

## School Privacy Notice for Pupils

The schools within our Trust need to use information about you to ensure that you are accessing high quality education, learning and support to enable you to do your very best.

The information they hold is kept very safe. Should you want to know what we do with the information, please ask your teacher or speak to your parents/carers and ask them to contact the School Office.

In each School, we have a Data Controller who is your Headteacher, and our main Data Processor is the School Business/Office Manager. The Trust also has a Data Protection Officer. Any of these, can answer any questions you may have about what we do with your information.

If you, or your parents/carers, want to speak to them, then they can do this by contacting the school office or by contacting Jill Wilkinson who is the Trust's Data Protection Officer:

[dataprotection@transformtrust.co.uk](mailto:dataprotection@transformtrust.co.uk)

From the point at which you join our School to when you leave, we will gather, use and process information about you for various purposes. The information we hold is known as 'personal' or 'special' category data. The table below tells you what we hold.

We get this information from your parents/carers, from you directly, from your teachers and other staff, and from other people and organisations like doctors, and we may need to continue to hold some information about you even after you have left the school. Sometimes we need permission to use your information which we get from your parents/carers before we do use it. This includes the use of any images, i.e. photos or videos which we may display in and around school, in newsletters, on our website and sometimes on social media.

Personal Data	Special Data
Name	Racial or Ethnic Origin
Address	Religious Beliefs
Telephone Numbers up to 3 in the event of an emergency	Special Educational Needs and Disability information
Contact Email	Medical and Health information (such as doctors, child health, dental health, allergies and medication)
Date of Birth	Dietary information

Nationality	Safeguarding and child protection information (such as court orders and professional involvement)
Country of Birth	Sexual Orientation
Language(s)	
Unique Pupil Number	
Details of previous/future schools	
Eligibility for free school meals	
Images: Photograph and video for school publications including social media	
Attendance information (such as sessions attended, number of absences, absence reasons and any previous schools attended)	
Behaviour information (such as exclusions and any relevant alternative provision and results)	
Assessment and attainment information (such as EYFS, Phonics, Key Stage 1 and 2 and relevant results)	

We use your information for lots of reasons and some of which are required in order for our schools to fulfil their official functions and meet legal requirement, or because we need to so that we can run the school. We collect and use information for the following:

- a) to support pupil learning
- b) to monitor and report on pupil attainment progress
- c) to provide appropriate pastoral care
- d) to assess the quality of our services
- e) to keep children safe (food allergies, or emergency contact details)
- f) to meet the statutory duties placed upon us.

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing pupil information are:

- for the purposes of (a), (b), (c) & (d) in accordance with the legal basis of Public task: collecting the data is necessary to perform tasks that schools are required to perform as part of their statutory function
- for the purposes of (e) in accordance with the legal basis of Vital interests: to keep children safe (food allergies, or medical conditions)
- for the purposes of (f) in accordance with the legal basis of Legal obligation: data collected for DfE census information

- Section 537A of the Education Act 1996
- the Education Act 1996 s29(3)
- the Education (School Performance Information)(England) Regulations 2007
- regulations 5 and 8 School Information (England) Regulations 2008
- the Education (Pupil Registration) (England) (Amendment) Regulations 2013

In addition, concerning any special category data:

- conditions a, b, c and d of GDPR - Article 9

### **Collecting your information**

Our school will obtain your information via registration forms at the start of each academic year. In addition, when a child joins from another school they are sent a secure file containing relevant information.

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with GDPR we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this.

### **Storing your data**

We hold data securely for the set amount of time shown in our data retention schedule.

### **Who we share your information with**

We routinely share your information with:

- the school that you attend after leaving us
- the local authority
- the Department for Education (DfE)

### **Why we routinely share your information**

We do not share information about you with anyone without consent unless the law and our policies allow us to do so.

### **Department for Education**

We are required to share information about you with the Department for Education (DfE) either directly or via our local authority for the purpose of data collections, under:

- Section 537A of the Education Act 1996
- the Education Act 1996 s29(3)
- the Education (School Performance Information)(England) Regulations 2007
- regulations 5 and 8 School Information (England) Regulations 2008
- the Education (Pupil Registration) (England) (Amendment) Regulations 2013

All data is transferred securely and held by DfE under a combination of software and hardware controls, which meet the current government security policy framework. For more information, please see '**How Government uses your data**' section.

### Requesting access to your personal data

Under GDPR, you and your parents have the right to request access to information we hold about you. To make a request for your personal information, or be given access to your child's educational record, contact the Headteacher at your school or email [dataprotection@transformtrust.co.uk](mailto:dataprotection@transformtrust.co.uk).

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- a right to seek redress, either through the ICO, or through the courts.

We keep your information safe and we make sure that only people who need to have a good reason to see it have access.

Your parents/carers can request to see the information we hold about you, and your parents/carers can also:

- Object to what we are doing with your information
- Have inaccurate or incomplete information about you amended
- Ask us to stop doing certain things with your information in some cases
- Ask that decisions about you are not made using automatic systems
- Complain to the Information Commissioner's Office where you have suffered as a result of the school breaching your data protection rights.

### Concerns

If you are concerned about how we are using your personal data, then you can speak with your teacher or if necessary your parent/carer can contact the Information Commissioner's Office: <https://ico.org.uk/make-a-complaint/>

### **Covid-19**

As a response to the Covid-19 pandemic, some learning has had to become virtually managed. As a result, data may be reviewed and sent electronically via our school's communication platforms such as MS Teams, Zoom, Dojo and Showbie. We will ensure any sharing of data electronically is encrypted and protected. Our Remote Learning and Online/E-Safety Policies outline the procedures and protections that we will take to secure children's personal and special category data.

### **Contact**

If you would like to discuss anything in this privacy notice, please contact: your Headteacher or Jill Wilkinson, Data Protection Officer for Transform Trust on 0115 9825090 or email: [dataprotection@transformtrust.co.uk](mailto:dataprotection@transformtrust.co.uk)

#### **Local Authority Derby**

Information Governance  
Derby City Council  
Council House  
Corporation St  
Derby  
DE1 2FS

Email: [Information.Governance@derby.gov.uk](mailto:Information.Governance@derby.gov.uk)

Tel: 01332 640763

#### **Local Authority Nottingham**

Data Protection Team  
Legal Services  
Nottingham City Council  
Loxley House  
Station Street  
Nottingham  
NG2 3NG

Email: [data.protection@nottinghamcity.gov.uk](mailto:data.protection@nottinghamcity.gov.uk)

Tel: 0115 876 3855

#### **Local Authority - Nottinghamshire**

Information and Systems Team,  
Quality and Improvement Group Children,  
Families and Cultural Services,  
Nottinghamshire County Council  
County Hall,  
West Bridgford  
Nottingham,  
NG2 7QP

Email: [data.management@nottscc.gov.uk](mailto:data.management@nottscc.gov.uk)

## 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 (for example, school 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

The law allows the Department to share pupils' personal data with certain third parties, including:

- schools
- 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. Whilst numbers fluctuate slightly over time, DfE typically supplies data on around 600 pupils per year to the Home Office and roughly 1 per year to the Police.

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/dfe-external-data-shares>

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