



Privacy Notice - Pupils

This privacy notice is issued to parents and carers in addition to pupils where pupils are not yet capable of understanding and exercise their rights over their own data (generally considered to be age 12, but this will be considered on a case-by-case basis).

1. Introduction

You have a legal right to be informed about how our school (which is part of the Nene Education Trust) 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 schools, like you. Our Trust is the 'data controller' for the purposes of UK data protection law.

Nene Education Trust
Waterside House
Station Road
Irthlingborough
NN9 5QF
Tel: 01933 627081

If you would like to contact us about the personal data and information, we hold on your behalf please contact our Data Protection Officer:

Angela Corbyn
Email: dpo@neneeducationtrust.org.uk
Tel: 07775 436141

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 – such as 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:

- Contact details, preferences and personal information such as name, email, phone number, address, date of birth, gender, country of birth and identification documents
- Information about free school meal and pupil premium eligibility
- Information for catering management purposes
- Results of internal assessments and externally set tests
- Pupil and curricular records including attendance and education records
- Behaviour and pastoral records

- Information relating to payments, school clubs, activities and trips which will include things such as consent records (where applicable), invoices and payments
- Exclusion information
- Safeguarding information individual details on concerns
- Details of any support received, including care packages, plans and support providers
- Family information which will include siblings, parents and any court orders in place
- Accident and first aid records
- Complaint records
- Photographs, CCTV footage and images obtained when you attend the school site
- We may also hold data about pupils that we have received from other organisations, such as other schools, local authorities and the Department for Education.

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:

- Characteristics (such as ethnicity and religion)
- Any special educational needs
- Information about any medical and health conditions you have which includes allergies and dietary needs
- Biometric information – only relevant to Manor

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

3. Why we use this data

We use the data listed above to:

- Get in touch with you and your parents or carers when we need to
- Support pupil learning
- Check how you're doing in exams and work out whether you or your teachers need any extra help
- Track how well the school as a whole is performing
- Look after your wellbeing and keep you safe
- Comply with the law regarding data sharing
- Carry out research

3.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you messages by email or text promoting school events, campaigns, charitable causes, or services that you might be interested in.

You can take back this 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 the school office.

3.2 Use of your personal data in automated decision making and profiling

We don't currently put pupils' personal data through any automated decision making or profiling process. This means we don't make decisions about you using only computers without any human involvement.

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 personal information for the reasons listed in section 3 above are: We only collect and use pupils' personal data when the law allows us to (Article 6 for personal information and Article 9 of the UK GDPR for special category data). 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

Less commonly, 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 vital 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.

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 1 of the following conditions for processing as set out in UK data protection law:

- We have got 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 got 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 (i.e. you have to give us the information), there is some information that you can choose whether or not to give us.

Whenever we want to collect information from you, we make it clear whether you have to give us this information (and if so, what the possible consequences are of not doing that), 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 councils and previous schools
- Government departments or agencies
- Police forces, courts or tribunals

6. How we store this data

We keep personal information about pupils while they are attending our schools. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. Personal data is stored in accordance with the Trust Data Protection Policy and the Trust Records Management Policy. If you would like to see a copy, please visit the Trust website: <https://neneeducationtrust.org.uk>.

We have put in place appropriate security measures to prevent pupil personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed. We will dispose of pupil'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 authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions
- Government departments or agencies such as DfE
- The pupil's family and representatives
- Schools that the pupils attend after leaving us
- Educators and examining bodies

- Our regulator, Ofsted
- Suppliers and service providers who we contract to support us in our legal duties to educate and safeguard pupils – to enable them to provide the service we have contracted them for

This will include:

- Financial organisations and auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations the school works with
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts or tribunals
- Catering Contractors – where pupils have meals provided by them
- We share pupil personal information with a 3rd party in order to send parents/carers text messages and emails from the school
- Charities & voluntary organisations with whom we have a working relationship

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

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

8. Your rights

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
- 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

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 the Data Protection Officer via contact details provided on page 1.

8.2 Your other rights regarding your data

Under 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

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 or concerns, or would like more information, please contact our Data Protection Officer:

Angela Corbyn
Email: dpo@neneeducationtrust.org.uk
Tel: 07775 436141

Or our Trust GDPR Lead for general GDPR queries:

Victoria Brennan
Email: vbrennan@neneeducationtrust.org.uk
Tel: 01933 400549