



## Privacy notice for 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 has to be considered on a case-by-case basis).

As a pupil of the school, it is part of the Multi Academy Trust called Nene Education Trust. The Trust is the organisation who are in charge of your personal information (or personal data). This means the Trust is called the Data Controller.

The postal address of the Trust is:

**Nene Education Trust**  
**Mountbatten Way**  
**Raunds**  
**Wellingborough**  
**Northants NN9 6PA**

Tel: **01933 627081**

Email: [enquiries@neneeducationtrust.org.uk](mailto:enquiries@neneeducationtrust.org.uk)

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**:

Tel: **07775 436141** Email: [dpo@neneeducationtrust.org.uk](mailto:dpo@neneeducationtrust.org.uk).

**or leave a letter at the address above.**

Under data protection law, individuals have a right to be informed about how the Trust and school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' to individuals where we are processing their personal data. This privacy notice explains how we collect, store and use personal data about pupils.

### **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:

- Contact details, contact preferences, date of birth and identification documents
- Characteristics (such as gender, ethnicity and language)
- information about free school meal and pupil premium eligibility
- information for catering management purposes (e.g. whether you have school dinners and how often);
- Results of internal assessments and externally set tests
- Pupil and curricular records including attendance
- Exclusion information
- Safeguarding information



- Details of any support received, including care packages, plans and support providers
- Photographs

We may also collect, use, store and share (when appropriate) information about pupils 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
- Details of any medical conditions, including physical and mental health
- Photographs and 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.

### **Why we use this data**

We use this personal data to:

- support pupil learning;
- monitor and report on pupil progress;
- provide appropriate care for our pupils;  provide pastoral care and for the purpose of pupil welfare;
- assess the quality of our services;
- keep pupils safe (food allergies, or emergency contact details)
- comply with the statutory duties placed on us.

### **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:

- The Trust is under a legal obligation to collect the information or the information is necessary for us to meet legal requirements imposed upon us such as our duty to safeguard pupils.
- It is necessary for us to hold and use pupil information for the purposes of our functions in providing schooling and so we can look after our pupils. This is a function which is in the public interest because everybody needs to have an education.
- There is a substantial public interest in processing pupil's information because it is necessary to keep our pupils safe from harm.

We will not usually need your consent to use pupil information. However, if at any time it appears to us that we would like to use pupil's personal data in a way which means that we would need your consent then we will explain to you what we want to do and ask you for consent (for example, for some uses of photographs).

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.



Whilst the majority of processing of personal data we hold about you will not require your consent, we will inform you if your consent is required and seek that consent before any processing takes place.

#### **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 data protection law:

- We have obtained your explicit consent to use your information in a certain 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 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

#### **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.

The majority of data we obtain will be provided by you by way of information gathering at certain times, such as when your child joins the Trust/school and when you visit the Trust site, this also includes visitor logs and images captured on CCTV. Other details may also be obtained from other sources such as details from the local authority, other professional bodies ie a Court which may raise a concern about the pupil.

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

We keep personal information about pupils while they are attending one of our Trust schools. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. Our Record Retention Policy sets out how long we keep information about pupils.

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

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

## 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 data protection law) we may share personal information about pupils with:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
- The Department for Education
- The pupil's family and representatives
- Educators and examining bodies
- Our regulator Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Financial organisations
- Central and local government
- 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
- Professional bodies

The information disclosed to these people / services will include sensitive personal information about pupils. Usually this means information about a pupil's health and any special educational needs or disabilities which they have. We do this so that pupils can receive the necessary support.

## 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.

## 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.

## Pupils' rights regarding personal data

Individuals have a right to make a 'subject access request' to gain access to personal information that the academy holds about them. Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

If you make a subject access request, and if we do hold information about you or your child, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- 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, and any consequences of this
- Give you a copy of the information in an intelligible form

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request please contact our data protection officer.

*There is no automatic parental right of access to the educational record of the child (children) at the Nene Education Trust but the Trust will agree to this request upon receipt of a written request confirming the information required. Nene Education Trust will take all reasonable steps to provide this information within 15 working days of receiving the request. A payment of £20.00 will be required in advance to cover the administrative costs of processing this request. Requests should be forwarded to the Principal of the appropriate school.*

## Other rights

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.

## 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 us in the first instance.

To make a complaint, please contact our data protection officer.

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

## 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:

**Angela Corbyn on 07775 436141. Or email [dpo@neneeducationtrust.org.uk](mailto:dpo@neneeducationtrust.org.uk). Or leave a letter at our offices at the address above.**

Nene Education Trust UK - GDPR queries please contact:-  
Victoria Brennan 01933 400549  
[vbrennan@neneeducationtrust.org.uk](mailto:vbrennan@neneeducationtrust.org.uk)

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