results
- Your attendance records
- Details of any behaviour issues or suspensions / exclusions
- Safeguarding information
- Special educational needs (including the needs and ranking)
- Assessment and attainment (such as key stage 1 and phonics results, post 16 courses enrolled for and any relevant results)
- Trips and activities
- Catering

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to:

- Information about your characteristics, like your ethnic background or any special educational needs
- Any health conditions that we need to be aware of
- Information about any medical conditions you have
- Photographs and CCTV images

### **3. Why we use this data**

We use the data listed above to:

- a) Get in touch with you and your parents when we need to
- b) Support pupil learning - check how you're doing in exams and work out whether you or your teachers need any extra help
- c) Track how well the school as a whole is performing and to assess the quality of academy services
- d) Look after your wellbeing and keep children safe (food allergies or emergency contact details)
- e) Comply with our legal and statutory obligations
- f) Provide appropriate pastoral care

#### **3.1 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.

If this changes in the future, we will update this notice in order to explain the processing to you, including your right to object to it.

### **4. Our lawful basis for using this data**

Our lawful bases for processing your child's personal data for the purposes listed in section 3 above are as follows:

- For the purposes of a-f and h listed in section 3 above and in accordance with the 'public task' basis – we need to process data to fulfil our statutory function as an academy as set out here:
  - National School Admissions Code 2021

- Education Act 2011
- The Equality Act 2010
- SEND Code of Practice
- For the purposes of d, f and h, in accordance with the 'legal obligation' basis – we need to process data to meet our responsibilities under law as set out here:
  - National School Admissions Code 2021
  - Education Act 2011
  - The Equality Act 2010
  - SEND Code of Practice
- For the purposes of a-d and f, in accordance with the 'consent' basis – we will obtain consent from you or your parent/carer to use your child's personal data
- For the purposes of d, in accordance with the 'vital interests' basis – we will use this personal data in a life-or-death situation

We will only collect and use your information when the law allows us to. We need to establish a 'lawful basis' to do this.

Where you've provided us with consent to use your information, you may take back this consent at any time. We'll make this clear when requesting your consent, and explain how you'd go about withdrawing consent if you want to.

#### **4.1 Our basis for using special category data**

For 'special category' data (more sensitive personal information), 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 information in a certain way
- We need to use your information under 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 information has already been made obviously public by you
- We need to use it to make or defend against legal claims
- We need to use it for reasons of substantial public interest as defined in legislation
- We need to use it for health or social care purposes, and it's used by, or under the direction of, a professional obliged to confidentiality under law
- We need to use it for public health reasons, and it's used by, or under the direction of, a professional obliged to confidentiality under law
- We need to use it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the use 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 obviously public by you
- We need to use it as part of legal proceedings, to obtain legal advice, or to make or defend against legal claims
- We need to use it for reasons of substantial public interest as defined in legislation

## 5. Collecting this data

While most of the information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we want to collect information from you, we make it clear if you have to give us this information (and if so, what the possible consequences are of not doing that), or if 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
- Police forces, courts, tribunals
- CAMHS/NHS
- LA
- Fire Service

## 6. How we store this data

We keep personal information about your child while they are attending our academy. We may also keep it beyond their attendance at our academy if this is necessary. Our records and retention schedule sets out how long we keep information about pupils.

If you would like to request a copy of our records and retention schedule, and receive more details on how we store personal data, please contact the Trust by emailing:

[admin@i-mat.org.uk](mailto:admin@i-mat.org.uk)

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 don't share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it's legally required, or necessary (and it complies with UK data protection law), we may share personal information about you with:

- Our local authorities– to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions
- Government departments or agencies including the Department for Education – to meet requirements linked to school census returns

Our youth support services provider - Pupils aged 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 as follows:

- youth support services
- careers advisers

**Data is securely transferred to the youth support service via [insert method used] and is stored [insert storage] and held for [insert data retention period].**

- Careers advisers – in relation to responsibilities to the education and training of 13-19 years old under section 507B of the Education Act 1996.
- Our regulator, Ofsted
- Suppliers and service providers
- Financial organisations
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals



## **National Pupil Database**

We have to provide information about you to the Department for Education (a government department) as part of data collections such as the school census.

Some of this information is then stored in the [National Pupil Database](#), which is managed by the Department for Education and provides evidence on how schools are performing. This, in turn, supports research.

The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards and others.

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

You can find more information about this on the Department for Education's webpage on [how it collects and shares research data](#).

You can also [contact the Department for Education](#) if you have any questions about the database.

## **7.1 Transferring data internationally**

The Trust and its academies do not transfer data internationally.

## **8. Your rights – requesting access to your personal data**

### **8.1 How to access personal information that we hold about you**

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

If you make a subject access request, and if we do hold information about you, we will (unless there's a really good reason why we shouldn't):

- Give you a description of it
- Tell you why we are holding and using it, and how long we will keep it for
- To have your personal data rectified, if it is inaccurate or incomplete
- To request the deletion or removal of personal data where there is no compelling reason for its continued processing
- 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 (decisions made by a computer or machine, rather than by a person), and any consequences of this
- Give you a copy of the information in an understandable form

- To restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- To object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics

You may also have the right for your personal information to be shared with another organisation in certain circumstances.

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

## 8.2 Your other rights regarding your data

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

- Say that you don't want your personal information to be used
- Stop it being used to send you marketing materials
- Say that you don't want it to be used for automated decisions (decisions made by a computer or machine, rather than by a person)
- In some cases, have it corrected if it's inaccurate
- In some cases, have it deleted or destroyed, or restrict its use
- Withdraw your consent, where you previously provided consent for your personal information to be collected, processed and transferred for a particular reason
- In some cases, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation if the data protection rules are broken and this harms you in some way

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

## 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 concerns about our data processing, please let us know first.

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**:

Our data protection officer is Satswana and is contactable via email [Info@satswana.com](mailto:Info@satswana.com) or by calling 01252 516 898.

## 11. Links to other policies

- 1.1. Data Protection Policy
- 1.2. Records and retention schedule

Sign off	
Adopted by IMPACT Trust Board on:	
Chair of IMPACT Trust Board:	
IMPACT Board Trustee:	
Next Review Date :	