



**embrace
challenge:
expect
excellence**

Daubeney Academy



Pupil Privacy Notice

	July 2020

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1. Pupil Privacy Notice for Older Pupils - Key Information

This notice contains the key information about **how** and **why** we collect your personal information and **what** we do with that information.

The Academy is part of Challenger Multi Academy Trust (the **Trust**). The Trust operates the Academy and is ultimately responsible for how the Academy handles your personal information.

Personal information is information that identifies you and relates to you. For example, information about how well you are doing at the Academy and any information that we need to take care of you. Photographs and videos of you also count as your personal information.

Our primary reason for using your personal information is to provide you with an education.

We set out below examples of the different ways in which we use your personal information and where that personal information comes from.

- Admissions forms give us lots of personal information. We get information from you, your parents or carers, your teachers and other pupils. Your old school also gives us information about you so that we can teach and care for you.
- Sometimes we get information from your doctors and other professionals where we need this to look after you.
- We may need to report some of your information to the government (e.g. the Department for Education). We will need to tell the local authority that you attend the Academy, if you leave the Academy or let them know if we have any concerns about your welfare.
- We will share your academic and (where fair) your behaviour records with your parents or guardian so they can support your schooling.
- We may use photographs or videos of you for the Academy's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the Academy. We may continue to use these photographs and videos after you have left the Academy. Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.
- We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing.
- We use CCTV to make sure the Academy site is safe. CCTV is not used in private areas such as changing rooms.
- We will send you information to keep you up to date with what is happening at the Academy. For example, by sending you information about events and activities taking place (including fundraising events) and the Academy newsletter.

You have the following rights regarding your information:

- Rectification of information held;
- Access to information held;
- Deletion of information in certain circumstances;
- Portability - the transfer of information to you or a third party;
- Restriction of use of information; and
- The right to object to the use of information in certain circumstances.

Challenger Multi Academy Trust
Privacy notice for older pupils

If you have any questions about how we use your personal information, please speak to your form tutor. Alternatively, you can speak to your parents or carers who will talk to us on your behalf.

1.1. Introduction

This notice is to help you understand **how** and **why** we collect your personal information and **what** we do with that information. It also explains the decisions that you can make about your own information. The Academy is part of Challenger Multi Academy Trust (the **Trust**). The Trust operates the Academy and is ultimately responsible for how the Academy handles your personal information.

If you have any questions about this notice please talk to your form tutor.

1.2. What is "personal information"?

Personal information is information that the Academy holds about you and which identifies you. This includes information such as your name, date of birth and address as well as things like exam results, medical details, unique pupil number and behaviour records. We will also hold information such as your religion or ethnic group. CCTV, photos and video recordings of you are also personal information.

1.3. Our legal bases for using your information

This section contains information about the legal bases that we are relying on when handling your information.

The two tables below contain a general description of the different legal bases but we have also used a colour code system so that you can see which bases we are relying on for each of the purposes described at paragraphs 1 to 39 below.

