

Academies Trust

8th Floor, Angel Square,  
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# Privacy Notice

Pupils / Students and Families

This document will be reviewed annually and sooner when significant changes are made to the law.

## Contents

1. What this Privacy Notice is for	3
2. The types of information that we may process	3
4. Why we collect and use your information	5
4.1. Pupil information	5
4.2. Family information	5
4.3. Marketing purposes	6
4.4. Automated decision making & profiling	6
5. How we collect pupil and family information	6
6. How, where and for how long we store pupil and family information	7
7. Who we share pupil and family information with	7
8. International Transfers	8
9. Freedom of Information Act and Environmental Information Regulations 2004	8
10. Why we regularly share pupil information	9
10.1. Youth support services and Careers advisors	9
10.2. Department for Education	9
10.3. Local Authorities	10
11. Requesting access to your personal data, and other rights	10
12. How Government uses your information	11
12.1. Data collection requirements	11
12.2. The National Pupil Database (NPD)	11
12.3. Sharing by the Department	12
12.4. Learner Records Service	12
12.5. How to find out what personal information the DfE hold about you	12
13. Updates to this privacy notice	13
14. Contacts	13

# Privacy Notice - For pupils and their families

## 1. What this Privacy Notice is for

- 1.1. The Co-op Academies Trust (and all of our academies) collects, holds, uses and shares information about our pupils. This is known as “personal data” and you have rights around that data, including knowing how and why we are processing the data.
- 1.2. “Processing” data means anything that we do with it, such as collecting, storing, using, sharing and disposing of it.
- 1.3. For the purposes of Data Protection legislation the Co-op Academies Trust is a data controller and is registered as such with the Information Commissioner’s Office.

## 2. The types of information that we may process

- 2.1. We may process the following personal data relating to our pupils and their families:
  - Name of pupil, date of birth, unique pupil number, and contact details including your address
  - Details about your family (names of family members, names of other children, who to contact in an emergency, contact details, email addresses, national insurance numbers, etc)
  - Admission records (including any previous schools attended)
  - Attendance and absence records (sessions attended, number of absences, absence reasons)
  - Behavioural information (such as details as to how the pupil behaves, how we manage their behaviour, exclusions and any alternative provision put in place)
  - Academic progress and attainment
  - Examination details
  - Medical conditions we need to be aware of, including SEND, mental and physical health
  - Personal care records (toileting, changing needs, eating habits, food intake and sleep monitoring)
  - Safeguarding information including notifications from the police, court orders and/or social care involvement
  - For pupils enrolling for post 14 qualifications, the Learning Records Service will give us the unique learner number (ULN) and may also give us details about their learning or qualifications.
  - Information about plans for career or post 16 education choices including destination data (where they ultimately go to after leaving school, for example, college, university, apprenticeship, employment etc).

- Post 16 learning information
- Extra-curricular and enrichment participation, including details about trips and visits, and relevant consents.
- Information about supporting their learning
- Closed circuit television (CCTV) data
- Photographs
- Records of communications such as emails, phone messages, letters and complaints.
- Records of visits made by family members to the school, such as the date and time of the visit, and who was visited.
- Files, messages, documents and artwork the pupil has produced
- Records of discussions with members of staff
- Information about consultation with other professionals
- Records of any academy equipment loaned to the pupil
- The pupil's use of Trust and academy devices and academy networks as part of our safeguarding procedures
- Banking details for the parent/carer (a credit or debit card registered with our payment system)
- Records of transactions in our payment system
- Information about the parent/carer's employment, social and financial situation
- Information about any care or contact orders relating to the pupil.

