GDPR Pupil Privacy Notice 2021/22

WHO WE ARE

Exceed Learning Partnership Trust and its Academies gather and process personal information in accordance with this privacy notice and in compliance with the relevant data protection regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process personal data.

Exceed Learning Partnership's registered office is at Hill Top Academy and we are a company registered in England and Wales under company number 10660150. Exceed Learning Partnership is registered on the Information Commissioner's Office Register, registration number ZA245663 and act as the data controller; certain staff within the academies will be data processors when processing your data. Exceed Learning Partnership's designated Data Protection Officer is Lorraine Burton, who will work with the appointed Chief Privacy Officer from each of the academies within Exceed Learning Partnership.

Exceed Learning Partnership is a Data Controller for the purposes of Data Protection Law[1]. This means the Trust/Academy determines the purposes for which, and the manner in which, an individual's personal data is processed.

WHAT THIS POLICY IS FOR

This policy is intended to provide information about how the Trust/Academy will use (or "process") personal data about individuals, including current, past and prospective pupils and their parents, carers or guardians (referred to in this policy as "parents").

This information is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used. The Academy's parents and pupils are all encouraged to read the Privacy Notice and understand the Trust's/Academy's obligations.

The Privacy Notice applies alongside any other information the Trust/Academy may provide about a particular use of personal data, for example when collecting data via an online or paper form.

WHY THE TRUST/ACADEMY NEED TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to staff, pupils and parents, the Trust/Academy may process a wide range of personal data about individuals as part of its daily operation. Some of this activity the Trust/Academy will need to carry out in order to fulfil its legal rights, duties or obligations. We will never collect any unnecessary personal data from you and do not process your information in any way, other than as specified in this notice.

The Academy holds the legal right to collect and use personal data relating to individuals, in order to meet legal requirements and legitimate interests set out in the GDPR and UK law, including those in relation to the following:

- Article 6 and Article 9 of the GDPR
- Education Act 1996

In accordance with the above, we use data relating to pupils and their families for the following reasons:

- To support pupil learning
- To monitor and report on pupil progress
- To provide appropriate pastoral care
- To assess the quality of our service
- To comply with the law regarding data sharing
- To safeguard pupils

TYPES OF PERSONAL DATA INCLUDING SENSITIVE PERSONAL DATA COLLECTED AND PROCESSED BY THE TRUST OR ITS ACADEMIES

This will include:

- Personal information – e.g. names, unique pupil numbers, addresses, telephone numbers, date of birth, e-mail addresses
- Characteristics – e.g. ethnicity, language, nationality, country of birth and free school meal eligibility
- Admission and attendance information (such as sessions attended, number of absences and absence reasons)
- Pupil Progress (such as assessment information, Special Educational Needs, Behavioural information)
- Relevant health and medical information, including contact details for next of kin

HOW THE TRUST/ACADEMIES COLLECT DATA

Generally, the Trust/Academy receives personal data from the individual directly (including, in the case of pupils, from their parents). This may be via a form or simply during the ordinary course of interaction or communication. In some cases, personal data may be supplied by third parties (for example another Academy/School, the Local Authority or other professionals or authorities working with the individual).

Whilst the majority of the personal data you provide to the Trust or its Academies is mandatory, some of it is provided on a voluntary basis. When collecting data, the Trust or its Academies will inform you whether you are required to provide this data or if your consent is needed. Where consent is required, the Trust or its Academies will provide you with specific and explicit information with regards to the reasons the data is being collected and how the data will be used.

HOW LONG WE KEEP PERSONAL DATA

In accordance with the GDPR, the Trust/Academies do not store personal data indefinitely; data is only stored for as long as is necessary to satisfy the purpose for which it was collected. The Trust's GDPR Data Retention Policy identifies how long personal data is stored for.

CCTV

Carr Lodge Academy operates CCTV on site as it is considered necessary to protect pupils' safety and/or the academy's property. Images are stored for the required period and then erased.

WHO HAS ACCESS TO PERSONAL DATA AND WHO DOES THE TRUST OR ITS ACADEMIES SHARE INFORMATION WITH

Exceed Learning Partnership takes your privacy very seriously and will never disclose or share your data without your consent, unless required to do so by law. We will only retain your data for as long as is necessary and for the purpose(s) specified in this notice. Where you have consented to us providing you with information relating to school photo's you are free to withdraw this consent at any time.

For the most part, personal data collected by the Trust or its Academies will remain within the Trust/Academy, and will be processed by appropriate individuals only in accordance with access protocols.

The Trust or its Academies routinely shares information with:

- Schools that pupils attend upon leaving us
- Our Local Authority
- The NHS, Health and Social Care Professionals
- The Department for Education (DfE)
- Our Multi Academy Trust – Exceed Learning Partnership

SAFEGUARDING MEASURES

In accordance with Data Protection Law, some of the Trust's/Academies' processing activity is carried out on its behalf by third parties, such as IT systems, web developers, cloud storage and social media providers. Where possible this is subject to contractual assurances that personal data will be kept securely and only in accordance with the Trust or its Academies' specific directions.

The Trust/Academies are required by law to provide information to the DfE as part of statutory data collections, such as the academy census and the academy workforce return. This data-sharing underpins school funding and educational attainment policy and monitoring.

To find out more about the data collection requirements placed on us by the DfE (for example, via the academy census) please visit the following website:
https://www.gov.uk/education/data-collection-and-censuses-for-schools.

The National Pupil Database (NPD) is owned and managed by the DfE and contains information about pupils in schools in England. The law that allows this is the Education (Information about Individual Pupils) (England) Regulations 2013. 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, please visit the following website:
https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information.

The DfE may share information about our pupils from the NPD with third parties who promote the education or wellbeing of children in England by:

- Conducting research and analysis
- Producing statistics
- Providing information, advice or guidance

The DfE has robust processes in place to ensure that the confidentiality of our data is maintained, and there are stringent controls in place regarding access and use of the data. Decisions on whether the DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- Who is requesting the data
- The purpose for which it is required
- The level and sensitivity of data requested and
- The arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements, retention and use of the data.

For more information about the DfE's data sharing process, please visit the following website:
https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

For information about which organisations the department has provided pupil information to, (and for which project), please visit the following website:
https://www.gov.uk/government/publications/national-pupil-database-requests-received

To contact the DfE go to the following website: https://www.gov.uk/contact-dfe

WHAT ARE YOUR RIGHTS

Under the data protection legislation, Individuals have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to a child's educational record, contact the Chief Privacy Officer in the academy who will work with the Data Protection Officer for the Trust, see details below:-

Individuals also have the right to:

- Be informed about how the Trust or its Academies use their personal data
- Request access to the personal data that the Trust or its Academies hold
- Request that your personal data is amended if it is inaccurate or incomplete
- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Request that personal data is erased where there is no compelling reason for its continued processing
- Request that the processing of your data is restricted

Where the processing of your data is based on your consent, you have the right to withdraw this consent at any time.

If you have a concern about the way Exceed Learning Partnership or its academies and/or DfE is collection or using your personal data, you can raise a concern with us in the first instance or to the Information Commissioner's Office.

An individual wishing to access or amend their personal data should put their request in writing to the Chief Privacy Officer in your academy businessmanager@carrlodgeacademy.org or with Data Protection Officer at DPO@exceedlearningpartnership.com
You should also be aware that certain data is exempt from the right of access. This may include information that identifies other individuals.

CONTACT:

If you would like to discuss anything in this privacy notice, please contact:

- Jane Slee-Karim – businessmanager@carrlodgeacademy.org
  Lorraine Burton - DPO@exceedlearningpartnership.com