



Privacy Notice for Pupils

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was updated on **26th January 2023**.

You will find the latest version of the Privacy Notice for Pupils at www.pdet.org.uk or your child's school's website.

Privacy Notice for Pupils (*issued to parents and carers due to the pupils age*)

We understand that you care about the privacy and security of your child's personal data and the Trust takes its data protection obligations very seriously.

When your child attends a school within our Trust, we need to collect, use and share personal information about them. Our aim is to handle our pupil's personal information openly and transparently. The purpose of this Privacy Notice is to explain who we are and how we use and protect pupil personal information before, during and after their time at a school within the Trust. It also explains their legal rights, and how you as parents/carers may sometimes exercise these rights on their behalf.

Who is this information for?

This privacy notice relates to the way in which we handle personal information about our pupils. This information mostly relates to current pupils but also applies to pupils that used to attend one of our schools and pupils that have applied to join us.

Who we are

Your child's school is part of the Trust called Peterborough Diocese Education Trust (PDET). The Trust is the organisation which is in charge of your child's personal information. This means the Trust is called the Data Controller.

The postal address of the Trust is Unit 2 Bouverie Court, 6 The Lakes, Bedford Road, Northampton, NN4 7YD.

If you want to contact us about your child's personal information, you can contact our Data Protection Officer who is Angela Corbyn in the following ways:

- By telephone on 07775 436141
- Leave a letter at our offices at the address above or send one by post
- By email: dpo@pdet.org.uk

In this policy 'we' and 'us' means the Trust.

The categories of pupil information that we process

Personal data that we may collect, use, store and share (where appropriate) about pupils includes, but is not restricted to:

- identification information (such as name, date of birth, address and unique pupil number);
- contact details (such as email address and telephone numbers);
- characteristics (such as ethnicity, gender and language);
- safeguarding information (such as court orders and professional involvement);
- special educational needs (including the support, needs and ranking);
- medical and administrative information (such as doctors information, child health, dental health, allergies, medication and dietary requirements);
- attendance information (such as sessions attended, number of absences, absence reasons and any previous schools or early years settings attended);
- results of internal and external assessments and tests (such as key stage 1, 2 and phonics screening results);
- behavioural information (such as exclusions and any relevant alternative provision put in place);
- information about free school meal and pupil premium eligibility;
- information for catering management purposes (e.g. whether your child has school dinners and how often);
- photographs and / or videos of your child for education purposes (such as to document learning and achievements within workbooks and on home learning platforms; for remote education and as part of live teaching online; classroom displays and reward systems; for pupil profiles and for medical needs identification);
- CCTV footage and images;
- any additional support provided to your child.

Sometimes the information we collect is more sensitive such as information about health and medical needs, for example, allergy or safeguarding information. We call this “special category personal data”. Special category personal data relates to information concerning health, genetics, biometrics (where used for identification purposes) racial or ethnic origin, political opinions, sexual orientation, sexual life and religious beliefs.

Some examples of special category personal data the Trust collects about its pupils are as follows:

- Information about your child’s race or ethnic background;
- Medical and health information (such as information about any allergies your child has, food that they shouldn’t eat for any reason, a record of vaccinations that they have had, information about their health and any medication they need and information from their doctor.)

Very occasionally we collect and use information about criminal records and offences but only where the law allows us to do this.

Why we collect and use pupil information

The Trust will only use pupil personal data when the law allows us to. In most cases, pupil information is needed to run the schools within the Trust, to teach and support pupils, for safeguarding purposes, and to comply with our legal obligations.

In most cases, we anticipate that we will use pupil personal data for the following legal reasons:

Legal Reason: To comply with our legal obligations, for example:

- To comply with legal rules set by the Department for Education that require us to collect personal information about our pupils;
- To comply with laws relating to pupil attendance;
- To monitor and report on pupil progress;
- To provide pastoral care to pupils;
- To monitor the performance of the Trust;
- Safeguarding of pupils.