### 3. Special category data (Sensitive information)

3.1. Some data is particularly sensitive and we are required to be especially careful about how we process it. This is called 'special category' data. In relation to our pupils and their families we hold the following special category data:

- Characteristics (including ethnicity and language)
- Safeguarding information (such as court orders and professional involvement)
- Special educational needs
- Medical information that we need to be aware of (including your doctor's information, child health, dental health, allergies, medication and dietary requirements)
- Free school meal eligibility
- Other funding information (e.g. Pupil Premium, High Needs Funding and Catch Up Funding)

3.2. Some of our academies (not all) process Biometric data in order to identify pupils, such as their thumb print for catering services / access to systems – more information about this can be found in our Biometrics Policy.

## 4. Why we collect and use your information

### 4.1. Pupil information

We collect and use your information:

- To support the admissions process
- To support learning
- To monitor and report on academic progress
- To enable pupils to participate in exams
- To provide appropriate pastoral care
- To help us manage any health conditions that may affect their learning
- To comply with our legal obligations to share information
- To assess the quality of our services
- To keep children safe
- To meet the legal duties placed upon us by the Department for Education
- To comply with the law in general
- For site safety and security
- To protect against fraud
- To streamline systems
- For evaluation/research purpose

Photos of pupils are used for identification purposes (safeguarding), and celebration purposes (to record work, classes and academy events)

### 4.2. Family information

We collect and use information about our pupils' families:

To support the admissions process

- To support the pupil's learning.
- To ensure we receive the correct funding for pupils that attend our nurseries
- To maintain a safe environment for our pupils, staff, parents, carers and families
- For safeguarding and welfare purposes
- To provide appropriate pastoral care
- To process payments
- To enable free school meals to be provided
- To fulfil our legal obligations
- For communication and reporting purposes
- To keep families informed about events and emergencies
- To process payments
- To gather feedback about our work

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

- Article 6(a) – Consent (for anything which does not fall into the purposes explained below)
- Article 6(c) - Compliance with our legal obligations as set out in the Education Act 1996 (as amended). We are required to share information about our pupils with the (DfE) under regulation 3 of The Education (Information About Individual Pupils) (England) Regulations 2013. In addition, there are extensive statutory obligations that a school is subject to – further details about these are available from our Data Protection Officer.
- Article 6(e) - Being necessary for us to carry out tasks that are in the Public Interest

The ways we collect and use sensitive pupil and family information are lawful based on:

- Explicit consent
- For compliance with certain legal obligations
- For exercising certain legal rights
- For protecting a person’s vital interests in an emergency
- For health and public health reasons
- For carrying out tasks that are in the substantial public interest including for safeguarding purposes.

Please see our Special Category Data Policy for full details of these lawful bases for processing this data.

#### 4.3. Marketing purposes

Where a family member gives us consent, we may send them marketing information by text message or email, such as for promoting school events, campaigns or charities. Consent can be withdrawn at any time by contacting us (see the Contacts section).

#### 4.4. Automated decision making & profiling

We don’t use any personal information to make automated decisions about our pupils or their families, or to profile them. If this changes in the future, privacy notices will be updated to explain both the processing and any right to object to it.

### 5. How we collect pupil and family information

- 5.1. We collect pupil information using:
  - Admission forms completed by parent/carer when a pupil joins one of our academies
  - Data collection forms
  - CCTV cameras

- Information produced from our day-to-day interaction with pupils
- Other information provided by:
  - parents/carers
  - the previous school/provision
  - local authorities
  - NHS
  - Police
  - The Department for Education (DfE)
  - By secure file transfer Common Transfer File (CTF).

5.2. We sometimes audio/ video record sessions/lessons/assessments for pupil or staff development and assessment. This will generate personal data including pupil images, names, contributions, and will be protected, processed, and retained in the same way as all personal data, in line with the Trust's Data Protection Policies.

5.3. Whilst most of the pupil information provided to us is mandatory, some of it is requested on a voluntary basis. We will let pupils and families know, when we ask for information, whether they are required to provide the information and their rights in relation to this.

## 6. How, where and for how long we store pupil and family information

6.1. Some of the personal data that we collect, and use, is stored in the Trust's Google Workspace. Google Workspace is a cloud-based platform with personal data being held on Google servers.

