



## **Privacy Notice – Pupil/Student Information**

The Accord Multi Academy Trust (the Trust) is the Data Controller of the personal information you provide to us. This means the Trust determines the purposes for which and the manner in which, any personal data relating to pupils, students, their families and emergency contacts is to be processed.

If you want to know anything about what we do with information about you, then please ask your teacher, or speak to your parent/carer and ask them to contact the Academy. We also have a person called the Data Protection Officer who works with your Academy. They can answer questions you have about what the school does with your information. If you or your parent/carer want to speak to them, you can contact them via: [dataprotection@accordmat.org](mailto:dataprotection@accordmat.org).

### **Policy Statement**

During your time with us, we will use information that we gather in relation to you for various purposes. Information that we hold in relation to you is known as “personal data”. This will include data that we obtain from you directly and data about you which we obtain from other people and organisations.

We might also need to continue to hold your personal data for a period of time after you have left the school. Anything that we do with your personal data is known as “processing”.

This document sets out what personal data we will hold about you, why we process that data, who we share this information with, and your rights in relation to your personal data processed by us.

### **The categories of pupil/student information that we collect, hold and share include:**

- Personal information (such as name, unique pupil number and address, telephone and email contact details);
- Characteristics (such as gender, language, nationality, country of birth and free school meal eligibility);
- Attendance information (such as sessions attended, number of absences and absence reasons);
- Assessment information (such as internal assessment results, internal examinations results, national curriculum assessment results, external examination results);
- Relevant medical information;
- Information relating to Special Educational Needs and Disability;
- Behavioural information (such as number of sanctions, detentions, fixed term exclusions, permanent exclusions);

- Images, audio and video recordings;
- Details of previous/future schools;
- CCTV images;
- Post 16 Learning information (if applicable).

We will also collect, hold, share and otherwise use some information about you which is called “special category personal data” and we will take extra care to make sure that this is kept safe:

- Racial or ethnic origin;
- Religious beliefs;
- Medical / health information;
- Sexual life;
- Sexual orientation;
- Genetic and biometric data;
- Special educational needs and disability information;
- Information relating to keeping you safe;
- Dietary requirements.

### **Why we collect and use this information**

We use pupil data:

- to support pupil learning;
- to monitor and report on pupil progress;
- to provide appropriate pastoral care;
- to assess the quality of our services;
- to safeguard pupils;
- to support pupil learning through professional development of our school workforce;
- to comply with the law regarding data sharing.

### **Collecting pupil information**

We get this information from:

- you;
- your parents/carers;
- teachers and other staff; and
- people from other organisations, like doctors or the local authority, for example.

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 (GDPR), we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

We may receive information regarding pupils, their families and emergency contacts from their previous school, Local Authority and/or the DfE.

We collect most of the information from admissions forms, permissions forms/permissions systems (e.g. MCAS) and regular updates.

### **The lawful basis on which we use this information**

The Accord Multi Academy Trust holds the legal right to collect and use personal data relating to pupils, their families and their emergency contacts.

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

- Article 6 of the GDPR;
- Article 9 of the GDPR;
- Regulation 7 of the Education (Information about Individual Pupils) (England) Regulations 2013;
- Education Act 1996.

The Accord Multi Academy Trust considers that it is acting in the public interest when providing Education.

### **Why do we use special category personal data?**

We may need to use the information about you which is special (mentioned above) where there is a specific interest to do so, for example health and social care purposes (**Article 9 h**) or to provide you with equal opportunities and treatment (**Article 9,g**). We will also use this information where you have given us permission to do so (**Article9,a**). There may also be circumstances where we need to use your information in relation to legal claims (**Article 9 f**), or to protect your vital interests and where you are unable to provide your consent (**Article 9 c**).

We process information under the headings of legitimate interests so that we can:

- Provide pupils with an education;
- Safeguard and promote the welfare of all pupils;
- Promote the objects and interests the Trust;
- Facilitate the efficient operation of the Academies within the Trust, and the Trust itself;
- Ensure that all relevant legal obligations of the Trust are complied with.

