

Privacy Notice for Parents and Pupils

How we use your information 2018/19

Who are we?

Tove Learning Trust is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Tove Learning Trust is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: Z7119841.

What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our pupils and parents.

What personal information do we process about pupils and parents?

The pupil and parent information that we collect, hold and share includes:

- Personal information including a pupil's name, date of birth, unique pupil number and home address
- Characteristics such as ethnicity, language, nationality, country of birth and free school meal eligibility
- Medical and health information such as doctors information, allergies, medication and dietary requirements.
- Attendance information such as sessions attended, number of absences and absence reasons.
- Educational information including records of work, assessment results, details of pupils' special educational needs, exclusions/behavioural information, post-16 learning information.
- Contact information for parents, carers and other relatives, including telephone numbers, home addresses and e-mail addresses.
- Information about a child's home life, where required as part of necessary safeguarding and welfare processes.

Why we use and collect pupil information?

The personal data collected is essential, in order for the school to fulfil their official functions and meet legal requirements.

We collect, use and process pupil and parent information on a lawful basis (under the General Data Protection Regulation (GDPR) for the following purposes:

a)	to support pupil learning	In accordance with the legal basis of Public Task ; necessary to perform tasks that schools are required to perform as part of their statutory function and in terms of any special category data, with Article 9 of the GDPR.
b)	to monitor and report on pupil progress	
c)	to provide appropriate pastoral care	
d)	to assess the quality of our services	
e)	to keep pupils safe	In accordance with the legal basis of Vital interest ; to keep children safe i.e. food allergies, required medication, contact details, court orders etc.

f)	to meet the statutory duties placed upon us	In accordance with the legal basis of Legal Obligation; data collected for DfE census information. (see Department for Education in the section – Who we share our data with).
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Collecting pupil information

All of the data we collect comes either from you, the parents, or from another educational establishment that the pupil has been previously registered with.

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 at the point of collection and the reason for collection.

How long do we keep your information for?

In retaining personal information, the Academy Trust complies with the Retention Schedules provided by the Information Record Management Society or by the statutory body which overrides this guidance. For more information regarding our data retention schedule and how we keep your data safe please refer to our website.

Who might we share your information with?

We do not share information about our pupils or parents unless the law and our policies allow us to do so. We specifically do not pass on your details to third parties for marketing purposes.

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our local authority and the Department for Education (DfE) via secure data collection returns
- youth support services (pupils aged 13+)
- third party software applications necessary to the running of the school i.e. cashless catering software, attendance software, attainment tracking software etc.

A list of the third parties we regularly connect with, what we share and how they use the data is attached as Appendix 1 to this notice.

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/data-collection-and-censuses-for-schools>.

What do we do with your information?

All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected The Academy Trust monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

What are your rights with respect of your personal information?

Under data protection law, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or to have access to your child's educational record, contact the School Data Protection Officer at Warwickshire Legal Services via email at schooldpo@warwickshire.gov.uk or alternatively;

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL

****Please ensure you specify which school your request relates to.**

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 we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

If you have any queries about this Privacy notice, please contact GDPR@sponne.org.uk

Review

The content of this Privacy Notice will be reviewed annually or where substantial change is required due to a change in the law. The first review is scheduled for May 2019.

Information sharing with third parties

Department for Education

We are required to share information about our pupils with the Department for Education (DfE) either directly or via our local authority for the purpose of data collection, under:

- section 537A of the Education Act 1996
- the Education Act 1996 s29(3)
- the Education (School Performance Information)(England) Regulations 2007
- regulations 5 and 8 School Information (England) Regulations 2008
- the Education (Pupil Registration)(England)(Amendment) Regulations 2013

All data is transferred securely and held by DfE under a combination of software and hardware controls, which meet the current government security policy framework.

Youth Support Services 13+ (Local Authority)

Once our pupils reach the age of 13, we pass pupil information to our local authority and / or provider of youth support services as they have responsibilities in relation to the education and training of 13 -19 year olds under section 507B of the Education Act 1996.

This enables them to provide youth support services and careers advisors and for post 16 students, additional Post 16 training and education services.

The information shared is limited to the pupil's name, address and date of birth. However where a parent or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the pupil once he/she reaches the age of 16.

Data is securely transferred to the youth support service via a secure file transferring system and is stored within local authority software. Details of the privacy notice can be found here:

<http://www.prospects.co.uk/Home/Privacy-Policy>

All other third party contacts

The link to the Privacy Notices of these third parties details how they use the data they collect. They will also have an agreement with the school that they will comply with the GDPR regulations when using the data of our students. This list is not exhaustive.

Who	What	Why	Privacy Notice Link
Biostore Ltd	Name, student ID number, Dietary requirements & allergies, Biometric data from thumbprint	Admin of the Cashless Catering System	https://biostore.co.uk/site-use/gdpr-compliance/
Go 4 Schools	Name, Contacts, Timetable, Demographic information	Provide functionality of Go 4 Schools online Management Information System	http://www.go4schools.com/PrivacyPolicy.aspx
SIMS	Student Data, Contacts, Timetable, Session Attendance, Lesson Attendance,	Provide functionality of SIMS Management Information System	https://www.capita-sims.co.uk/privacy-notice

	Achievements, Behaviour, Assessment, Student Data (data collection), Contacts (data collection) Reports		
Learning Records Service	ULN, student names, exam results	Collation of student qualification record	https://www.gov.uk/government/publications/lrs-privacy-notice
Department for Education	Student record, attendance, achievement	School accountability, national statistics	
Cyclone Industries	Student Record, attendance	Record attendance for sixth form	http://www.cycloneindustries.co.uk/docs/Data%20Protection%20Policy.pdf