6.2. Other data, depending on its purpose will be kept in other systems (see below) or in manual files.

6.3. Secure storage is provided for paper based records.

6.4. We also use email to enable authorised users to transfer information to one another.

6.5. We only keep the information for the length of time we need it for, as shown in our data retention schedule. For more information on our data retention schedule, please visit our data retention policy here: <https://www.coopacademies.co.uk/page/?title=GDPR+and+Data+Protection&pid=44>

6.6. We dispose of personal information securely when we no longer need it.

## 7. Who we share pupil and family information with

We routinely share information with:

- Family, associates and representatives of the person whose personal data we are processing, who are authorised to receive the data
- Other schools (former school (feeder schools) or schools the pupil attends after leaving us).
- The Local Authority (for the relevant academy)
- Our Trust Board, members of our Academy Community Councils and our Resolutions Panel members.
- Youth support services/careers services
- Universities
- Employers/training providers where references are requested
- Work experience providers
- The Department for Education (DfE) Inc. Learner Record Services, the National Pupil Database and the Teaching Regulation Agency
- Examining bodies
- Police and Courts
- NHS (agencies and services) including the school nurse, healthcare, social and welfare organisations.
- Voluntary and charitable organisations
- Press and the media
- Research Institutions/Evaluators
- External systems used by the Trust and our academies to carry out day to day processes and requirements. For example, and not limited to:
  - Arbor - our MIS system
  - CPOMs - our safeguarding system
  - Google Workspace and Google Classrooms
  - School Photographer
  - Social media platforms such as Twitter and Facebook

## 8. International Transfers

Personal information may be transferred outside the UK and the European Economic Area ('EEA'), including to the United States. Where information is transferred outside the UK or EEA to a country that is not designated as "adequate" in relation to data protection law, the information is adequately protected by the use of International Data Transfer Agreements and security measures, and other appropriate safeguards. For more information on international transfers please contact us at the details below.

## 9. Freedom of Information Act and Environmental Information Regulations 2004

As a public body, our Trust is subject to requests made under the above legislation. However, we will never disclose personal data in our responses to these requests where to do so would contravene the principles of data protection.



## 10. Why we regularly share pupil information

We do not share information about our pupils or families with anyone without consent unless the law and our policies allow us to do so.

### 10.1. Youth support services and Careers advisors

Once our pupils reach the age of 13, we pass information about the pupil to our local authority so they can carry out their legal 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 object to any information in addition to their child's name, address and date of birth being passed to their local authority or provider of youth support services by informing us. This right is transferred to the child / pupil once they reach the age of 16

Data is securely transferred to the youth support service under the terms of a Data Sharing Agreement with the relevant local authority.

We will also share certain information about pupils aged 16+ with the relevant local authority 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 once they reach the age of 16 can object to information other than their name, address and date of birth being passed to their local authority by contacting us.

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

### 10.2. 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.

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.

### 10.3. Local Authorities

We may be required to share information about our pupils with the local authority to ensure that they can conduct their statutory duties under the Schools Admission Code, including conducting Fair Access Panels.

All of our secondary academies collect information on intended destinations (where a student goes and what he/she does after leaving school), and pass it on to their local authorities, so that the local authorities can fulfil their requirement to ensure students have an education or training placement for the September after they finish key stage 4. This is recorded on the National Client Caseload Information System (NCCIS) for the Department for Education and for local authorities. Schools with sixth forms, colleges and training providers should then confirm actual destinations (i.e. enrolments) with local authorities for all 16 and 17 year olds, and local authorities should send this data to the Department. (Destination Daa: Good practice guide for schools , 2018)

