Privacy Notice for Pupils and Parents

This Notice applies to all schools within The Partnership Trust

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About this Privacy Notice

This privacy notice applies to all schools within The Partnership Trust and is covered by the Trust's Data Protection Policy.

Individuals have a legal right to be informed about how we use their personal information. This Privacy Notice explains how we collect, store and use personal information. It is intended for pupils and parents (including carers or guardians who we refer to in this privacy notice as 'parents') and we encourage all to read it. We have produced a separate privacy notice for the school's workforce **and a shorter, simpler notice for pupils themselves.**

Our aim is to always provide clear information about the personal information we are using and why we are using it. We have tried to keep the language in this privacy notice as simple as possible, however if anything is unclear or if you have any concerns then please contact your school office (contact details for all schools within The Partnership Trust can be found at Appendix 8) or

The Partnership Trust
Longfellow Road
Radstock
BA3 3AL
office@thepartnershiptrust.com

This is the Trust and its school's main 'overarching' privacy notice and it applies generally to the personal information that we collect and use. It is based on the model privacy notice produced for schools by the Department for Education (DfE). Unless there is a lawful reason not to do so, we will also provide more specific privacy information at the point at which we collect or use personal information, for example if we collect personal data via an online or paper form.

Whilst much of the personal information that we collect is mandatory (i.e. it must be provided so that we can manage the school, fulfil our legal obligations and provide an education), some of it is requested on a voluntary basis. Where this is the case, we will request consent at the point we collect the information. We will explain to you whether there

is a requirement to provide certain information to us, or whether you have a choice in doing so.

For the purposes of data protection law, the Partnership Trust is the 'data controller'. Our Data Protection Officer is One West**,** contact details are provided at the end of this privacy notice.

The personal data we hold (categories of personal data)

We process personal information to be able to run the Trust and its schools, to provide pupils with an education and to make sure that we can look after our pupils appropriately. We may collect information directly from pupils or parents or from other places including other schools, the local council and the Department for Education (DfE). Examples of the types of personal data that we may collect, use, store and share (when appropriate) are listed at **Appendix 1.**

Our lawful reasons for processing pupil/parent information (lawful bases)

Data Protection law requires us to have a lawful reason ('lawful basis') for processing the personal data we use. These reasons are listed under Article 6 of the 'General Data Protection Regulation' (GDPR). Our lawful basis for processing will be explained at the point at which we collect personal information unless there is a lawful reason not to do so (for example where it is for the prevention or detection of crime).

The Partnership Trust and schools within it process a wide range of personal data for a variety of purposes, as described above. The lawful bases we rely on will therefore vary. However, generally, the lawful bases we mainly use in relation to pupils and parents are:

- **We need to comply with the law (we have a legal obligation):** For example, we collect and use pupil information under legal and statutory obligations within the Education Act 1996, The Children Act 2004; Education and Inspections Act 2006; Education Act 2011; the Family and Children Act 2014 and Keeping Children Safe in Education (KCSIE).

- **We need to carry out a task in the public interest:** For example, the collection and use of pupil information is necessary for us to perform our role as a Trust and school and to deliver our public task of providing education to our pupils.

- **You have given us your consent** for example a photo of you for promotional purposes or our website.

- **We need to protect your vital interests (or someone else's interests).** This relates to life and death situations**.**

- **It is in ours, or a third party's, legitimate business interests to process the data**. Where this is the case, we will ensure that we have considered whether our legitimate interests are overridden by your rights and freedoms as the pupil or parent.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so. We will then cease this aspect of processing.

When a pupil is considered mentality capable of making their own decisions with regards consent (while there is no defined age, this is normally considered once a child attends Secondary school), their consent choices over-ride those made by the parent or guardian.

Some of the reasons that we use for collecting and using information may overlap and there may be several grounds allowing us to use personal data. There are also other lawful bases that may apply, and this will be made clear wherever possible.

Our lawful basis for processing will be explained at the point at which we collect personal information unless there is a lawful reason not to do so (for example where it is for the prevention or detection of crime).

Special category (sensitive) personal information

We may also collect, store, and use information about you that falls into "special categories" of more sensitive personal data which has extra protection in law and requires us to identify a condition for processing under Article 9 of the GDPR.