LO

VI

- **Performance of a task carried out in the public interest ("PI")**

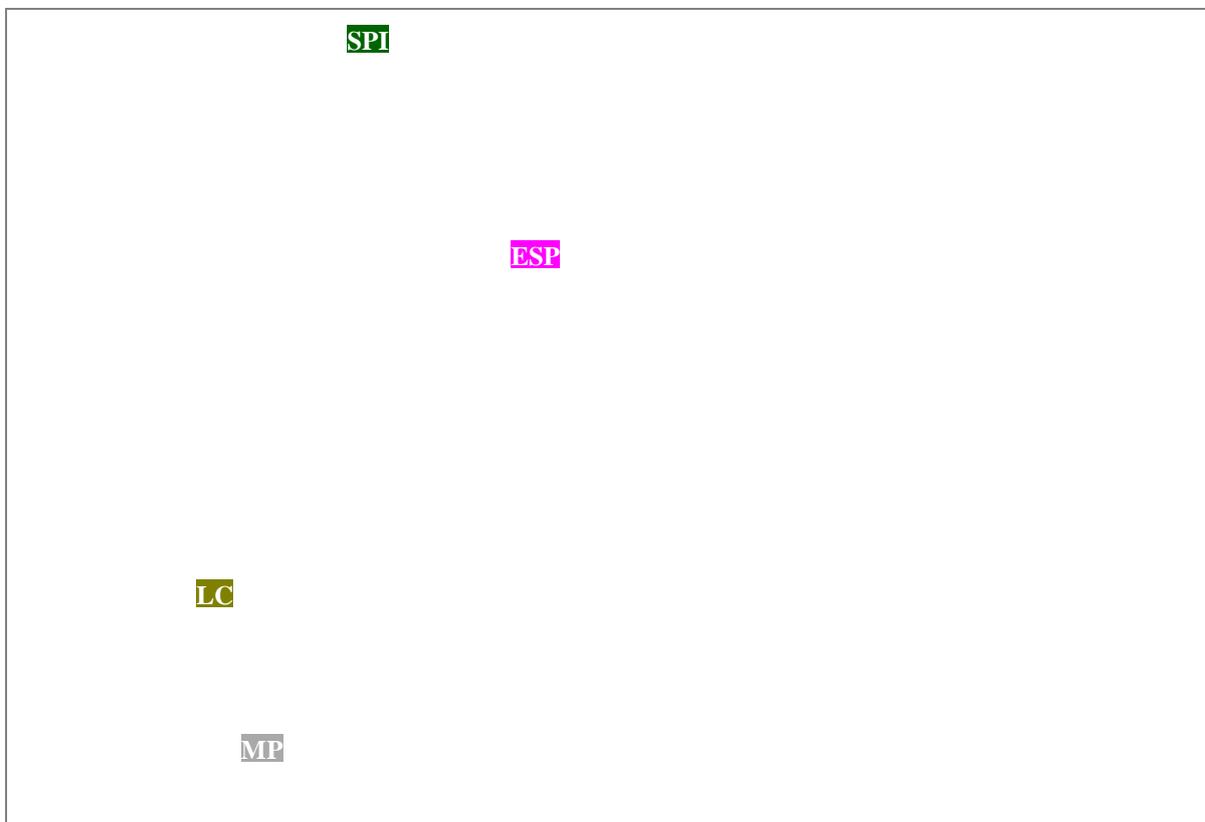
- **Legitimate interests ("LI")**

This means that the Academy is using your information when this is necessary for the Academy's legitimate interests except when your interests and fundamental rights override our legitimate interests. We won't rely on this basis when your interests and fundamental rights override our legitimate interests.

We have a legitimate interest in using your information to:

**promote the Academy including fundraising and publicity;
preserve historical school records.**

The Academy must also comply with an additional condition where it processes special categories of personal information. These special categories include: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information, and information about sex life or orientation. Trade union membership (e.g. if you are a member because of an apprenticeship) is also a special category of personal information. The bases that we are relying on to process special categories of personal information are set out below.



1.4. How and why does the Academy collect and use personal information?

We set out below the different ways in which we use personal information and where this personal information comes from. The letters highlighted in different colours below refer to the legal bases we are relying on. Please see the section above for an explanation.

- The Academy's primary reason for using your personal information is to provide you with an education - **LO**, **PI**, **SPI**.
- The Academy will also use your personal information to safeguard and promote your welfare and the welfare of others (for example, so that we can look after you if you are hurt) - **LO**, **PI**, **SPI**, **ESP**, **MP**.

The admissions forms which your parents complete give us lots of personal information about you such as your name, contact details, disabilities, any particular difficulties you have with work, hobbies and interests, medical information (such as information about an allergy) and family circumstances. We get information from you, your parents or carers, your teachers and other pupils. Your old school also gives us information about how well you did and any difficulties you had so that we can teach and care for you.

Sometimes we get information from your doctors and other professionals where we need this to look after you.