## 11. Requesting access to your personal data, and other rights

- 11.1. Under data protection law, pupils have the right to request access to information about them that we hold, and in some cases, parents can make the request on the pupil's behalf, although this will be subject to the pupil's consent if they are deemed to be competent to understand the request and any implications. We usually say that pupils aged 12 and over are competent to understand, unless we have evidence to the contrary.
- 11.2. Parents of pupils who attend one of our special schools, also have the right to access their child's educational record.
- 11.3. Family members/carers also have the right to request access to information about them that we hold.
- 11.4. Pupils and their families also have the right to:
  - be informed about the collection and use of their personal data.
  - have inaccurate personal data changed, or completed if it is incomplete.
  - have their data erased, often known as the 'right to be forgotten'; however this does not apply where, amongst other things, processing is necessary to comply with a legal obligation.
  - restrict the way we are using their information, although, as above this is a limited right.
  - object to the way we are using their information; though other than for marketing purposes, this is also limited as above.

- 11.5. Where we rely on your consent to collect and use personal data, 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 – our contacts are at the end of this document.
- 11.6. Pupils and their families also have rights in relation to automated decision making and profiling, though these are not currently relevant as we don't carry out automated decision making or profiling.
- 11.7. Finally, pupils and their families have the right to complain about the way we use their personal information to the ICO, or to seek compensation through the courts
- 11.8. If you would like to request access to your data, or use any of the other rights listed above, please contact the relevant academy office in the first instance.

## 12. How Government uses your information

[Privacy information: parents and legal guardians - GOV.UK \(www.gov.uk\)](https://www.gov.uk/privacy-information-parents-and-legal-guardians)

The pupil data that we lawfully share with the DfE through data collections:

- underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- informs 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).
- supports 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

### 12.1. 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>

### 12.2. The National Pupil Database (NPD)

Much of the data about pupils in England goes on to be held in 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.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

### 12.3. Sharing by the Department

The law allows the Department to share pupils' personal data with certain third parties, including:

- schools
- local authorities
- researchers
- organisations connected with promoting the education or wellbeing of children in England
- other government departments and agencies
- organisations fighting or identifying crime

For more information about the Department's NPD data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

Organisations fighting or identifying crime may use their legal powers to contact the DfE to request access to individual level information relevant to detecting that crime. Whilst numbers fluctuate slightly over time, the DfE typically supplies data on around 600 pupils per year to the Home Office and roughly 1 per year to the Police.

For information about which organisations the Department has provided pupil information to, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the Police please visit the following website:

<https://www.gov.uk/government/publications/dfе-external-data-shares>

### 12.4. Learner Records Service

The Learning Records Service does not process data about our primary pupils. However, for all other pupils, the information you supply is used by the Learning Records Service (LRS). The LRS issues Unique Learner Numbers (ULN) and creates Personal Learning records across England, Wales and Northern Ireland, and is operated by the Education and Skills Funding Agency, an executive agency of the Department for Education (DfE). For more information about how your information is processed, and to access your Personal Learning

Record, please refer to:

<https://www.gov.uk/government/publications/lrs-privacy-notice>

## 12.5. [How to find out what personal information the DfE hold about you](#)

Under the terms of the Data Protection Act 2018, you are entitled to ask the Department:

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below: <https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

To contact the DfE please visit: <https://www.gov.uk/contact-dfe>

## 13. [Updates to this privacy notice](#)

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was approved in September 2024.

## 14. [Contacts](#)

If you have a concern about the way we are collecting or using your personal data or you would like to discuss anything in this privacy notice, we ask that you raise your concern with us in the first instance.

Please contact the relevant academy where the pupil attends and ask to speak with the Headteacher or the academy's Data Protection Ambassador.

You may also contact the Trust's Head of Data Protection on the details below:

Tammy Pyszky [data@coopacademies.co.uk](mailto:data@coopacademies.co.uk) 07815654419

If you are dissatisfied with our response to your concerns you can contact the ICO (contact details below) quoting our ICO registration number ZA201403 and stating that the Data Controller is The Co-op Academies Trust.

Information Commissioners' Office  
Wycliffe House  
Water Lane  
Wilmslow

Cheshire  
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

Website: <https://ico.org.uk/concerns/>