

Privacy Notice for Parents and Pupils

(How we use pupil information)

This privacy notice explains how we collect, store and use personal data about pupils. Northern Lights Learning Trust is the ‘data controller’ for the purposes of data protection.

Our Data Protection Officer (DPO) function is provided via our agreement with GDPR Sentry. Our Data Protection Lead (DPL) for the Trust is Lisa Cockburn, Chief Operating Officer.

The categories of pupil information that we collect, hold and share includes, but is not restricted to:

- Personal information (such as name, unique pupil number and address)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Special Educational Needs information
- Medical (such as doctor’s information, allergies, medication, dietary requirements etc)
- Behavioural information (such as number of temporary exclusions)
- Assessment information (such as grades and scores)
- Careers information (including further education establishment, course choices etc)
- Safeguarding information (such as court orders, professional involvement, child protection plans, minutes from meetings)

Why we collect and use this information

Northern Lights Learning Trust and its academies, Benedict Biscop CE Academy, Hart Primary School, Holley Park Academy St Peter’s Elwick Primary School, Ian Ramsey Academy, St. Helens Primary School, and Venerable Bede Academy hold the legal right to collect and use personal data relating to our pupils and their families, and we may receive information regarding them from their previous school(s), LA’s and /or the DfE.

We collect and use personal data in order to meet the legal requirements and legitimate interests set out in the GDPR and UK Law, including those in relation to:

- Article 6 and Article 9 of the GDPR
- Education Act 1996
- Regulation 5 of The Education [Information About Individual Pupils] [England] Regulations 2013

The ways we use the pupil data include:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to keep pupils safe
- to meet legal duties placed on us by local and central government
- to assess the quality of our services
- to make decisions relating to how we provide education in a pupil centred way
- to administer admissions waiting lists
- to comply with the law regarding data sharing
- for archiving purposes in the public interest
- for Scientific research
- for Historical research
- for Statistical purposes

We do not currently process any pupils' personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

The lawful basis on which we use this information

We collect and use pupil information under the legal basis of the necessity to carry out tasks in the public interest. This covers our use of personal data for everyday tasks such as – operating the curriculum, storing personal data about our pupils, their parental contacts, staff, timetable information, cashless catering, library systems and annual census requirements.

Special category data is processed under the same legal basis as other information however, is more sensitive and includes information about an individual's:

Race;

Ethnic origin;

Politics;

Religion;

Trade union membership;

Genetics;

Biometrics (where used for ID purposes);

Health;

Sexual orientation

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 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.

Information is provided to us via admission registration forms, Common Transfer files (CTF) from previous school (s) and Child Protection Plans.

Storing pupil data

Personal data held in the academies of Northern Lights Learning Trust, relating to pupils and their families is stored in line with the school's GDPR Data Protection Policy and Retention Schedule. In accordance with the GDPR, the school does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected.

We hold pupil data for statutory purposes for as long as the law dictates. All information is transferred out via a secure site by the DfE when your child transfers to another school. Other information is archived in the public interest for historical, statistical or scientific research, once your child leaves our school.

Who we share pupil information with:

We routinely share pupil information with:

- schools that the pupil's attend after leaving us
- the local authority (LA)
- the Department for Education (DfE)
- the Education Skills Funding Agency (ESFA)
- the National Health Service (NHS)
- the Director for Public Health England (PHE)

Where it is necessary to protect a child, we will also share data with Social Services, medical professionals and/or the Police.

We do not store or transfer personal data to countries outside of Europe.

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 Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

We are required to share information about our pupils with the (DfE) under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

We are required to share information about our pupils with the (NHS) under article 6(1)(e) of the GDPR. This data sharing underpins healthcare requirements for pupils including dental, height and weight and immunisation programmes.

We are required to share information about our pupils with Public Health England (PHE) and their representatives in order to assist in the containment of Coronavirus. We will only share data when it is requested directly by NHS, DfE or Public Health Departments, for use in the track and trace scheme. This shared information will enable identification of people who might have been exposed to the virus and is an important step in containing any spread.

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/datacollection-and-censuses-for-schools>.

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

A parent or guardian can request that **only** their child's name, address and date of birth is passed to their local authority or provider of youth support services by informing us. This right is transferred to the child / pupil once he/she reaches the age 16.

The National Pupil Database (NPD)

The NPD is owned and managed by the Department for Education 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 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 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 department 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 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 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 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 pupil 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>

Requesting access to your personal data

Under data protection legislation, parents and pupils have the right to make a 'subject access request' 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, contact the Headteacher, in the first instance.

Northern Lights Learning Trust's DPO function is carried out via our agreement with GDPR Sentry, who will advise the school accordingly, with support from the DPL.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- 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 Northern Lights Learning Trust are collecting or using your personal data, we request that you raise your concern with us, via the Head Teacher in the first instance.

Alternatively, you can contact the Information Commissioner's Office (ICO) via their website: <https://ico.org.uk/concerns/> or by telephone: 0303 123 1113, Monday-Friday 9am-5pm.