We may also process personal data where there is a legal obligation (where we have to disclose this information), or a vital interest (to protect the interests of that person e.g. if they were seriously injured). We may also process data for legal claims and medical purposes.

We may ask for consent to use your information in certain ways. We do this using Permission Forms or by collecting data in Bromcom (MCAS). If we ask for consent, you may withdraw

your consent at any time. Any use of your information before you withdraw consent remains valid.

### **Storing pupil data**

In primary academies, pupil data is passed onto the secondary education provider as part of the transition process in line with our Retentions Policy.

In secondary academies, we hold pupil data until 31<sup>st</sup> August following their 25<sup>th</sup> birthday in line with our Retentions Policy.

In some circumstances, we may keep data for a longer time. We would only do this if we had good reason, and only if we are allowed to do so under Data Protection legislation.

If you would like more information about how long we keep information, please ask for a copy of our Retention Policy by contacting [dataprotection@accordmat.org](mailto:dataprotection@accordmat.org). When we no longer need to retain information, we will destroy or delete it in a secure manner.

### **Who we share pupil information with?**

We routinely share pupil information with (where there is a legitimate reason to do so in line with GDPR):

- schools/academies/Further Education/universities or other education settings that the pupils may attend after leaving us;
- our local authority (Wakefield Council) and other local authorities if applicable;
- the Department for Education (DfE);
- School Nurse;
- NHS;
- UCAS;
- Third parties, including software providers, with whom we have a data sharing agreement, to support pupils' educational experience;
- Third parties, including software providers, with whom we have a data sharing agreement, to support the operation of the academies and Trust;
- For pupils over the age of 16 we share information with their parents/carers as part of our Home Academy agreement;
- contractors, to enable them to provide an effective service to the school, such as school meal providers or external tutors;
- non-LA professionals, medical professionals, educational psychologists, school nurse, school Counsellor or CAMHS (Child and Adolescent Mental Health Service).

The information disclosed to these people/services may include sensitive personal information about you. Usually this means information about your health and any special

educational needs or disabilities which you have. We do this because these people need the information so that they can support you/the academy/Trust.

### **Keeping this information safe**

It is very important that only people who need to use your information can see it. The academy/Trust keeps your information safe by:

- Encryption and password protection;
- Network controlled permissions;
- Secure disposal;
- We do not normally transfer your information to a different country, which is outside the European Economic Area.

### **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 do not sell any personal data to third parties.

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.

### **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/datacollectionand-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 of 16.

## **Pupils aged 16+**

We will also share certain information about pupils aged 16+ with 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:

- post-16 education and training providers;
- youth support services;
- careers advisers.

For more information about services for young people, please visit [www.wakefield.gov.uk](http://www.wakefield.gov.uk).

## **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/nationalstudentdatabase-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-student-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 request access to information about them that we hold in a readily accessible format. To make a request for your personal information, or be given access to your child's educational record contact: [dataprotection@accordmat.org](mailto:dataprotection@accordmat.org). You also have the right to:

- be informed about how Accord Multi Academy Trust uses your personal data;
- request access to the personal data that Accord Multi Academy Trust holds;
- request that your personal data is amended if it is inaccurate or incomplete;
- request that your personal data is erased where there is no compelling reason for its continued processing;
- request that the processing of your data is restricted;
- 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;
- when the processing of your data is based on your consent, you have the right to withdraw this consent at any time.

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance at [dataprotection@accordmat.org](mailto:dataprotection@accordmat.org).

Alternatively, you can contact the Information Commissioner's Office (ICO) at [www.ico.org.uk](http://www.ico.org.uk).

### **Contact**

If you would like to discuss anything contained in this Pupil Privacy Notice, please contact:

**Data Protection Officer**

Accord Multi Academy Trust  
Storrs Hill Road  
Ossett  
WF5 0DG

[dataprotection@accordmat.org](mailto:dataprotection@accordmat.org)

**Date: January 2022**