

## PRIVACY NOTICE FOR PUPILS

### How we use pupil information – Saracens Multi-Academy Trust

#### The categories of pupil information that we collect, hold and share include:

- Personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- Characteristics (such as ethnicity, language, nationality, country of birth, free school meal eligibility, and special educational needs)
- Medical and administration (such as doctors' information, child health, dental health, allergies, medication and dietary requirements)
- Special Education Needs information (including the needs and ranking)
- Attendance (such as sessions attended, number of absences, reasons for absence and any previous schools attended)
- Assessment and attainment (such as Key Stage 1 and Phonics results, Post-16 courses enrolled for and any relevant results)
- Behavioural information (such as exclusions and any relevant alternative provision put in place)
- Personal information about a pupil's parents/carers and/or other relatives (such as name, contact details, relationship to child)
- Safeguarding referrals and paperwork (such as court orders and professional involvement)
- Catering and free school meal management
- Management of school trips
- Pupil and curricular records
- Details of any support received, including care packages, plans and support providers
- Data about pupils that we have received from other organisations, including other schools, local authorities and the Department for Education (DfE)
- CCTV, access control video/systems and still photography, for safeguarding, if installed on site.

#### Why we collect and use this information:

- to support pupil learning
- to monitor and report on pupil progress and attainment
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing
- to promote the school - use of images and film on school websites, publication display boards and social media
- to share data for statutory inspections and audit purposes
- to keep children safe (food allergies, photos of susceptible children, and emergency contact details)
- to monitor pupil behaviour
- for monitoring school IT and communication systems for data security purposes
- for safeguarding purposes
- for the analysis of statistics for diversity
- for legal compliance - Health and Safety, Equality Act etc.
- for monitoring the performance of the school
- to meet the statutory duties placed upon us for the DfE data collections
- for alumni contacts.

### The lawful basis on which we process this information:

We only collect and use pupils' personal data when the law allows us to. 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 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 allow and justify our use of this data.

We collect and use pupil information under:

- The Education Act (various years)
- The Education (Pupil Registration) (England) Regulations
- The School Standards and Framework Act 1998
- The School Admissions Regulations 2012
- Children and Families Act 2014
- Safeguarding Vulnerable Groups Act 2006
- The Childcare (Disqualification) Regulations 2009
- The Special Educational Needs and Disability Regulations 2014
- Census Workforce Education Act 1996
- Article 6, and Article 9 (UK GDPR)
- Article 23 UK GDPR (Restrictions prevention, investigation and detection of crime)
- Data Protection Act 2018 Schedule 1 paragraph 18 (Individuals at risk)
- Data Protection Act 2018 Schedule 1 paragraph 8 (Equality of opportunity).

The DfE process census data under the various Education Acts - further information can be found on their website: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

### Collecting pupil information:

We collect pupil information via registration forms and Common Transfer File (CTF) at the start of the school year.

Whilst the majority of pupil information you provide to us is mandatory, some is provided to us on a voluntary basis. In order to comply with the UK General Data Protection Regulation (GDPR), we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

### Storing pupil data:

We keep personal information about pupils while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. We keep information about pupils in accordance with the Trust's Data Retention Policy.

For further information please contact [gdpr@saracensmat.org](mailto:gdpr@saracensmat.org)

### Who we share pupil information with:

- Department for Education (DfE)
- The Local Authority (Barnet Council) and where appropriate, other councils
- Central and local government
- Barnet Education & Learning Service (BELS)
- Ofsted
- School pupil tracker
- MIS Arbor
- Insurance providers
- NHS (including CAMHS, social care, therapy providers and organisations)
- Health and social welfare organisations
- Police, courts and tribunals
- Online learning resources (Google classroom etc)
- Pupil assessment companies
- Evolve
- IT Provider - ICT Team
- Dojo
- Slack
- Catering company/Catering Team
- Schools that the pupils attend after leaving us
- WONDE (populated from Arbor)
- Safeguarding system (CPOMS)
- Photography companies
- The pupil's family and representatives
- Educators
- Examining bodies
- Suppliers and service providers - to enable them to provide the service we have contracted them for
- Financial organisations
- InVentry
- Auditors
- Medical Tracker
- PiXL Edge
- The public (on the SMAT and school websites)
- Satchel One
- School Booking
- Tes Parents' Meetings (SchoolCloud)
- Insurance providers
- Pupil assessment companies
- Online file and organisational management (GovernorHub, shared website area, Google drive and or Office 365)
- Sophos
- Zoom and MS Teams, etc
- Survey and research organisations
- Security organisations
- Professional advisers, consultants and bodies
- Filtering and Monitoring - SmoothWall
- Charities and voluntary organisations
- Other companies/people/organisations in reasonable circumstances.

### Why we share pupil information:

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

We share pupils' data with the DfE on a statutory basis. This data sharing underpins school funding, educational attainment and monitoring.

We are required to share information about our pupils with our local authority and the DfE under Section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

### **Police National Security, Defence, Public Security**

We share information on request with the Police and Security Services for the prevention investigation and detection of crime (Article 23 UK GDPR).

### **Youth support services - Pupils aged 13+**

Once our pupils reach the age of 13, we also pass pupil information to our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19-year-olds under Section 507B of the Education Act 1996.

This enables them to provide services as follows:

- youth support services
- careers advisers.

The information shared is limited to the child's name, address and date of birth. However, where a parent or carer provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the child / pupil once they reach the age 16.

### **Pupils aged 16+**

We will also share certain information about pupils aged 16+ with our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19-year olds under Section 507B of the Education Act 1996.

This enables them to provide services as follows:

- post-16 education and training providers
- youth support services
- careers advisers.

For more information about services for young people, please visit our local authority website.

### **Department for Education (DfE)**

The DfE collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our pupils with the DfE either directly or via our local authority for the purpose of those data collections, under: Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013. This data is used for many purposes, including to inform funding, monitor education policy and school accountability and to support research.

All data is transferred securely and held by the DfE under a combination of software and hardware controls, which meet the current [government security policy framework](#).

### **Data collection requirements**

To find out more about the data collection requirements placed on us by the DfE (for example, via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

### **The National Pupil Database (NPD)**

The NPD is owned and managed by the DfE 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 DfE. 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.

We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013.

To find out more about the NPD, go to <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 well-being of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance.

The DfE has robust processes in place to ensure 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 the data, security arrangements and retention and use of the data.

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

For information about which organisations the DfE's has provided pupil information, and for which project, please visit the following website: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

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

### **Transferring data internationally:**

If we transfer personal data to a country outside the UK, we will do so in accordance with data protection law.

### **Requesting access to your personal data:**

Under data protection legislation, parents and pupils 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 your child's educational record, please contact [gdpr@saracensmat.org](mailto:gdpr@saracensmat.org)

You also have the right:

- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.

If you have a concern or a complaint about the way we are collecting or using your personal data, we request that you raise your concern or complaint with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

**Contact:**

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

David Powell

[dpo@sapphireskies.co.uk](mailto:dpo@sapphireskies.co.uk)