Legal Reason: As a public authority, the Trust needs to process pupil personal data in order to comply with its statutory functions of operating and managing the schools within the Trust and to provide education (public task):

- To deliver education and support pupil learning;
- To monitor the use of the Trust's IT systems to make sure they are being used appropriately and in accordance with the Trust's rules.
- Processing complaints or carrying out an investigation.
- Use of pupil images, video recordings and audio recordings as part of the curriculum.
- To keep pupils safe and secure including through the use of our CCTV systems.
- Where we need to use pupil information for reasonable Trust purposes such as obtaining insurance or asking for advice from someone outside the Trust.

Legal reason: Where we need to protect someone's vital interests:

There may be very rare occasions when we need to use pupil personal data to protect your child's, or another person's, vital interests. For example, where someone is seriously injured and we need to share personal information with a medical professional in an emergency.

Legal Reason: Where we need consent:

In most cases, we will not need to rely on consent to use pupil personal data. However, there are

a few occasions where we either need it or choose to ask for it. Where we are relying on the legal basis of consent, you are under no obligation to provide it and if you do consent on your child's behalf, you may withdraw your consent at any time.

We ensure to keep consent up to date and so may ask for your consent more than once.

Examples of where we may rely on consent include:

- To publish images or video of pupils on our schools' or Trust website, our social media channels or in our printed literature such as a prospectus.
- To share photographs (or video) of pupils with others outside the Trust such as a journalist.

Using special category personal data

Occasionally, the Trust may need to collect and use special category personal data such as information about health. The legal reasons for doing this include:

Vital interests: For example, to share information about medical conditions that your child may have with a doctor or hospital in the event of an incident or accident;

Legal Claims or Judicial Acts: For example, where information is needed in a legal process;

Reasons of Substantial Public Interest: For example, to share information with the police or social services where this is necessary for safeguarding a pupil's welfare; or for legal and regulatory purposes such as child protection, diversity monitoring, health and safety and information about special educational needs and disability (SEND for short);

Health or Social Care: For example, where it is necessary to share pupil information with a speech and language health professional;

Public Health: For example, where pupil information needs to be collected and used in connection with a public vaccination programme or in response to a pandemic such as the COVID-19 pandemic. Where this happens, the data is handled by a health professional such as a nurse or someone who the law says must keep your information confidential.

How we collect pupil information

Most pupil information held by the Trust comes from pupils themselves, parents/carers and teaching staff. In some cases, we may receive information from the local authority or the Department for Education, professionals such as a social worker, your child's previous school, or

from a concerned party (such as a friend, relative, neighbour, doctor or the police).

How long we keep pupil information

We delete or destroy personal data securely when the purpose for collecting it has been met and there are no other legal reasons for keeping it. In most cases we will keep most pupil personal data until they leave the school, in which case we send their records to their new school. For further information about our record retention practices and how long we keep pupil personal data, please see our Records Retention and Deletion Policy available via our website:

www.pdet.org.uk

When we may share pupil information with others

We will not give information about pupils to anyone without their parent's/carer's consent unless the law and our policies allow us to do so.

We will take family circumstances into account, in particular where a Court has decided what information a parent/carer is allowed to have.

Where it is legally required, or necessary (and it complies with data protection law) we may share pupil information with:

- A pupil's new school if / when they move schools;
- The local authority;
- The Department for Education (DfE);
- Ofsted;
- Examining bodies;
- Organisations that help run the school (such as school caterers, sports coaches, parent communication and payment facilities, online learning platforms, IT services and software providers, cloud storage providers);
- Support services (such as school nurse, NHS, school counsellors, CAMHS - Child and Adolescent Mental Health Service, professionals connected with SEND support);
- Organisations and people outside the school that need to use pupil information for their own reasons. For example, the PTA (or equivalent), visiting music teachers, complaints panels and / or independent reviewer where a complaint has been made by a parent/carer, the police, the Teaching and Regulation Authority, CAF/CASS (this stands for The Children and Family Court Advisory and Support Service).

Sometimes, the information we share will include sensitive personal information about pupils. Usually this means information about a pupil's health and any special educational needs or

disabilities which they have. We only share this information where it is necessary for us to do so and so that pupils can receive the necessary support.