Special category data is personal data revealing:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric data for the purpose of uniquely identifying a natural person (for example fingerprints)
- data concerning health; or
- data concerning a natural person's sex life or sexual orientation

The Article 9 grounds which we may rely on to process special category data include:

- Legal obligation
- Substantial public interest including:
    - Statutory and government purposes
    - Equality of opportunity or treatment
    - Preventing and detecting unlawful acts
    - Preventing fraud
    - Public Health
    - Safeguarding
- Support for individuals with a particular disability or medical condition
- Explicit consent, for example to the use of biometric data, eg fingerprints.

- To maintain your vital interests

Please refer to our Data Protection Policy (which is on the trust website) for further information.

Criminal convictions

We may process data about criminal convictions or offences. This will usually be where such processing is necessary to carry out our obligations, to exercise our rights, to look after our students and staff or to support the police and other relevant agencies.

We will only use information about criminal convictions or offences where the law allows us to. Usually this will either be either on the basis of our legal obligations in relation to safeguarding, preventing fraud, health and safety or with your consent. We also need to identify the relevant condition for the processing, this will usually be substantial public interest.

Collecting pupil/parent information: Why do we collect and use your information?

The reasons that we collect and use personal information enable us to provide our pupils with an education and to help us run the school. Please refer to **Appendix 2** for examples.

We collect and use information about you in a variety of way including through the school application and admissions process, from correspondence with you and through assessing pupils' educational progress. The ways in which we collect information about you may also include methods as outlined at **Appendix 3**.

We may also collect information about you from third parties such as information from other schools or other third parties engaging with you outside the school.

Whom we share pupil information with

Information about pupils and parents will not be shared with any third party without consent, unless the law allows us to do so. Where it is legally required or necessary (and it complies with data protection law) personal information may be shared with the relevant local authority to meet our legal obligations to share information such as safeguarding concerns or with the Department for Education (DfE). To find out more about the data collection requirements that are placed upon us by the DfE including the data that we share with them go to: https://www.gov.uk/education/data-collection-and-censuses-for-schools. We do not use data for profiling, and only for marketing if you have opted in e.g. to our newsletter.

Further examples of with whom we share data are listed at **Appendix 4**. Examples of how we share data with the Department for Education can be seen in **Appendix 5**.

Third Party Processors

There are occasions when we contract or commission third party organisations or software systems to carry out functions on our behalf and inevitably these functions will involve those third parties processing personal data on our behalf. Examples of the Third Party Processors we use, including what data is processed and why can be found at Appendix 7, full details for each individual school can be obtained from the school office (see Appendix 8 for details)

Storing pupil and parent data

Personal data is stored in line with our data protection policy in a range of different places including within pupils' files and our IT systems including the school's email system.

The information that we create and maintain is kept secure. Once a pupil's education with us has ended, we may retain such information beyond their attendance at the school as deemed necessary and in line with our Records Management policies. A copy of the Retention Schedule within the Records Management Policy can be found on the Trust website or can be obtained by contacting either your school office (see Appendix 7 for details) or from The Partnership Trust, Fosse Way School, Longfellow Road, Bath BA3 3ALTel: 01761 404207; email: office@thepartnershiptrust.com

Transferring data internationally

Where we transfer personal data to a country or territory outside the UK and European Economic Area, we will do so in accordance with data protection law and ensure that we have sufficient safeguards in place.

Requesting access to your personal data

Individuals have the right to request access to information about them that we hold. This is known as making a 'Subject Access Request' (SAR). If you make a subject access request, and if we hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form within a month, unless an extension is necessary on the ground of the complexity of the request

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances. If you would like to make a request, please

contact the school office (see Appendix 8) or The Partnership Trust, Fosse Way School, Longfellow Road, Bath BA3 3AL; Tel: 01761 404 207; email: office@thepartnershiptrust.com

Children have the same rights as adults over their personal data and the school will assess each request on its own merits. Pupils can find out what personal information we hold about them and how we use it by making a subject access request as long we judge that they can properly understand their rights and what this means.

Those with parental responsibility can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (mental capacity will be judged by the school on a case by case basis), or where the child has provided consent and it is considered to be in the best interests of the child. Parents also have the right to make a subject access request with respect to the personal data the school holds about themselves. If you would like to make a request please contact the school office (see Appendix 8 for details) or
The Partnership Trust, Fosse Way School, Longfellow Road, Bath BA3 3AL; Tel: 01761 404 207; email: office@thepartnershiptrust.com

Please note that for schools that are academies, there is no legal right to access a child's educational record and it is up to The Partnership Trust, in consultation with the school, to decide whether to grant such access and it is likely to depend on the contractual relationship between the parent and the school.