- We will use information about you during the admissions process [• when taking information about you from your parents before you join the school]. We may let your old school know if you have been offered a place at the Academy - LO, PI, SPI.
- We need to tell the appropriate teachers if you have a health issue - LO, PI, SPI.
- If we have information that you suffer from an allergy we will use this information so that we can look after you - PI, SPI, VI, MP.
- We will need to tell your teachers if you have special educational needs or need extra help with some tasks - LO, PI, SPI.
- We will need to share information about you (e.g. about your health and wellbeing) with the school nurse or counsellor - LO, PI, SPI, ESP, MP.
- If we have information that you suffer from a disability we will use information about that disability to provide support - PI, SPI, ESP and in certain circumstances, MP.
- Where appropriate, the Academy will have information about your religious beliefs and practices. For example, if you do not eat certain foods - LO, PI, SPI.
- We use CCTV to make sure the Academy site is safe. CCTV is not used in private areas such as changing rooms - LO, PI, SPI.
- We will be told if you receive free school meals so that we can provide these - LO, PI, SPI.
- We record your attendance and if you have time away from the Academy we record the reason(s) why - LO, PI, SPI.
- The Trust may share information about you with the local authority for the purpose of the preparation, implementation and / or review of your Statement of Special Educational Needs or Education Health and Care Plan - PI, LO, SPI, ESP.
- We will need to report some of your information to the government (e.g. the Department for Education). We will need to tell the local authority that you attend the Academy, if you leave the Academy or let them know if we have any concerns about your welfare - LO, PI, SPI, ESP.
- We are legally required to provide the Department for Education with certain information about you and your classmates. Some of this information will be stored on the National Pupil Database. Organisations can request information from the National Pupil Database which includes information about you. But they are only allowed to do this for limited purposes and they must be very careful about how they use your information. More information can be found here - <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information> - LO, PI, SPI
- We may need to share information about you with the Health and Safety Executive (a government organisation) if there is a health and safety issue at the Trust - LO, PI, SPI.
- We will need information about any court orders or criminal matters which relate to you. This is so that we can safeguard your welfare and wellbeing and the other pupils at the Academy - LO, PI, SPI.
- Depending on where you will go when you leave us we will provide your information to other schools, colleges and universities, UCAS or potential employers. For example, we will share information about your exam results and provide references - LO, PI, SPI.
- We may pass on information to your next school which they need to look after you, for example, information about any concerns we have had about your welfare - LO, PI, SPI, ESP.
- When you take public examinations (e.g. GCSEs) we will need to share information about you with examination boards. For example, if you require extra time in your exams - LO, PI, SPI.

Challenger Multi Academy Trust

Privacy notice for older pupils

- The Learning Records Service (which is part of the government) will give us your unique learning number. We may receive details about you (e.g. your qualifications) from the Learning Records Service - **LO, PI, SPI, ESP**.
- We will provide your information to the local authority so that they can provide careers advice. We may also share your information with the provider of youth support services - **LO, PI, SPI**.
- The Academy is sometimes inspected to make sure that we are continuing to be a good school. We will have to make your information available to the inspectors to help them to carry out their job - **LO, PI, SPI**.
- If someone makes a complaint about how the Academy has behaved we may need to use your information to deal with this appropriately. For example, if your parents complain that we have not looked after you properly - **LO, PI, SPI**.
- We may need to share information about you with the police or our legal advisers if something goes wrong or to help with an enquiry. For example, if one of your classmates is injured at the Academy or if there is a burglary - **LO, PI, SPI, LC**.
- We use consultants, experts and other advisors to assist the Academy in fulfilling its obligations and to help run the Academy properly. We will share your information with them if this is relevant to their work - **LO, PI, SPI**.
- If you have misbehaved in a serious way, we may need to share information with the police and we may need to use information about the action taken by the police - **LO, PI, SPI, ESP**.
- We may share some information with our insurance company to make sure that we have the insurance cover that we need or in connection with an actual or possible claim - **LO, PI, SPI, LC**.
- We may use your information when responding to an incident, for example, if something is published on social media which concerns the Academy - **PI, LI**.
- We will share your academic and (where fair) your behaviour records with your parents or carers so they can support your schooling - **LO, PI, SPI, ESP**.
- If ever in the future, we are considering restructuring the multi academy trust, we may share your information with the other parties involved and with the relevant professional advisors - **PI**.
- We will monitor your use of email, the internet and mobile electronic devices e.g. iPads. This monitoring is sometimes carried out using computer software. In certain circumstances we will look at the content of your communications (e.g. emails and text messages). We monitor and look at your use of technology (e.g. your use of your phone) to check that you and your classmates are not misbehaving, at risk of harm or for other good reasons. If you would like more information about this you can read the acceptable use of IT and email policy or speak to your form tutor - **LO, PI, SPI**.
- We may use information about you if we need this for historical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the Academy - **LI**.
- We may use photographs or videos of you for the Academy's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the Academy. We may continue to use these photographs and videos after you have left the Academy - **LI**.
- Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson or as part of an art lesson - **LI**.

If you have concerns about us using photographs or videos of you please speak to your form tutor.

