



GREENWOOD ACADEMIES TRUST

Privacy Notice for Pupils, Parents and Carers

Version: 10.0 Approval Status: Approved

Document Owner:	Corporate Affairs Director
Reviewed:	1 September 2023

Introduction

Under data protection law you have a right to be informed about how we use any personal data that is held about our pupils and parents/carers. This privacy notice is designed to provide you with that information and to make sure that we, the Greenwood Academies Trust (GAT), and our academies, are complying with the law.

Our Trust is the data controller for the purposes of UK data protection law; we are therefore the organisation in charge of how your personal information is collected and used.

The Trust Data Protection Officer (DPO) is Alison Hope, who can be contacted on:

dataprotection@greenwoodacademies.org

The Personal Data We Hold

We hold personal information on all pupils at all our Academies, to make sure we can help you learn and look after you in school; this includes children who are defined in law as children in need or those who are looked after by the Local Authority (LA). For the same reasons, we also collect information from other places, such as other schools, the local authority and the government.

We also collect personal information on parents and carers.

Why do we collect and use your information?

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

- **Personal information** – your name, unique pupil number, address and contact details, email address, details of your family circumstances, finance and bank details
- **Your characteristics** – such as ethnicity, language, nationality, country of birth and religion
- **Attendance information** – such as the number of sessions attended and reasons for absence
- **Test results** – including national curriculum assessments, internal examination results
- Special educational needs information and free school meal eligibility
- Information about any relevant medical conditions or needs you may have
- Details of any behaviour issues or exclusions
- Other information, including photographs, images on CCTV and biometric data (in some cases).

Why we Use this Data

We use this information to help run our academies, including to:

- Support your learning
- Look after your well-being
- Check how you are doing in examinations and work out if you need extra help
- Report on your progress and attainment to parents and carers
- Get in touch with you when we need to
- Track how well the Academy is doing
- Provide pastoral care
- Protect vulnerable individuals

- Prevent and detect crime
- Provide references for employment
- Process payments for school services and clubs
- Comply with our legal and statutory obligations

Our Lawful Basis for Using this Data

We will only collect and use your information when the law allows us to. We need to establish a 'lawful basis' to do this. These bases for processing your personal information are:

- We need it to comply with the law
- We need it to carry out a task in the public interest (this includes providing you with an education and is in line with Article 6 of the GDPR)

Sometimes we will also use your personal information where:

- You have given us permissions (or consent) to use it in a particular way
- We need to protect your (or someone else's) health interests.

Where you have provided us with consent to use your information, you may take back this consent at any time. We will make this clear when requesting your consent and explain how you would go about withdrawing it.

Some of our reasons for using data overlap and there may be several reasons that justify our use of your information.

Collecting the Information

In most cases, you will provide the information we use but sometimes you can choose whether to give it to us or not. We can also get information from previous schools, the Department for Education (DfE) or the local authority.

If you are a pupil over the age of 14 when you enrol with us, the Learning Records Service will also give us the unique learner number (ULN) and may also give us details about your qualifications.

We will always tell you if you have a choice about whether to provide information; if you do not have a choice, we will also explain what will happen if you do not provide it.

How we Store the Data

We will keep personal information about you while you are a pupil (or a parent/carer of a pupil) at one of our academies. We will also keep it after you have left where we are required to by law. Our Trust [Records Management Policy](#) sets out how long we keep information; we may keep information about you in a variety of formats, including on paper, electronically or in the form of video or audio recordings.

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 will also dispose of your data securely when we no longer need it.

Data Sharing

We will not share personal information about you with any third party without your permission unless the law and our policies allow us to.

Where it is legally required, or necessary for another reason under data protection law, we may share personal information about you with:

- The local authority, to meet our legal obligations in areas such as safeguarding
- The DfE, to meet our legal obligations in areas such as the School Census
- Our regulator, Ofsted
- Your family or representatives in case of emergencies, such as a health matter
- Schools or educational institutions you may move on to, in the interests of continuing to deliver the public interest of providing education
- Youth Support Services, as they have legal responsibilities regarding the education and training of 13–19-year-olds
- Other education organisations and examination boards, where this is necessary for the purposes of providing education
- Suppliers and service providers, to enable them to provide the service for which they are contracted by us
- Health and welfare organisations, to enable us to comply with our statutory duties regarding care and safeguarding, including:
 - Therapists and/or clinical psychologists
 - Medical or counselling staff within the Academy
 - CAMHS (Children and Adolescent Mental Health Services)
 - Social care
 - Education welfare officers (EWOs).
- Police forces, courts, or tribunals, to uphold law and order.

