



Inspiring Primaries Academy Trust
Inspiring pupils to achieve for their tomorrows

CHURCH LANE – GILMORTON – LUTTERWORTH – LEICESTERSHIRE - LE17 5LU – TELEPHONE: 01455 552 343

Privacy Notice for Parents and Pupils – How we use your information 2020/2021

Who are we?

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

Inspiring Primaries Academy Trust is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: ZA291758.

You can contact the Academy Trust as the Data Controller in writing at:
Inspiring Primaries Academy Trust, Church Lane, Gilmorton, Lutterworth, Leicestershire, LE17 5LU or enquiries@inspiringprimaries.uk.

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 is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information relates to personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

RESPECT - PERSEVERANCE - COMMUNITY

Our vision is to develop flourishing, lifelong learners in partnership with the communities we serve.

Inspiring Primaries Academy Trust: a company limited by guarantee, registered in England and Wales, number 08540699.

An exempt charity. Registered Office: Church Lane, Gilmorton, Leicestershire

What personal information do we process about pupils and parents?

Personal data that we may collect, use, store and share (when appropriate) about pupils includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Characteristics, such as ethnic background, eligibility for free school meals, or special educational needs
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs
- CCTV images captured in school

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

Why do we use personal information?

We use this data to:

- Support pupil learning
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Protect pupil welfare
- Assess the quality of our services
- Administer admissions waiting lists
- Carry out research
- Comply with the law regarding data sharing

Collecting pupil information

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.

What are the legal reasons for us to process your personal information?

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. The lawful reasons we have for processing personal information are as follows:

1) To comply with the law

We collect and use general purpose pupil information in order to meet certain legal requirements and legal obligations placed upon the Academy Trust by law. We therefore are required to process personal information for such purposes even if you have not consented to us doing so.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

If you would like a copy of or further information regarding the statutory authorities that underpin our legal obligations, you should contact the Academy Trust in writing.

2) To protect someone's vital interests

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

3) With the consent of the individual to whom that information 'belongs'

Whilst much of the personal information processed is in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

4) To perform a public task

It is a day-to-day function of the Academy Trust to ensure that children receive the education and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that pupils are properly educated and supported.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

5) We have a legitimate interest

Occasionally we have reasons to process information which fall outside of our usual day-to-day school functions. Details of the type of processing that we may undertake on this basis are set out in Table 5.

Please be aware that an individual has the right to object to any processing where it is likely to cause or is causing harm or distress. To exercise this right, individuals should do so by contacting the school/academy trust to inform them of their reasons for the objection. These reasons should relate to your specific circumstances. Upon receipt of an objection, the academy trust will consider the reasons for the objection and balance this against the legitimate grounds to process data.

Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

1. Explicit consent of the data subject
2. Processing relates to personal data which is manifestly made public by the data subject
3. Necessary for establishing, exercising or defending legal claims
4. Necessary for reasons of substantial public interest
5. Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
6. Necessary for archiving, historical research or statistical purposes in the public interest

The lawful reasons for each type of special category personal information data that we process is set out in the tables attached.

Who might we share your information with?

We routinely share pupil information with:

- Schools that the pupils attend after leaving us
- Our local authority
- Central and local governments
- The Department for Education (DfE)
- The pupil's family and representatives
- Our regulator Ofsted
- Our auditors
- NHS, Public Health and other public health agencies
- Police forces, courts, tribunals
- Professional advisors and consultants
- Survey and research organisations
- Information Management software: Arbor
- Educational apps: Times Tables Rockstars, Studybugs, Mathletics,
- Education platforms for homework and home learning: Google Classroom

We do not share information about our pupils or parents unless the law and our policies allow us to do so.

Please refer to the tables for information about what personal information is shared with which specific third parties.

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).

NHS Test and Trace/Public Health Agencies:

It may be necessary for us to share limited information with the above agencies in the event that an individual tests positive for Coronavirus, or if there is a Coronavirus outbreak. This will enable the named agencies to liaise with families to provide advice and support, and to take appropriate steps in responding to an outbreak.

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. The schedules set out the Statutory Provisions under which the Academy Trust is required to retain the information.