- We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing - **LI**.
- The Academy must make sure that our computer network is working well and is secure. This may involve information about you, for example, our anti-virus software might scan files containing information about you - **LO, PI, SPI**.
- We may share information about you with the other academies in the Trust. For example, how well you have behaved at the Academy and your test results - **LO, PI, SPI**.]
- From time to time, we may use a third party to provide activities such as an external sports coach. We may share your information with them, for example, to tell them what sports you are good at- **PI**.
- Some of the records the Trust keeps and which contain your personal information may be used by the Trust (or by someone else such as the government) to check that the Trust has been running good schools - **PI, SPI**.
- We also keep some information indefinitely for archiving purposes (this is known as "archiving in the public interest" under data protection law) and for historical research purposes - **LI, PI**.
 - This includes the Trust's interest in research; supporting long-term accountability; enabling the discovery and availability of the Trust and the wider school community's identity, memory, culture and history; enabling the establishment and maintenance of rights and obligations and of precedent decisions; educational purposes; and commercial and non-commercial re-use.
 - For example, we keep some old photographs so that we have a record of what the schools in the Trust were like in the past. Information held in our archive may be made publicly available but this would only be done in compliance with data protection laws. Please speak to your form tutor if you would like more information.
- We will only share your information with other people and organisations when we have a good reason to do so. In exceptional circumstances we may need to share it more widely than we would normally.
- We sometimes use contractors to handle personal information on our behalf. The following are examples:
 - IT consultants who might access information about you when checking the security of our IT network;
 - we use software, apps and websites to help us with teaching, and to help us provide pastoral support to you and your classmates; and
 - we use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the Academy site.

If you have any questions about any of the above, please speak to your form tutor.

1.5. Criminal offence information

In exceptional circumstances, we may use information about criminal convictions or offences. We will only do this where the law allows us to. This will usually be where such processing is necessary to carry out our obligations, to exercise our rights or to look after you and your classmates.

Less commonly, we may use information relating to criminal convictions and offences where it is necessary in relation to legal claims, where it is necessary to protect you and your classmates and you are not capable of giving your consent, or where you have already made the information public.

1.6. More than one basis

As you will see from the information above, in some cases we will rely on more than one basis above for a particular use of your information. In addition, we may move from one of the legal bases listed above to another as circumstances change. For example, if we become really worried about your wellbeing, we may start to rely on legal obligation to share personal information with the local authority in addition to the other legal bases which are noted for looking after you.

1.7. Consent

We may ask for your consent to use your information in certain ways as an alternative to relying on any of the bases in the table above. For example, we may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on our legitimate interests or it being in the public interest. If we ask for your consent to use your personal information you can take back this consent at any time.

Any use of your information before you withdraw your consent remains valid. Please speak to your form teacher if you would like to withdraw any consent that you have given.

1.8. Sending information to other countries

In certain circumstances, we may send your information to countries which do not have the same level of protection for personal information as there is in the UK. For example, we may store your information on cloud computer storage based overseas.

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en

If the country that we are sending your information to is not on the list, or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland), then it might not have the same level of protection for personal information as there is in the UK.

We will provide you with details about the safeguards which we have in place outside of this privacy notice. If you have any questions about the safeguards that are in place please contact your form tutor.

1.9. For how long do we keep your information?

We keep your information for as long as we need to in order to educate and look after you. We will keep some information after you have left the Academy, for example, so that we can find out what happened if you make a complaint.

In some cases we may keep your information for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

Please see our Information and Records Retention Policy for more detailed information.

1.10. What decisions can you make about your information?

Data protection legislation gives you a number of rights regarding your information. Your rights are as follows:

- **Rectification:** if information the Trust holds about you is incorrect you can ask us to correct it.
- **Access:** you can also ask what information we hold about you and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to.
- **Deletion:** you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.

- **Portability:** you can request the transfer of your information to you or to a third party in a format that can be read by computer in certain circumstances. This applies where (a) the information has been provided by you; (b) the basis that we are relying on to process your information is consent or contract (please see "Our legal bases for using your information" above); and (c) the information is being processed by us on computer.
- **Restriction:** our use of information about you may be restricted to simply storing it in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.
- **Object:** you may object to us using your information where:
 - we are using it for direct marketing purposes
 - the legal basis on which we are relying is either legitimate interests or performance of a task carried out in the public interest. Please see the section "Our legal bases for using your information" above; and
 - we are using it for historical or scientific research purposes or statistical purposes.

Your form teacher can give you more information about your data protection rights.

1.11. Further information and guidance

This notice is to explain how we look after your personal information. Your form teacher can answer any questions which you might have.

Please speak to your form teacher if:

- you would like to exercise any of your rights listed above; or
- you would like us to update the information we hold about you; or
- you would prefer that certain information is kept confidential.

The Academy has a Data Protection Officer who can be contacted by email

(bwelton@challengermat.org) The Data Protection Officer monitors and advises on the Academy's data protection compliance.

You can ask your form teacher to speak to the Data Protection Officer or speak to the Data Protection Officer yourself. Alternatively, you can ask your parents or carers to speak to us on your behalf if you prefer.

If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office: ico.org.uk. If you do have any concerns about how we have handled your personal information we would kindly ask that you contact us in the first instance before you speak to the ICO so that we have an opportunity to put things right.