Department for Education

We are required to provide information about you to the DfE as part of data collections such as the School Census. To find out more about the information we are required to share please go to: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

Some of this information is then stored in the National Pupil Database, which is managed by the DfE and provides information on how schools are performing. The data is held electronically so that it can be turned into statistics. The information it holds is collected securely from schools, local authorities, examination boards and others.

The DfE 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 regarding how they use your data.

For more information about the DfE's data sharing process, please visit:

<https://www.gov.uk/dataprotection-how-we-collect-and-share-research-data>.

To contact the DfE please visit <https://www.gov.uk/contact-dfe>.

Youth Support Services

Once a pupil reaches the age of 13, we are legally required to pass on certain information about them to the local authority or youth support services provider in your area as it has legal responsibilities regarding the education and training of 13 to 19-year-olds. This information enables them to provide youth support services, post-16 education and training services and careers advice.

If you (once you are 16 or over) or your parent/carer do not wish this information to be passed on, you can contact us to tell us that you do not wish this information to be shared. You can do this by contacting the Data Protection Lead at your Academy.

Transferring Data Internationally

If we need to share information about you with an organisation that is based outside the European Economic Area (EEA), we will protect your data by following data protection law. In practice, this would only happen if a parent lives abroad or if you move to a school outside the EEA. If this happens, we will take extra steps to ensure that we can transfer your data securely. We will, for example, look at whether the country in question has good data protection laws. If we cannot be sure, then we will talk to you to make sure you are happy for us to transfer the information.

We will always tell you if we feel we have a need to transfer any information about you internationally.

Photographs and Media

We may take photographs of pupils during normal Academy activities. We will always make you aware when this is happening and tell you the reason why photographs are being taken.

In most cases, we will only use the photographs for purposes related to your education, such as the compilation of class lists, or your identification on items such as security passes. In such cases, there is a clear lawful basis for doing so in pursuit of the public interest and providing you with an education.

We may also use the photographs (without your name attached) in materials for our website, for prospectuses or for Academy displays. If you and/or your parent/carer do not wish your photographs to be used for this purpose, you will have the opportunity to tell us this when you join the Academy. You can change your mind about this at any point by contacting the DPL in your Academy.

If we want to use the photographs for any other reason, we will make sure you know the reason why and seek your permission to do so.

Many of our academies operate CCTV systems – you can find more information about how we use these in the 'CCTV' section of our Data Protection Policy.

Under GDPR guidelines, children aged 13 or over are able to provide their own consent for the processing of personal data (including subject access requests, photographs etc). It is Trust policy to apply this for pupils in Year 9 and above. Therefore, for pupils in that year group and above, consent will be sought directly from you as the data subject.

Biometric Data

In some of our academies, we use biometric data in automatic systems relating to security. All such data will be processed in accordance with the General Data Protection Regulation and the Protection of Freedoms Act (2012). We will only use your biometric information if we have the written consent of one or more of your parents/carers.

Your Rights

We only keep your information for as long as we need to or for as long as the law requires us to. As a pupil, most of the information we have about you will be in your pupil file. We usually keep these until your 25th birthday unless you move to another school, in which case we send your

file to your new school. You can find out more about how long we keep information in the Trust [Record Management Policy](#).

You have other rights in relation to your personal data:

- You can ask us for a copy of the information we have about you by making a 'subject access request' to your Academy or the Trust DPO
- You can ask us to correct any information we have about you if you think it is wrong
- You can ask us to erase information about you (although there may be a good reason why we cannot always do this)
- You can ask us to limit what we do with your information (again, we may not always be able to agree to limit what we do if there is a legal reason why we cannot)
- You can object to what we are doing with your information
- You can ask us to transfer your information to another organisation in a format that makes it easy for them to use.

You can find out more information about these rights in our Trust Data Protection Policy

Contact and Complaints

If you have any concerns about our data processing, please contact the Trust DPO in the first instance by emailing dataprotection@greenwoodacademies.org

If you have a complaint about how we are handling your personal data, you should address it using our Trust Complaints Policy, available on your Academy website.

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

- www.ico.org.uk/concerns
- Call 0303 123 1113
- Write to the Information Commissioner's Office, Wycliffe House, Water Lane, WILMSLOW SK9 5AF.