



Primary Cluster Privacy notice for students and their families

Review

Reviewed on: 26 May 2023

Reviewed by: Board

Review Period: Annual



Privacy notice – how the school uses pupil information

What categories of information are processed?

The categories of personal information that we process include the following:

- **Personal identifiers and contacts** – e.g. name, unique pupil number, contact details and address
- **Characteristics** – e.g. ethnicity, language and eligibility for free school meals
- **Safeguarding information** – e.g. court orders and professional involvement
- **Special educational needs and disabilities (SEND) information** – e.g. any needs you have
- **Medical and administration** – e.g. doctors' information, your health, allergies, medication and dietary requirements
- **Attendance** – e.g. sessions attended, number of absences, reasons for absences and any previous schools you have attended
- **Assessment and attainment** – e.g. any relevant test and exam results
- **Behavioural information** – e.g. exclusions and any relevant alternative provision **put in place**
- **Biometric data - thumbprints for cashless catering, printing, etc**
- **CCTV**

Why do we collect and use your information?

We collect and use your information for the following reasons:

- To support pupil learning
- To monitor and report on pupil attainment and progress
- To provide appropriate pastoral care
- To assess the quality of our services
- To keep pupils safe
- To meet legal duties placed on us by the government

Under the GDPR, the legal basis/bases we rely on for processing personal information for general purposes are:

We collect and use student information under the basis of 'public task' (Article 6 of GDPR). This means that as a school we are using information about you in order to be able to provide you with the best education that we can. We may use more sensitive information about you (article 9 of GDPR) in order to fulfil our obligations to the DfE, social services, police, NHS and organisations to provide pastoral support. For any information which does not fall within the above, for example, taking photos of you, or taking your thumbprint, we will ask your consent.

How do we collect your information?

We collect your personal information via the following methods:

- Admission forms
- Common Transfer File (CTF) from your previous school
- Child protection plans

How do we store your information?

We hold your personal information securely for the set amount of time, dependent on the type of information, usually between 6 and 25 years.

Who do we share your information with?

We routinely share your information with:

- The LA
- The DfE
- Schools that you go to after leaving us
- Youth support services
- NHS
- Educational websites

For a complete list of the organisations we share data with, please visit our website:

[Athena Learning Trust](#)

Why do we share your information?

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

Youth support services

Once our pupils reach the age of 13, we also pass pupil information to our local authority (LA) and/or provider of youth support services because they have responsibilities in relation to the education or training of 13 to 19-year-olds under section 507B of the Education Act 1996.

Sharing this information allows them to provide the following services:

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

The information we share is limited to the pupil's name, address and date of birth; however, where a parent has provided their consent, other relevant information will be shared – this right to consent is transferred to pupils once they reach 16-years-old.

Department for Education (DfE)

The DfE collects personal information from us through various collections the school is required to undertake legally. We are required to share information about pupils with the DfE either directly or via our LA for the purpose of those data collections, under Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

All information we share with the DfE is transferred securely and held by the DfE under a combination of software and hardware controls which meet the current [government security policy framework](#).

How does the government use your data?

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 evidence on educational performance to inform independent research as well as studies commissioned by the DfE.

Information on the NPD is held in an electronic format and it is securely collected from a range of sources, including schools, LAs and awarding bodies.

You can find out more about the NPD by following this link:

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

Sharing by the DfE

The DfE is legally allowed to share pupils' personal information with certain third parties, including the following:

- Schools
- LAs
- Researchers
- Organisations connected with promoting the education or wellbeing of pupils
- Other government departments and agencies
- Organisations fighting or identifying crime

Organisations fighting or identifying crime, such as the Home Office and the police, may use their legal powers to contact the DfE to request access to individual level information relating to a crime. The DfE typically supplies information on around 600 pupils per year to the Home Office and approximately one per year to the police.

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/dfе-external-data-shares>

How to find out what personal information the DfE holds about you

Under the Data Protection Act 2018, you are entitled to ask the DfE what personal information it holds about you. You have the right to ask the DfE:

- If it processes your personal data.
- For a description of the data it holds about you.
- The reasons it is holding your data and any recipient it may be disclosed to.
- For a copy of your personal data and any details of its source.

To exercise these rights, you should make a subject access request. Information on how to do this can be found 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>



What are your rights?

You have specific rights to the processing of your data, these are the right to:

- Request access to the information the school holds about you.
 - Restrict our processing of your personal data, i.e. permitting its storage but no further processing.
 - Object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics.
 - Have your personal data rectified if it is inaccurate or incomplete.
 - Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.
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- Request the deletion or removal of personal data where there is no compelling reason for the continued processing.
 - Seek compensation, either through the ICO or the courts.

If you want to request access to the personal information that we hold about you, please contact: gfahey@athenalearningtrust.uk

If you are concerned about the way we are collecting or using your information, please raise your concern with the school's DPO in the first instance. You can also contact the ICO: [Make a complaint | ICO](#)

How to withdraw consent and lodge complaints

Where our school processes your personal data with your consent, you have the right to withdraw your consent.

If you change your mind or are unhappy with how our school uses your personal data, you should let us know by contacting: gfahey@athenalearningtrust.uk

How can you find out more information?

If you would like to discuss anything in this privacy notice, please contact: gfahey@athenalearningtrust.uk

If you require further information about how we and/or the DfE store and use your personal data, please visit our Trust website, [Athena Learning Trust](#), or the Gov.UK [website](#).