

Privacy Notice for Parents and Pupils – How we use your information

2022/23

Who are we?

Inspiring Primaries Academy Trust is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Inspiring Primaries Academy Trust is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: ZA291758.

You can contact the Academy Trust as the Data Controller in writing at:
Inspiring Primaries Academy Trust, Church Lane, Gilmorton, Lutterworth, Leicestershire, LE17 5LU or enquiries@ipat.uk.

What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our pupils and parents.

What is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information relates to personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

What personal information do we process about pupils and parents?

The pupil and parent information that we collect, hold and share (when appropriate)

- Personal information including a pupil's name, date of birth, unique pupil number, home address.
- Attendance information such as sessions attended, number of absences and absence reasons.
- Educational information including records of work, assessment results, relevant medical information, details of pupils' special educational needs, exclusions/behavioural information.
- Contact information for parents, carers and other relatives, including telephone numbers, home addresses and e-mail addresses.
- Information about a child's home life, where required as part of necessary safeguarding and welfare processes.
- Details of any support received, including care packages, plans, and support providers.

We may also collect, use, store and share (when appropriate) information about your child that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- Any medical conditions we need to be aware of, including physical and mental health
- Photographs and CCTV images captured in school
- Characteristics, such as ethnic background or special educational needs.

Why do we use personal information?

We use pupil data to:

- support pupil learning
- monitor and report on pupil progress
- provide appropriate pastoral care
- protect pupil welfare
- assess the quality of our services
- comply with the law regarding data sharing
- safeguard pupils
- share medical information with health professionals
- administer admissions waiting lists
- carry out research

Use of yours or your child's personal data for marketing purposes

Where you have given us consent to do so, we may send you or your child marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to them.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by contacting us (see 'Contact us' below).

Collecting pupil information

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 the UK General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

Most of the data we collect in relation to parents and pupils will come direct from the parent or pupil. However, we may also hold data relating to you and/or your child that has come from:

- Local authorities
- Government departments or agencies
- Police force, courts, tribunals
- External support services.

What are the legal reasons for us to process your personal information?

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. The lawful reasons we have for processing personal information are as follows:

1) To comply with the law

We collect and use general purpose pupil information in order to meet certain legal requirements and legal obligations placed upon the Academy Trust by law. We therefore are required to process personal information for such purposes even if you have not consented to us doing so.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

If you would like a copy of or further information regarding the statutory authorities that

2) To protect someone's vital interests

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

3) With the consent of the individual to whom that information 'belongs'

Whilst much of the personal information processed is in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

4) To perform a public task

It is a day-to-day function of the Academy Trust to ensure that children receive the education and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that pupils are properly educated and supported.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

5) We have a legitimate interest

Occasionally we have reasons to process information which fall outside of our usual day-to-day school functions. Details of the type of processing that we may undertake on this basis are set out in Table 5.

Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

- 1) Explicit consent of the data subject
- 2) Processing relates to personal data which is manifestly made public by the data subject
- 3) Necessary for establishing, exercising or defending legal claims
- 4) Necessary for reasons of substantial public interest
- 5) Necessary for preventive or occupational medicine, or for reasons of public interest in

the area of public health

- 6) Necessary for archiving, historical research or statistical purposes in the public interest.

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation.

Who might we share your information with?

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- central and local governments
- the pupil's family and representatives
- our regulator Ofsted
- our auditors
- School nurse
- Police forces, courts, tribunals
- Professional advisers and consultants
- Safety and research organisations
- NHS
- Public Health and other public health agencies
- Information Management software: Arbor, Wonde
- Education/classroom apps: Times Tables Rockstars, Studybugs, Mathletics
- Education platforms for homework and home learning: Google Classroom
- HR and Payroll

allow us to do so.

Please refer to the tables for information about what personal information is shared with which specific third parties.

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>.

What do we do with your information?

All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected. The Academy Trust monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

We have security measures in place to prevent yours and your child's information from being accidentally lost, used, or accessed in an authorised way, altered, or disclosed.

How long do we keep your information for?

In retaining personal information, the Academy Trust complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the Academy Trust are required to retain the information.

A copy of those schedules can be located using the following link:
<http://irms.org.uk/page/SchoolsToolkit>

Transferring data internationally

Where we transfer personal data to a country outside of the UK, we will do so with the appropriate safeguards in place in accordance with data protection law.

What are your rights with respect of your personal information?