Sharing information with the Department for Education

We are required by law to share some information about our pupils with the DfE as part of legal data collections such as the school census and early years' census. Some of this information is then stored in The National Pupil Database (NPD). The NPD is owned and managed by the DfE and contains evidence on educational performance which can be used to help independent research and study.

You can find out more about the pupil information we share with the DfE, for the purpose of data collections, here <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

To find out more about the NPD, visit [National pupil database: user guide and supporting information - GOV.UK](#).

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.

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 has provided pupil information please visit <https://www.gov.uk/government/publications/national-pupil-database-requests-received>.

Transferring personal data to other Countries

In most cases pupil personal data remains in the UK. However, occasionally we may need to transfer it outside the UK, for example, to relatives living abroad or where pupils transfer to a school outside the UK.

Some of our suppliers and service providers are located outside the UK and may need to process your child's personal data when providing us with services, for example, software support, education learning technologies or a company which we use for carrying out surveys may handle information on our behalf.

On the few occasions where we do transfer your information outside the UK, we will ensure it is protected and handled in line with data protection law. For example, we will only transfer it to a country that is officially considered to provide adequate protection for personal data or protect it

by using one of the safeguarding measures available under data protection law.

If you would like more information about how we protect personal data if it is transferred outside the UK please contact our Data Protection Officer.

Your data protection legal rights

Data protection law provides individuals with various legal rights, which may be exercised in certain circumstances. Where a pupil is not deemed mature enough to exercise these legal rights on their own, in certain circumstances, you (or someone else who your child authorises) may be able to exercise these rights on behalf of your child.

Unless there is another reason why a child might not be considered capable of understanding their rights, a child is generally considered to be mature enough to exercise these legal rights on their own when they reach the age of 12.

Please note, these rights still belong to your child, even where you are exercising them on their behalf. Where someone is exercising a child's legal rights on their behalf, when deciding how to process that legal right, we must consider what is in the best interests of the child. This means that we need to consider relevant factors, including:

- any court orders relating to parental access or responsibility that may apply;
- any duty of confidentiality owed to the child;
- any consequences of allowing access to the child's information (this is particularly important if there have been allegations of abuse);
- any potential detriment to the child if individuals with parental responsibility, or their authorised representatives, cannot access this information; and
- any views the child has on whether their parents, guardians or authorised representatives should have access to their personal data.

Your child has the following legal rights:

- *The right of access*
 - This right provides individuals with a right to have confirmation that their personal data is being processed, request a copy of their personal data, and receive other supplementary information (e.g. about the way in which the Trust is processing their personal data). When this legal right is exercised it is usually called a subject access request or "SAR".
 - This legal right is subject to legal exemptions. That means that we can withhold personal data in certain circumstances. For example, we are permitted to withhold

personal information that is contained within confidential legal advice. We may also withhold personal information where giving it would also result in sharing personal information about other people.

- *The right to rectification*
 - Individuals may request that we correct any information we hold if it is inaccurate or incomplete.
- *The right of erasure (also known as the right to be forgotten)*
 - Individuals may request personal data held is deleted in some circumstances, for example, where you believe we have no good reason to continue processing. However, we are not under an obligation to comply with such requests if there are good reasons not to.
- *The right to restrict our use of your information*
 - Individuals may ask us to limit what we are doing with their personal data. This right only applies in certain circumstances.
- *The right to object*
 - Individuals can object to what we are doing with their personal data. This right only applies in certain circumstances.
- *The right to withdraw consent*
 - Individuals can withdraw consent provided to the processing of their personal data, if we are processing it on the basis of consent.
- *The right to data portability*
 - Individuals may ask us to transfer personal data to another organisation in a format that makes it easy for them to use. This right only applies in certain circumstances.

If you wish to exercise any of these rights on your child's behalf (or if your child wishes to exercise these rights themselves), please contact our Data Protection Officer.

In most cases we have one month to respond to a request.

You can find out more information about your legal rights in our Data Protection and Individual Rights Policy which can be found here www.pdet.org.uk.

The right to complain

You can complain to our DPO (contact details on page 2) about what we do in relation to your child's personal information. If you are not happy with our answer to your complaint, then you can complain to the Information Commissioner's Office:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.