How We Use Your Child's Information Privacy Notice for Younger Pupils

Challenger Multi Academy Trust

July 2020

2. Pupil Privacy Notice for parents of younger pupils - Key Information

This notice contains the key information about how and why we collect your child's personal information and what we do with that information.

The Academy is part of Challenger Multi Academy Trust (the **Trust**). The Trust operates the Academy and is ultimately responsible for how the Academy handles your personal information.

Personal information is information that identifies your child as an individual and relates to your child. For example, information about how well your child is doing at the Academy and any information that we need to take care of your child. Photographs and videos of your child also count as their personal information.

Our primary reason for using your child's personal information is to them with an education. We set out below examples of the different ways in which we use your child's personal information and where that personal information comes from.

- Admissions forms give us lots of personal information about your child. We get information from you, your child's teachers and other pupils. Your child's old school also gives us information about your child so that we can teach and care for your child.
- Sometimes we get information from your child's doctors and other professionals where we need this to look after your child.
- We may need to report some of your child's information to the government (e.g. the Department for Education). We will need to tell the local authority that your child attends the Academy, if your child leaves the Academy or let them know if we have any concerns about your child's welfare.
- We may use photographs or videos of your child for the Academy's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the Academy. We may continue to use these photographs and videos after your child has left the Academy.
- Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson.
- We use CCTV to make sure the Academy's site is safe. CCTV is not used in private areas such as changing rooms.

Your child has the following rights regarding their information:

- Rectification of information held;
- Access to information held;
- Deletion of information in certain circumstances;
- Portability - the transfer of information to you or a third party;
- Restriction of use of information; and
- The right to object to the use of information in certain circumstances.

The Data Protection Officer is the person responsible at our Academy for managing how we look after personal information. The Data Protection Officer can answer any questions which you may have about how we use your child's personal information.

2.1. Introduction

This notice is to help you understand **how** and **why** we collect your child's personal information and **what** we do with that information. It also explains the decisions that you can make about your child's information.

The Trust operates the Academy and is ultimately responsible for how the Academy handles personal information about your child.

We are giving you this notice because you are able to exercise your child's data protection rights on their behalf. When your child is older (usually when they reach the age of 12) they will be considered mature enough to exercise their own data protection rights.

If you have any questions about this notice please talk to the Data Protection Officer.

2.2. What is "personal information"?

Personal information is information that the Academy holds about your child and which identifies your child.

This includes information such as their date of birth and address as well as things like exam results, medical details, unique pupil number and behaviour records. We will also hold information such as your child's religion or ethnic group. CCTV, photos and video recordings of your child are also personal information.

2.3. Our legal grounds for using your child's information

This section contains information about the legal bases that we are relying on when handling your child's information.

The two tables below contain a general description of the different legal bases but we have also used a colour code system so that you can see which bases we are relying on for each of the purposes described at paragraphs 1 to 36 below.

LO

VI

- Performance of a task carried out in the public interest ("PI")