Under data protection law, 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 to have access to your child's educational record, contact the school data protection contact or the School

schooldpo@warwickshire.gov.uk or alternatively:

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL

****Please ensure you specify which school your request relates to.**

In certain circumstances where the Academy Trust processes data for the purposes of legitimate interests or to fulfil their public task, individuals have a right to object to the processing where it is likely to cause, or is causing, harm or distress. When exercising this right, individuals should contact the school/academy trust to inform them of their reasons for their objection. The school/academy trust will consider the reasons for any objection and assess the risk to the individual against the purposes for the processing. In the event the school/academy trust is unable to comply with an objection, we will ensure we can demonstrate compelling legitimate grounds to continue with the processing.

Where the Academy Trust processes your information with your consent, you have the right to withdraw your consent at any time. To exercise this right, please contact the Academy Trust at enquiries@ipat.uk.

You also have the right to:

- 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
- claim compensation for damages caused by a breach of the Data Protection regulations

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

Review

The content of this Privacy Notice will be reviewed annually.

Date reviewed: 18 July 2023

Date of next review: 17 July 2024

Table 1 – Personal information we are required to process to comply with the law:

Information type	Relevant legislation	Special category – additional lawful reason	Third parties with whom we share the information	Lawful reason for sharing
Pupil full name	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform ParentPay - online payment system Cool Milk Tapestry - Assessment and tracking tool for Reception class Google Workplace for Education – Online learning platform TTRockstars - Online Times tables App (https://trockstars.com/) EdShed - Online Maths and English Platform (https://www.edshed.com/en-gb/) 	To perform a public task
Gender	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform Tapestry - Assessment and tracking tool for Reception class 	To perform a public task



	Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)		<ul style="list-style-type: none"> • Department of Education • School to which pupil has transferred. 	obligation
			<ul style="list-style-type: none"> • Arbor - Management Information System • Safeguard - online safeguarding platform • Tapestry - Assessment and tracking tool for Reception class 	To perform a public task
Home Address	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3 (2)	n/a	<ul style="list-style-type: none"> • Local Authority • Department of Education • School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> • Arbor - Management Information System • Safeguard - online safeguarding platform 	To perform a public task
First Language	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> • Local Authority • Department of Education • School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> • Arbor - Management Information System 	To perform a public task
Ethnicity	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation	n/a	<ul style="list-style-type: none"> • Local Authority • Department for Education • School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> • Arbor - Management Information System 	To perform a public task



National Identity, Country of Birth, Nationality	Education Act 1996 Section 537A	n/a	<ul style="list-style-type: none"> Local Authority Department for Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System 	To perform a public task
Date of Admission to school	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department for Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System 	To perform a public task
Last school attended - name and address	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department for Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System 	To perform a public task
National Curriculum Year Group	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department for Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform ParentPay - online payment system Cool Milk Tapestry - Assessment and tracking tool for Reception class Google Workplace for Education – Online learning platform TTRockstars - Online Times tables App (https://ttrackstars). 	To perform a public task



			<ul style="list-style-type: none"> com/ EdShed - Online Maths and English Platform (https://www.edshed.com/en-gb/) 	
Unique Pupil Number (UPN)	Education Act 1996 Section 537A	n/a	<ul style="list-style-type: none"> Local Authority Department for Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform 	To perform a public task
Eligibility for Free School Meals	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department for Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform Tapestry - Assessment and tracking tool for Reception class 	To perform a public task
Mode of Travel to School	Education Act 1996 Section 508A	n/a	<ul style="list-style-type: none"> Local Authority Department for Education School to which pupil has transferred. 	Legal obligation
Proficiency in English	Education Act 1996 Section 537A	n/a	<ul style="list-style-type: none"> Local Authority Department for Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor – Management Information System 	To perform a public task
Whether a pupil is Looked After and the name of relevant Local Authority	The Education (Information about Individual Pupils) (England) Regulations	n/a	<ul style="list-style-type: none"> Local Authority Department for Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System 	To perform a public task



	2013 Regulation 3(2)		<ul style="list-style-type: none"> Safeguard - online safeguarding platform 	
Where a pupil is no longer Looked After, the type of order that brought this about.	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department for Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform 	To perform a public task
Special Educational Needs status, start date, details of needs and provision	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department for Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform 	To perform a public task
Details of Exclusions: start and end dates, number of sessions, fixed length/ permanent, reason for exclusion	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department for Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform 	To perform a public task
Assessment Data - End of Key Stage, Year 1 Phonics Check and Year	The Education (Pupil Information)	n/a	<ul style="list-style-type: none"> Local Authority Department for Education 	Legal obligation



