

The Four Stones Multi Academy Trust

Privacy notice for parents/carers

Version Control

Policy author:	Ruth Allen
Policy approved by:	Finance, Audit and Risk Committee
Next policy review date:	Autumn 2022

Version	Date	Details
1.0	8 th May 2019	Privacy notice written to reflect the formation of The Four Stones Multi Academy Trust
2.0	25 th Nov 2020	Updates made: <ul style="list-style-type: none">▪ The creation of one privacy notice for parents/carers for The Four Stones Multi Academy Trust;▪ The creation of a data protection officer (DPO) for the MAT and the addition of a data protection representative (DPR) in each school; and▪ The addition of The De Montfort School to the MAT.
3.0	1 st Sept 2021	Update of DPO and DPR contact information

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data. This privacy notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our school. We, The Four Stones Multi Academy Trust (MAT), are the 'data controller' for the purposes of data protection law. Our data protection officer (DPO) is Jess Hathaway (see 'Contact us' below).

The personal data we hold

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

- Contact details, contact preferences, date of birth, identification document
- Results of internal assessments and externally set test
- Student and curricular record
- Characteristics, such as ethnic background, eligibility for free school meals, or special educational need
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support provider
- Photographs
- CCTV images captured in school
- Behavioural information including achievement and behaviour points
- Destination information including university attended and employment taken after leaving school

We may also hold data about students that we have received from other organisations, including other schools, local authorities and the Department for Education.

Why we use this data

We use this data to:

- Support student learning
- Monitor and report on student progress
- Provide appropriate pastoral care
- Protect student welfare
- Assess the quality of our services
- Comply with the law regarding data sharing
- Support a young person in their transition to a post-16 provider of education or training
- For marketing purposes.

Our legal basis for using this data

Under the UK General Data Protection Regulation (UK GDPR) we only collect and use students' 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 students' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use students' 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 students' personal data overlap, and there may be several grounds which justify our use of this data.

Collecting this information

While the majority of information we collect about students is mandatory, there is some information that can be provided voluntarily. Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

How long we retain and store this data

We keep personal information about students while they are attending our school in accordance with the retention guidelines issued by the Management Society of Great Britain 'Retention Guidelines for Schools' (<https://irms.org.uk/page/SchoolsToolkit>). Please see the 'Data Protection' policy for further details. We are required to retain your son/daughter's information for 25 years from their date of birth as stated in section 2 of the Limitation Act 1980. If your son/daughter leaves the school at 16, then we will retain their student record for a further 9 years. If your son/daughter leaves the school at 18, then we will retain their student record for a further 7 years.

Your son/daughter's information is stored securely and at the end of the retention period is disposed of in a secure way. Our methods of disposal are in accordance with government guidance and are conducted in a way that ensures that reconstruction is highly unlikely.

Data sharing

We do not share information about students with any third party without consent unless the law and our policies allow us to do so. Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about students with:

- Other schools within MAT
- Other schools within our sixth form collaboration (Years 12 and 13 students only) eg Hagley Catholic High School
- Other education providers
- Our local authority to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusion
- The Department for Education
- The student's family and representatives
- Educators and examining bodies
- Our regulator-eg Ofsted
- Suppliers and service providers to enable them to provide the service we have contracted them for-eg catering services
- Financial organisations
- Central and local government
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies

National Pupil Database (NPD)

The NPD is owned and managed by the Department for Education and contains information about students 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.

We are required by law, to provide information about our students 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 student information we share with the department, for the purpose of data collections, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-student-database-user-guide-and-supporting-information>.

The department may share information about our students 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 Department 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 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 student 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 department'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 department has provided student information, (and for which project), please visit the following website: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

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

Youth support services

Once our students reach the age of 13, we also pass student 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

A parent/carer can request that **only** their son/daughter's name, address and date of birth is passed to their local authority or provider of youth support services by informing: King Charles I School: on 01562 512880 or via email at office@kingcharles1.worcs.sch.uk; Haybridge High School: on 01562 886213 or via email at office@haybridge.worcs.sch.uk; The De Monfort School on 01386 442060 or via email at office@tdms.worcs.sch.uk This right is transferred to the student once he/she reaches the age 16.

Parents and students' rights regarding personal data

Under data protection legislation, parents/carers and students 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: Ruth Allen (Data Protection Officer) at school on 01562 512880 or via email at rallen@kingcharles1.worcs.sch.uk. Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer (Ruth Allen) using the contact details below.

Complaints

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 raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact:

- Jess Hathaway is the data protection officer for the MAT and can be contacted via email at dpo@thefourstonesmat.co.uk.
- Jenni Dunn is the data protection representative for King Charles I School and can be contacted via the school office or email at jdunn@kingcharles1.worcs.sch.uk.
- David McQuillan is the data protection representative for Haybridge High School and can be contacted via the school office or email at dmcquillan@haybridge.worcs.sch.uk.
- Matt Sandell is the data protection representative for The De Montfort School and can be contacted via the school office or email at msandell@tdms.worcs.sch.uk.