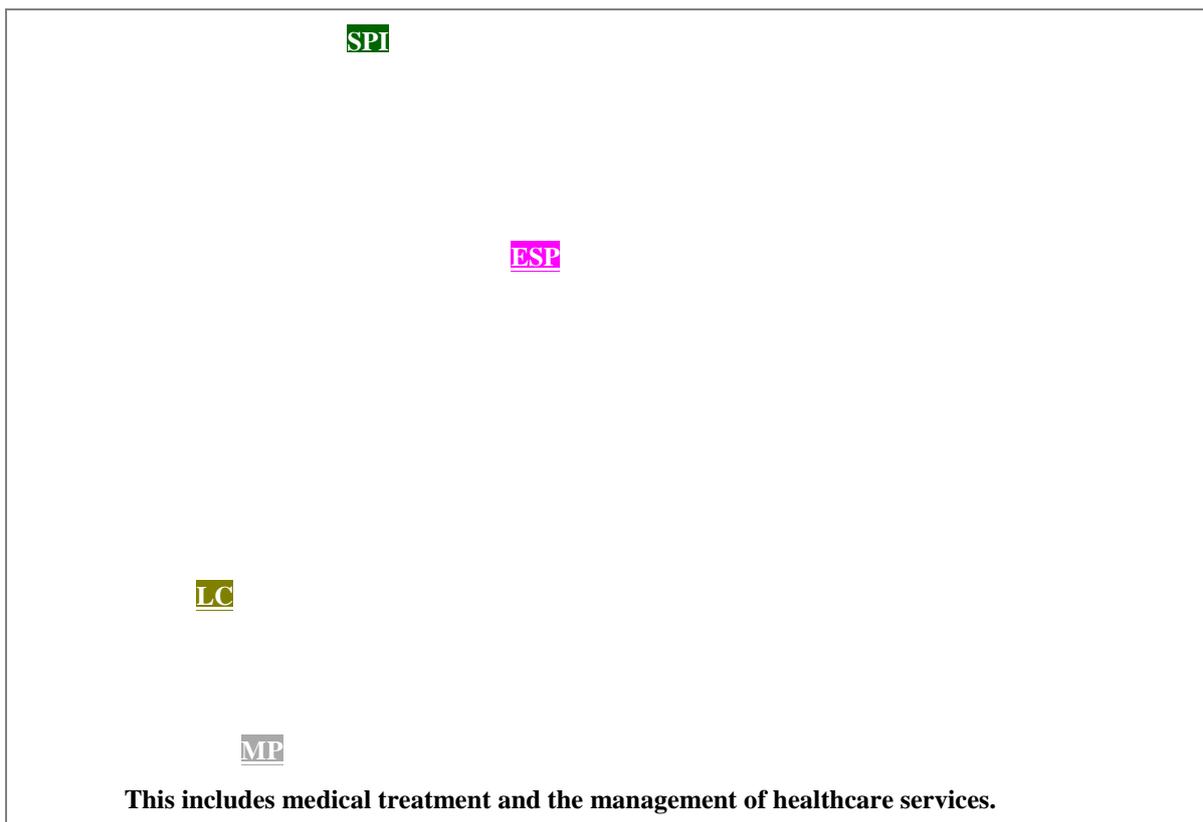
- Legitimate interests ("LI")

This means that the Academy is using your child's information when this is necessary for the Academy's legitimate interests except when your child's interests and fundamental rights override our legitimate interests. We won't rely on this basis when your child's interests and fundamental rights override our legitimate interests.

We have a legitimate interest in using your child's information to:

promote the Academy including fundraising and publicity;
preserve historical school records.

-
- The Academy must also comply with an additional condition where it processes special categories of personal information. These special categories include: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, genetic information, biometric information, health information, and information about sex life or orientation. The bases that we are relying on to process special categories of personal information are set out below.



-

2.4. How and why does the Academy collect and use your child's personal information?

We set out below the different ways in which we use personal information and where this personal information comes from.

- Our primary reason for using your child's information is to provide your child with an education - **LO**, **PI**, **SPI**.
- The Trust will also use your child's personal information to safeguard and promote your child's welfare and the welfare of others (for example, so that we can look after your child if they are hurt) - **LO**, **PI**, **SPI**, **ESP**, **MP**.

The admissions forms which you complete give us personal information about your child, such as contact details, disabilities, any particular difficulties they have with work, hobbies and interests, medical information (such as information about an allergy) and family circumstances. We get information from your child, his / her teachers and other pupils. Your child's old school also gives us

information about how well your child did and any difficulties they had if we need this to teach and care for them.

Sometimes we get information from your child's doctor and other professionals where we need this to look after your child.

- We will use information about your child during the admissions process e.g. when taking information about your child before they join the academy trust. We may let your child's previous school know if they have been offered a place at the Academy - LO, PI, SPI.
- We need to tell all appropriate members of staff if your child has a health issue - LO, PI, SPI.
- If we have information that your child suffers from an allergy we will use this information so that we can look after your child - PI, SPI, VI, MP.
- We will tell your child's teachers if he or she has special educational needs or requires extra help with some tasks - LO, PI, SPI.
- We will need to share information about your child (e.g. about their health and wellbeing) with the [• school nurse or counsellor] - LO, PI, SPI, ESP, MP.
- If we have information that your child suffers from a disability we will use information about that disability to provide support - PI, SPI, ESP and in certain circumstances, MP.
- Where appropriate, the Academy will have information about your religious beliefs and practices. For example, if your child does not eat certain foods - LO, PI, SPI.
- We use CCTV to make sure the Academy site is safe. CCTV is not used in private areas such as changing rooms - LO, PI, SPI.
- We will be told if your child is eligible to receive free school meals so that we can provide these - LO, PI, SPI.
- We record your child's attendance and if he or she has time away from the Academy we record the reason(s) why - LO, PI, SPI.
- The Trust may share information about your child with the local authority for the purpose of the preparation, implementation and / or review of their Statement of Special Educational Needs or Education Health and Care Plan - PI, LO, SPI, ESP.
- We will need to report some of your child's information to the government (e.g. the Department for Education). We will need to tell the local authority that your child attends the Academy, if they leave the Academy or let them know if we have any concerns about your child's welfare - LO, PI, SPI, ESP.
- We are legally required to provide the Department for Education with certain information about your child. Some of this information will be stored on the National Pupil Database. Organisations can request information from the National Pupil Database which includes information about your child. But they are only allowed to do this for limited purposes and they must be very careful about how they use your child's information. More information can be found here - <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information> - LO, PI, SPI
- We may need to share information about your child with the Health and Safety Executive (a government organisation) if there is a health and safety issue at the Academy - LO, PI, SPI.
- When we are inspected by Ofsted we will have to make your child's information available to the inspectors to assist them with their inspection - LO, PI, SPI.
- If the Academy receives a complaint or grievance which involves your child we will need to use their information to deal with this appropriately. For example, if you make a complaint or if another parent complains about an issue which involves your child - LO, PI, SPI.