Check	Regulations 2005		<ul style="list-style-type: none"> School to which pupil has transferred. 	
			<ul style="list-style-type: none"> Arbor - Management Information System 	To perform a public task
Pupil Annual Reports	The Education (Pupil Information) (England) Regulations 2005	n/a	<ul style="list-style-type: none"> School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Google Workplace for Education 	To perform a public task
Attendance records including whether absence was authorised/ unauthorised and reason for absence	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department for Education School to which pupil has transferred. Educational Welfare Officer 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform 	To perform a public task
Parent's / Carer's names	The Education (Pupil Information) (England) Regulations 2006 Regulation 5 (1)(c)	n/a	<ul style="list-style-type: none"> Local Authority Department for Education School to which pupil has transferred. Educational Welfare Officer 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System 	To perform a public task
Parent's / Carer's contact details	The Education (Pupil Information) (England) Regulations 2006	n/a	<ul style="list-style-type: none"> Local Authority Department for Education School to which pupil has transferred. 	Legal obligation

	Regulation 5 (1)(c)		<ul style="list-style-type: none"> Educational Welfare Officer 	
			<ul style="list-style-type: none"> Arbor - Management Information System 	To perform a public task
Pupil Assessment Data (Curricular Record)	The Education (Pupil Information) (England) Regulations 2005, Regulation 4		<ul style="list-style-type: none"> Arbor - Management Information System 	To perform a public task

Table 2 – Personal information we are required to process as it is necessary to protect someone’s vital interests

Information type	Special category – additional lawful reason	Third parties with whom we share the information	Lawful reason for sharing
Medical Information	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent.	Medical staff i.e. paramedics/ambulance	Vital Interest
Medical Information and conditions	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent.	External third parties such as coaches and volunteers supporting curricular or extracurricular activities	Vital Interest
Dietary / allergies	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent.	<ul style="list-style-type: none"> Medical staff i.e. paramedics/ambulance Catering Staff – Educaterers Residential Accommodation providers – e.g. PGL 	Vital Interest

		<p>will be provided by third parties</p> <ul style="list-style-type: none"> other schools and locations visited on school trips 	
Religious belief	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent.	<ul style="list-style-type: none"> Medical staff i.e. paramedics/ambulance 	Vital Interest

Table 3 - Personal information we are required to process with the consent of the individual to whom that information ‘belongs’ - *please note that you have the right to withdraw your consent for us to process this information at any time.*

Information type	Special category – additional lawful reason	Third parties with whom we share the information	Lawful reason for sharing
Digital Photographs / videos		<ul style="list-style-type: none"> Media organisations to take photographs of pupils (including your child) engaged in school activities or events for publication School Newsletter School Prospectus School Website Facebook and Twitter Official school photographs, with images taken by an external Photographic company and available for purchase by parents 	Consent

Table 4 - Personal information we are required to process because it is necessary to do so in order to perform a public task – please note that the right to object will apply to **some** of this processing, please see the section above that refers to ‘*What are your rights with respect of your personal information?*’



	additional lawful reason	whom we share the information	sharing
Year Group		Public Health and other public health agencies	Public task
Pupil Information i.e. name, age, address, parent / carer details, emergency contact details		<ul style="list-style-type: none"> • Department for Education – school census. • Other schools – when pupils transfers • Public Health and other public health agencies 	Public Task & Legal Obligation
Academic Progress data including Pupil Reports, Assessment records, learning journals, staff observations		<ul style="list-style-type: none"> • OFSTED • Parents • Health Services such as Speech and Language 	Public Task & Legal Obligation
Safeguarding information, Medical, Special Education Needs		<ul style="list-style-type: none"> • Local Authority • Health • Parents • Other schools on pupil transfer 	Legal Obligation
Pupil Premium / FSM		<ul style="list-style-type: none"> • Department for Education – school census. • Other schools – when pupils transfers 	Public Task
Adopted children / LAC status		<ul style="list-style-type: none"> • Department for Education – school census. • Other schools – when pupils transfers 	Public Task
Service Children		<ul style="list-style-type: none"> • Department for Education – school census. • Other schools – when pupils transfers 	Public Task

Court Orders		<ul style="list-style-type: none"> Other schools – when pupils transfers 	Public Task
The pupil is considered a young carer		<ul style="list-style-type: none"> Other schools – when pupils transfers 	Public Task
Attendance records		<ul style="list-style-type: none"> Local Authority Other schools – when pupils transfers 	Public Task

Table 5 - Personal information we process because we have a legitimate interest. please note that the right to object will apply to **some** of this processing, please see the section above that refers to 'What are your rights with respect of your personal information?'

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Images captured on a schools' CCTV system	n/a	<ul style="list-style-type: none"> Police and legal system where a suspected crime has been committed 	Legal obligation