

## Privacy Notice - Pupils (How we use pupil information)

This privacy notice explains how we collect, store and use personal data about **pupils**.

Under data protection law, individuals have a right to be informed about how our schools/academies use 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.

**Inicio Academies is the Data Controller for the use of personal data in this privacy notice.**

### The categories of pupil information that we process includes, but is not restricted to:

- characteristics (such as ethnicity, language, and free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- special educational needs (including the needs and ranking)
- medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, trips attended, number of absences, absence reasons and any previous schools/academies attended)
- assessment and attainment (such as results of internal and external set tests/ examinations, courses enrolled for and any relevant results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- CCTV images captured (if applicable)
- Biometric information (only in applicable academies i.e. fingerprint identification system for school administration purposes such as cashless catering)
- Personal identifiers and contacts (such as name, photographs, unique pupil numbers, contact details, address and medical information) for the purpose of trips and visits

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

### Why we collect and use pupil information

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

- a) to support pupil learning
- b) to monitor and report on pupil attainment progress

- c) to provide appropriate pastoral care
- d) to assess the quality of our services
- e) to keep children safe (food allergies, or emergency contact details)
- f) to administer admission waiting lists
- g) to meet the statutory duties placed upon us for DfE data collections

## **Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing pupil information are:**

Most commonly, we process it:

- to comply with a legal obligation
- where personal data collected is essential for the schools/academies to fulfil their official functions and meet legal requirements.
- to perform an official task in the public interest

Less commonly, we may also process pupils' 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 pupils' 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 pupils' personal data overlap, and there may be several grounds which justify our use of this data.

## **Collecting pupil information**

We collect pupil information via:

- Registration or data collection forms
- Common Transfer Files (CTFs) or secure file transfer from previous school s/academies

Pupil data is essential for the school/academies' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this and we will tell you what you need to do if you do not want to share this information with us.

## **Storing pupil data**

We hold pupil data securely for the set amount of time shown in our data retention schedule. For more information on our Data Retention and Destruction Policy please visit: [www.inicioacademies.org.uk](http://www.inicioacademies.org.uk)

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

Where it is legally required or necessary we may routinely share pupil information with:

- Department for Education – we share pupil data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school/academy funding and educational attainment policy and monitoring.
- Local Authority – we are required to share information about our pupils' with our local authority (LA) to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
- Multi-Academy Trust – to allow the business to function, such as sharing information with HR and finance teams

- Our regulator [e.g. Ofsted] – to meet our legal obligations to share certain information during the inspection process
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Our auditors – to enable them to provide the service we have contracted them for
- Health authorities/NHS – to meet our legal obligations to share certain information with it, such as Education Health Care Plans
- Health and social welfare organisations – to meet our legal obligations to share certain information with it, such as child protection information
- Professional advisers and consultants – to enable them to provide the service we have contracted them for
- Police forces, courts, tribunals – to meet our legal obligations to share certain information with it, such as CCTV footage or contact information
- Other schools/academies that the pupils attend after leaving us
- Youth support services (pupils aged 13+)

## **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. Further examples of why we share pupil data are listed above under ‘who we share pupil information with’

## **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

The information shared is limited to the child’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 child / pupil once they reach the age 16.

Data is securely transferred to the youth support service via encrypted email and is stored on the school/academy system and held for until a student reaches age 25.

## **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

A child / pupil aged 16 or over can object to only their name, address and date of birth is passed to their local authority or provider of youth support services by informing us.

Data is securely transferred to the youth support service via encrypted email and is stored on the school/academy system and held for until a student reaches age 25.

For more information about services for young people, please visit our local authority website.

## Department for Education

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. 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 those data collections, such as census, under:

- regulation 5 of The Education (Information About Individual Pupils) (England) 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](#).

## 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. To make a request for your personal information, or be given access to your child's educational record, contact [SJones@inicioacademies.org.uk](mailto:SJones@inicioacademies.org.uk)

You also have the right to:

- to ask us for access to information about you that we hold
- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

If you have a concern or complaint 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/>.

For further information on how to request access to personal information held centrally by DfE, please see the 'How Government uses your data' section of this notice.

## Withdrawal of consent and the right to lodge a complaint (where consent is the only lawful basis to hold/process data)

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know in the first instance by contacting Mrs S Jones, Operations & Business Manager [SJones@inicioacademies.org.uk](mailto:SJones@inicioacademies.org.uk)

## **Last updated**

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated on **1<sup>st</sup> April 2024**.

## **Contact**

If you would like to discuss anything in this privacy notice, please contact: **Mrs S Jones, Operations & Business Manager** [SJones@inicioacademies.org.uk](mailto:SJones@inicioacademies.org.uk)