- We will need information about any court orders or criminal petitions which relate to your child. This is so that we can safeguard your child's welfare and wellbeing and the other pupils at the Academy - **LO, PI, SPI**.
- Depending on where your child will go when they leave us we will provide their information to [• other schools and colleges]. For example, we will share information about your child's exam results and provide references - **LO, PI, SPI**.
- If your child has a safeguarding file, we are legally required to pass this file to their next school - **LO, PI, SPI, ESP**.
- If your child takes public examinations we will need to share information about them with examination boards. For example, if your child requires extra time in exams - **LO, PI, SPI**.
- We may need to share information with the police or our legal advisers if something goes wrong or to help with an enquiry. For example, if one of your child's classmates is injured at the Academy or if there is a burglary - **LO, PI, SPI, LC**.
- We use consultants, experts and other advisors to assist the Academy in fulfilling its obligations and to help run the Academy properly. We will share your child's information with them if this is relevant to their work - **LO, PI, SPI**.
- If your child has misbehaved in a serious way, and the police have become involved, we will need to use information about the action taken by the police - **LO, PI, SPI**.
- We may share some information with our insurance company to make sure that we have the insurance cover that we need or in connection with an actual or possible claim - **LO, PI, SPI, LC**.
- [• If your child has misbehaved in a serious way, we may need to share information with the police and we may need to use information about the action taken by the police - **LO, PI, SPI, ESP**.]
- We may use your child's information when responding to an incident, for example, if something is published on social media which concerns the Academy - **PI, LI**.
- We will share your child's academic and (where fair) their behaviour records with you so you can support their schooling - **LO, PI, SPI**.
- If ever in the future, we are considering restructuring the multi academy trust, we may share your child's information with the other parties involved and with the relevant professional advisors - **PI**.
- We will monitor your child's use of email, the internet and mobile electronic devices e.g. iPads. This monitoring is sometimes carried out using computer software. This is to check that your child is not misbehaving when using this technology or putting themselves at risk of harm. If you would like more information about this you can read the acceptable use of IT and email policy or speak to your child's teacher - **LO, PI, SPI**.
- We may use information about you if we need this for historical research purposes. For example, if we consider the information might be useful if someone wanted to write a book about the School - **LI**.
- We may use photographs or videos of your child for the Academy's website and social media sites or prospectus to show prospective pupils what we do here and to advertise the Academy. We will continue to use these photographs and videos after your child has left the Academy - **LI**.
- Sometimes we use photographs and videos for teaching purposes, for example, to record a drama lesson or as part of an art lesson - **LI**.

- If you have any concerns about us using photographs or videos of your child please speak to your child's teacher.
- We publish our public exam results, sports fixtures and other news on the website and put articles and photographs in the local news to tell people about what we have been doing - LI.
- The Academy must make sure that its computer network is working well and is secure. This may involve information about your child, for example, the anti-virus software might scan files containing information about your child - LO, PI, SPI.
- We may share information about your child with the other academies in the Trust. For example, how well your child has behaved at the Academy and their test results - LO, PI, SPI.]
- From time to time, we may use a third party to provide activities such as an external sports coach. We may share your child's information with them, for example, to tell them what sports you are good at- PI.
- Some of the records the Trust keeps and which contain your child's personal information may be used by the Trust (or by someone else such as the government) to check that the Trust has been running good schools - PI, SPI.
- We also keep some information indefinitely for archiving purposes (this is known as "archiving in the public interest" under data protection law) and for historical research purposes - LI, PI.
 - This includes the Trust's interest in research; supporting long-term accountability; enabling the discovery and availability of the Trust and the wider school community's identity, memory, culture and history; enabling the establishment and maintenance of rights and obligations and of precedent decisions; educational purposes; and commercial and non-commercial re-use.
 - For example, we keep some old photographs so that we have a record of what the schools in the Trust were like in the past. Information held in our archive may be made publicly available but this would only be done in compliance with data protection laws. Please speak to your child's teacher if you would like more information.
- We will only share your child's information with other people and organisations when we have a good reason to do so. In exceptional circumstances we may need to share it more widely than we would normally.
 - We sometimes use contractors to handle personal information on our behalf. The following are examples:
 - IT consultants who might access information about your child when checking the security of our IT network;
 - we use software, apps and websites to help us with teaching, and to help us provide pastoral support to your child; and
 - we use third party "cloud computing" services to store some information rather than the information being stored on hard drives located on the Academy site.