Other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- To request to have personal data rectified, if you believe that 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 personal data (i.e. permitting its storage but no further processing) under certain circumstances.
- To object to processing if we are processing your information as part of our public tasks, or on the basis of our legitimate business interests, in which case we will consider your objection, and balance this against our need to process the information.
- To object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics.
- To withdraw your consent to processing
- To have personal information, which you have provided, transmitted electronically to another organisation in certain circumstances.
- Not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect - unless you have agreed or in other limited circumstances.

- A right to seek redress, either through the ICO, or through the courts

Contact and Complaints

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please either contact the school office (see Appendix 8 for details)

Or the Trust's Data Protection Lead, Sue Parfitt Operations Manager at The Partnership Trust, Fosse Way School, Longfellow Road, Bath BA3 3AL;
Tel: 01761 404 207; email: office@thepartnershiptrust.com

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please contact the Trust's Data Protection Lead, (see details above) or our Data Protection Officer One West, Email: i-west@bathnes.gov.uk 01225 395959

You can also complain to the ICO if you are unhappy with how we have used your data, but they would generally expect you to have raised the issue with us first.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Helpline number: 0303 123 1113

ICO website: https://www.ico.org.uk

The Partnership Trust
Longfellow Road
Radstock
BA3 3AL
Tel: 01761 404207
Email:office@thepartnershiptrust.com
Web:www.thepartnershiptrust.co.uk

Appendix 1: Non- exhaustive list of examples of the types of personal data which we collect about pupils and parents

- Personal identifiers and contacts (such as name, unique pupil number, contact details and address).
- Characteristics (such as ethnicity, language, and free school meal eligibility).
- Safeguarding information (such as court orders and professional involvement).
- Special educational needs (including the needs and ranking).
- Medical conditions (such as doctor information, child health, dental health, allergies, medication and dietary requirements).
- Attendance record (such as sessions attended, number of absences, absence reasons and any previous schools attended).
- Test results, assessment and attainment (such as Key Stage 1, Key Stage 2 and phonics results and post 16 courses enrolled on)
- Behavioural information (such as exclusions and any relevant alternative provision put in place).
- Photographs
- CCTV (our CCTV Policy details which schools have CCTV installed).
- We may use online platforms to deliver lessons remotely, if we intend to record the lesson we will let you know.

This list is not exhaustive. To access further details of the categories of personal information we process, please contact the school office (see appendix 8 for details) or

The Partnership Trust, Fosse Way School, Longfellow Road, Bath BA3 3AL;
Tel: 01761 404 207; email: office@thepartnershiptrust.com

Appendix 2: Examples of the purposes for which we process your data

- To support pupil learning and deliver remote learning
- To monitor and report on pupil progress and check whether any extra help is needed.
- To look after pupil wellbeing.
- To keep track of how well we're performing and assess the quality of our services.
- To keep children safe (e.g. food allergies, or emergency contact details).
- To meet the statutory duties placed upon us e.g. for official data collections.
- To promote the school e.g. through our website, prospectuses and press releases.

We may be required to share information about our pupils with the local authority to ensure that they can conduct their statutory duties under the Schools Admission Code, including conducting Fair Access Panels. As part of Multi Academy Trust, The Partnership Trust are the Data Controller for this information and do therefore have access to all personal data that the individual school processes. As in all cases, this access is restricted only to those with a requirement to see it, for example IT support or to act as an investigator in accordance with our Complaints Policy.

Appendix 3: Ways in which we collect pupil and parent information

We collect and use information about you in a variety of way including through the school application and admissions process, from correspondence with you and through assessing pupils' educational progress. The ways in which we collect information about you may also include:

- Registration forms at the start of the school year
- Common Transfer File (CTF) or secure file transfer from previous school.

Appendix 4: Examples of whom we may share your data with where the law permits (non – exhaustive list)

- The Local Authority within which your school sites (Bath and North East Somerset or Somerset)
- Schools that students attend after leaving
- The Department for Education (DfE).
- The National Health Service to support student safety and vaccination programs.
- The pupil's family and representatives.
- Educators and examining bodies.
- The schools' inspector
- Suppliers and service providers so that they can provide a contracted service such as careers and Physical Education provision.
- Central and local government.
- Auditors.
- Survey and research organisations.
- Security organisations.
- Health and social welfare organisations.
- Professional advisers and consultants.
- Counsellors/Educational Psychologists as and when appropriate.
- Charities and voluntary organisations.
- Police forces, courts, tribunals.
- Professional bodies.
- Our Data Protection Officer on occasion, eg to support a Subject Access Request
- Occasionally with school Governors

Appendix 5: How we share information with the Department for Education (DfE) and the National Pupil Database (NPD)

The Partnership Trust and the schools with it are required to provide information about pupils to the DfE as part of statutory data collections such as the school census.

Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the DfE and provides evidence on school performance to inform research.

The database is held electronically so it can be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The DfE may share information from the NPD with other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

Sharing by the DfE:

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

- Schools and 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.

We lawfully share pupil data with the DfE through data collections which is used to

- underpin school funding, which is calculated based upon the numbers of children and their characteristics in each school.

- inform 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).

- support 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

For more information about the DfE's NPD data sharing process, please visit: https://www.gov.uk/data-protection-how-we-collect-and-share-research-dataTo find out more about the data collection requirements placed on us by the DfE via the school census please visit: https://www.gov.uk/education/data-collection-and-censuses-for-schools

To find out more about the NPD, please visit: https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information

If you want to see the personal data held about you by the DfE, you can make a 'subject access request' to the DfE. Further information on how to do this can be found within the DfE'S personal information charter that is published here: https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter

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

Appendix 7: Third Party Processors we use

3rd party processor	Personal data captured	Purpose	Country data is processed in	Who information is shared with
BROMCOM	Pupil name, DOB, Address, ethnicity, special characteristics, photos	School Management information system. Legal requirement to have all information for safeguarding reason	UK, EU or USA (UK Compliance assured)	
Microsoft Teams	Pupil name, class, image and voice, personal comments and opinions	To provide remote learning environment	Republic of Ireland (UK Compliance assured)	
CPOMS	Pupil personal data and special characteristics	Safeguarding reporting tool to fulfil our legal duty to record safeguarding concerns in detail.	UK, EU or USA (UK Compliance assured)	
Class DoJo	Pupil name, class	Communication with parents & carers		

Appendix 8 – contact details for schools within The Partnership Trust

School	Address/email	School	Address/email
Abbot Alphege Academy Beckford Drive Lansdown Bath BA2 9AU	01225 580 281 office@abbot-alphege.org.uk	Moorlands Junior School Chantry Mead Road Bath BA2 2DE	01225 421912 office@moorlands-school.com
Cameley C of E Primary Meadway, Temple Cloud, Bristol BS39 5BD	01761 452644 office@cameleyprimary.org.uk	Nunney First School Catch Road Nunney, Frome Somerset BA11 4NE	01373 836429 office@nunneyschool.com
Castle Primary School 8 Newlands Rd, Keynsham, Bristol BS31 2TS	0117 986 4489 office@castleprimary.uk	Paulton Infant School Paulton Infant School, Plumptre Close, Paulton, BS39 7QY	Tel: 01761 412354 office@paulton-inf.bathnes.sch.uk
Chew Magna Primary School Chew Magna, Bristol BS40 8RQ	01275 332409 office@chewmagnaschool.org.uk	Pensford Primary School Pensford Hill, Pensford, Bristol BS39 4AA	01761 490470 Pensford_Office@pensfordschool.org
Farmborough Church Primary School The Street Farmborough Bath BA20FY	01761 470714 office@farmboroughchurchprimary.org.uk	Roundhill Primary School, Mount Rd, Bath BA2 1LG	01225 424950 office@roundhill-pri.co.uk
Fosse Way School Longfellow Road Midsomer Norton Radstock BA3 3AL	01761 412198 office@fossewayschool.com	St Marys CofE Primary School Old Road, Writhlington RAdstock, Somerset BA3 3NG	01761 434548 office@stmaryswrithlington.co.uk SBM: Tracy Lynch
Hayesdown First School Wyville Road Frome Somerset BA11 2BN	**01373 462718** **office@hayesdownschool.com**	The Mendip School Edmund Rack Road Prestleigh, Shepton Mallet Somerset BA4 4FZ	01749 838040 office@themendipschool.com
Horrington Primary School Bath Road Wells, Somerset. BA5 3EB	01749 673516 office@horringtonprimary.co.uk	Weston All Saints Primary School Broadmoor La, Bath BA1 4JR	01225 421786 office@wasp-school.org.uk
Marksbury C of E Primary School Marksbury BA2 9HS	01761 470628 enquiries@marksburyschool.org.uk	The Partnership Trust Longfellow Road Radstock Bath BA3 3AL Tel: 01761 404207 Email: office@thepartnershiptrust.com	
Moorlands Infant School Chantry Mead Road Bath BA2 2DE	01225 421912 office@moorlands-school.com		