

## Privacy notice for pupils/students

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

This privacy notice explains how we collect, store and use personal data about you.

We, Together Learning Trust, are the 'data controller' for the purposes of data protection law.

Our Data Protection Officer (DPO) is Mrs Janine Webb. Our DPO is supported by a nominated Senior Leader for Data Protection within each school. See "Contact us" section below.

### 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. This information includes:

- Your contact details and personal information (such as name, unique pupil number and address)
- Emergency contact details
- Your examination results, assessment and attainment information
- Your attendance information (such as sessions attended, number of absences and absence reasons including exclusions)
- Your characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Medical information (any relevant medical conditions or treatments and a log of any incidents/illnesses that we are aware of and occurred at school, dietary requirements, doctors information)
- Behaviour information (record or behaviour events as per the Behaviour for Learning Policy, exclusions)
- SEND (record of any Special Educational Needs or Disability, along with associated observations, strategies and learning plans)
- Safeguarding information (such as court orders and professional involvement)
- Information on the use of the internet and ICT resources to ensure safe and appropriate use of resources
- Photographs
- CCTV images

### Why we use this data

We use this data to help run the school, including to:

- Get in touch with you and your parents when we need to
- To support student learning
- Track how well the academy as a whole is performing
- Look after your wellbeing

### Our lawful basis for using this data

We will only collect and use your information when the law allows us to. Most often, we will use your information where:

- We need to comply with the law
- We need to use it to carry out a task in the public interest (in order to provide you with an education)

Sometimes, we may also use your personal information where:

- You, or your parents/carers have given us permission to use it in a certain way
- We need to protect your interests (or someone else's interest)

Where we have got permission to use your data, you or your parents/carers may withdraw this at any time. We will make this clear when we ask for permission, and explain how to go about withdrawing consent. Some of the reasons listed above for collecting and using your information overlap, and there may be several grounds which mean we can use your data.

Where we process special category data we will identify both a lawful basis and a separate condition for processing under UK GDPR Article 9.

### **Collecting this information**

While in most cases you, or your parents/carers, must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data. We will always tell you if it's optional. If you must provide the data, we will explain what might happen if you don't.

### **How we store this data**

We will keep personal information about you while you are a student at our academy. We may also keep it after you have left the academy, where we are required to by law. We have a Records Management Policy / Record Retention Schedule which sets out how long we must keep information about students. This is available online from the academy website or from the Trust Central Team in hard copy (see 'Contact Us' below)

### **Data sharing**

We do not share personal information about you with anyone outside the school without permission from you or your parents/carers, unless the law and our policies allow us to do so. Where it is legally required, or necessary (and it complies with data protection law), we may share personal information about you with:

- Our local authority – to meet our legal duties to share certain information with it, such as concerns about students' safety and exclusions
- The Department for Education (a government department) – to meet statutory obligations to provide them with information, especially with regard to data returns such as census.
- Your family and representatives – in case of emergencies such as a health matter and as necessary in the performance of our education function
- Educators and examining bodies – as necessary in the performance of our education function
- Our regulator (the organisation or "watchdog" that supervises us), Ofsted – to enable it to evaluate the education we provide, which is in the public interest
- Suppliers and service providers – so that they can provide the services we have contracted them for
- Financial organisations – so that they can provide the services we have contracted them for
- Central and local government – to meet statutory obligations and legal duties to provide them with information
- Our auditors – to demonstrate that we have taken appropriate action in providing your education
- Health authorities – to comply with our legal and statutory obligations, with investigations and to support legal entitlements
- Security organisations – with regard to legal or safeguarding investigations and to assist in crime prevention, detection and prevention of fraud
- Health and social welfare organisations – to enable us to comply with our duty of care and statutory safeguarding duties for your wellbeing
- Professional advisers and consultants – to comply with entitlements and assist with claims
- Police forces, courts, tribunals – in order to uphold law and order
- Professional bodies – to verify information for legal purposes

### **National Pupil Database**

We are required 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 which 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.

## **Youth support services**

### **Pupils aged 13+**

Once you reach the age of 13, we are legally required to pass on certain information about you to our local authority and/or provider of youth support services, as they have legal responsibilities regarding the education or training of 13-19 year-olds. This information enables them to provide youth support services, post-16 education and training services, and careers advisers. Your parents/carers, or you once you're 16, can contact your schools office to ask us to only pass your name, address and date of birth to our local authority and/or provider of youth support services.

### **Pupils aged 16+**

We will also share certain information about pupils aged 16+ with 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:

- post-16 education and training providers
- youth support services
- careers advisers

Data is securely transferred to the youth support service and is held in line with our data retention schedule.

For more information about services for young people, please visit our local authority website.

## **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.

## **Your rights**

### **How to access the personal information we hold about you**

You can find out if we hold any personal information about you, and how we use it, by making a 'subject access request', as long as we judge that you can properly understand your rights and what they mean.

If we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and using it, and how long we will keep it for
- Explain where we got it from, if not from you or your parents
- Tell you who it has been, or will be, shared with

- Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)
- Give you a copy of the information

You may also ask us to send your personal information to another organisation electronically in certain circumstances.

If you would like to make a request, please contact your school office in the first instance.

### **Your other rights regarding your data**

You have other rights over how your personal data is used and kept safe, including the right to:

- Say that you don't want it to be used if this would cause, or is causing, harm or distress
- Stop it being used to send you marketing materials
- Say that you don't want it used to make automated decisions (decisions made by a computer or machine, rather than by a person)
- Have it corrected, deleted or destroyed if it is wrong, or restrict our use of it
- Claim compensation if the data protection rules are broken and this harms you in some way

### **Complaints**

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we've done something wrong.

To make a complaint, please contact the designated school contact in the first instance.

You can also complain to the Information Commissioner's Office in one of the following ways:

- 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

### **Contact us**

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact the senior leader responsible for Data Protection in the relevant school. Alternatively, you can also contact the Central Trust Team for further information:

**Bolton Brow Primary Academy:** 01422 831031

Paul Kelesidis – Headteacher

**Honley High School:** 01484 506484

Amanda Haigh – School Business Manager

**Meltham Moor Primary School:** 01484 859032

Liz Woodfield - Headteacher

**Netherton Infant and Nursery School:** 01484 661832

Emma Barker - Headteacher

**Ryburn Valley High School:** 01422 832070

Mark Thorley – Business and Compliance Manager

**Brooksbank School:** 01422 374391

Nicola Davies – Business and Compliance Manager

**Together Learning Trust Central Team, Data Protection Officer:** 01422 483355

Janine Webb - Director of Business, Operations and Compliance

## **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 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.

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.

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/dfе-external-data-shares>.

## **How to find out what personal information DfE hold about you**

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

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

If you want to see the personal data held about you 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>.