If you have any questions about the above, please speak to your child's teacher.

2.5. Criminal offence information

- In exceptional circumstances, we may use information about criminal convictions or offences. We will only do this where the law allows us to. This will usually be where such processing is necessary to carry out our obligations, to exercise our rights or to look after our pupils.

- Less commonly, we may use information relating to criminal convictions and offences where it is necessary in relation to legal claims, where it is necessary to protect you and your classmates and you are not capable of giving your consent, or where you have already made the information public.

2.6. More than one basis

As you will see from the information above, in some cases we will rely on more than one basis for a particular use of your child's information. In addition, we may move from one of the legal bases listed above to another as circumstances change. For example, as a safeguarding matter becomes more serious, we may start to rely on legal obligation to share personal information with the local authority in addition to the other legal bases which are noted for safeguarding purposes.

2.7. Consent

- We may ask for your consent to use your child's information in certain ways as an alternative to relying on any of the bases in the table above. For example, we may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on our legitimate interests or it being in the public interest. If we ask for your consent to use your child's personal information you can take back this consent at any time.
- Any use of your child's information before you withdraw your consent remains valid. Please speak to your child's teacher if you would like to withdraw any consent given.

2.8. Sending information to other countries

In certain circumstances, we may send your child's information to countries which do not have the same level of protection for personal information as there is in the UK. For example, we may store your child's information on cloud computer storage based overseas.

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en

If the country that we are sending your child's information to is not on the list, or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland), then it might not have the same level of protection for personal information as there is in the UK.

We will provide you with details about the safeguards which we have in place outside of this privacy notice. If you have any questions about the safeguards that are in place please contact the Data Protection Office].

2.9. For how long do we keep your child's information?

We keep your child's information for as long as we need to in order to educate and look after them. We will keep certain information after your child has left the Academy, for example, so that we can find out what happened if you make a complaint.

In some cases we may keep your child's information for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law. Please see our Information and Records Retention Policy for more detailed information.

2.10. What decisions can you make about your child's information?

Data protection legislation gives your child a number of rights regarding their information which you may exercise on their behalf. Your child's rights are as follows:

- **Rectification:** if information the Trust holds about your child is incorrect you can ask us to correct it.
- **Access:** you can also ask what information we hold about your child and be provided with a copy. This is commonly known as making a subject access request. We will also give you extra information, such as why we use this information about your child, where it came from and what types of people we have sent it to.
- **Deletion:** you can ask us to delete the information that we hold about your child in certain circumstances. For example, where we no longer need the information.
- **Portability:** you can request the transfer of your child's information to you or to a third party in a format that can be read by computer in certain circumstances. This applies where (a) the information has been provided by you; (b) the basis that we are relying on to process your child's information is consent or contract (please see "Our legal bases for using your information" above); and (c) the information is being processed by us on computer.
- **Restriction:** our use of information about your child may be restricted to simply storing it in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.
- **Object:** you may object to us using your child's information where:
 - we are using it for direct marketing purposes
 - the legal ground on which we are relying is either legitimate interests or performance of a task carried out in the public interest. Please see the section "Our legal grounds for using your child's information" above;
 - we are using it for historical or scientific research purposes or statistical purposes.

The Data Protection Officer can give you more information about your child's data protection rights.

2.11. Further information and guidance

This notice is to explain how we look after your child's personal information. The Data Protection Officer] can answer any questions which you might have.

Please speak to the Data Protection Officer if:

- you would like to exercise any of your child's rights listed above; or
- you would like us to update the information we hold about your child; or
- you would prefer that certain information is kept confidential.

If you consider that we have not acted properly when using your child's personal information you can contact the Information Commissioner's Office: ico.org.uk. If you do have any concerns about how we have handled your child's personal information we would kindly ask that you contact us in the first instance before you speak to the ICO so that we have an opportunity to put things right.