A copy of those schedules can be located using the following link:

<http://irms.org.uk/page/SchoolsToolkit>

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 contact or 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.**

Where the school/academy trust process data for the purposes of legitimate interests or to fulfil their public task, individuals have a right to object to the processing where it is likely to cause, or is causing, harm or distress. When exercising this right, individuals should contact the school/academy trust to inform them of their reasons for their objection. The school/academy trust will consider the reasons for any objection and assess the risk to the individual against the purposes for the processing. In the event the school/academy trust is unable to comply with an objection, we will ensure we can demonstrate compelling legitimate grounds to continue with the processing.

You also have the right to:

- 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:

- online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Review

The content of this Privacy Notice will be reviewed 1st May 2022.

Table 1 - Personal information we are required to process to comply with the law:

Information Type	Relevant legislation	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Pupil full name	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform ParentPay - online payment system Cool Milk Tapestry - Assessment and tracking tool for Reception class Google Workplace for Education - Online learning platform TTRockstars - Online Times tables App (https://trockstars.com/) EdShed - Online Maths and English Platform (https://www.edshed.com/en-gb/) 	To perform a public task
Gender	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform Tapestry - Assessment and tracking tool for Reception class 	To perform a public task
Date of Birth	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform Tapestry - Assessment and tracking tool for Reception class 	To perform a public task
Home Address	The Education (Information about	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation

	Individual Pupils) (England) Regulations 2013 Regulation 3(2)		<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform 	To perform a public task
First Language	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System 	To perform a public task
Ethnicity	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System 	To perform a public task
National Identity, Country of Birth, Nationality	Education Act 1996 Section 537A	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System 	To perform a public task
Date of Admission to school	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System 	To perform a public task
Last school attended - name and address	The Education (Information about Individual Pupils) (England) Regulations	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System 	To perform a public task

	2013 Regulation 3(2)			
National Curriculum Year Group	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform ParentPay - online payment system Cool Milk Tapestry - Assessment and tracking tool for Reception class Google Workplace for Education - Online learning platform TTRockstars - Online Times tables App (https://ttrackstars.com/) EdShed - Online Maths and English Platform (https://www.edshed.com/en-gb/) 	To perform a public task
Unique Pupil Number (UPN)	Education Act 1996 Section 537A	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform 	To perform a public task
Eligibility for Free School Meals	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform Tapestry - Assessment and tracking tool for Reception class 	To perform a public task
Mode of Travel to School	Education Act 1996 Section 508A	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation
Proficiency in English	Education Act 1996 Section 537A	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management 	To perform a

			Information System	public task
Whether a pupil is Looked After and the name of relevant Local Authority	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform 	To perform a public task
Where a pupil is no longer Looked After, the type of order that brought this about.	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform 	To perform a public task
Special Educational Needs status, start date, details of needs and provision	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform 	To perform a public task
Details of Exclusions: start and end dates, number of sessions, fixed length/permanent, reason for exclusion	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform 	To perform a public task
Assessment Date - End of Key Stage, Year 1 Phonics Check and Year 4 Multiplication Check	The Education (Pupil Information) (England) Regulations 2005	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System 	To perform a public task

Pupil Annual Reports	The Education (Pupil Information) (England) Regulations 2005	n/a	<ul style="list-style-type: none"> School to which pupil has transferred. 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Google Workplace for Education 	To perform a public task
Attendance records including whether absence was authorised/unauthorised and reason for absence	The Education (Information about Individual Pupils) (England) Regulations 2013 Regulation 3(2)	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. Educational Welfare Officer 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System Safeguard - online safeguarding platform 	To perform a public task
Parent's / Carer's names	The Education (Pupil Information) (England) Regulations 2006 Regulation 5 (1)(c)	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. Educational Welfare Officer 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System 	To perform a public task
Parent's / Carer's contact details	The Education (Pupil Information) (England) Regulations 2006 Regulation 5 (1)(c)	n/a	<ul style="list-style-type: none"> Local Authority Department of Education School to which pupil has transferred. Educational Welfare Officer 	Legal obligation
			<ul style="list-style-type: none"> Arbor - Management Information System 	To perform a public task
Pupil Assessment Data (Curricular Record)	The Education (Pupil Information) (England) Regulations 2005, Regulation 4		<ul style="list-style-type: none"> Arbor - Management Information System 	To perform a public task

Table 2 – Personal information we are required to process as it is necessary to protect someone’s vital interests

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Medical Information	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent.	<ul style="list-style-type: none"> • Medical staff i.e. paramedics/ambulance 	Vital Interest
Medical Information and conditions	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent.	<ul style="list-style-type: none"> • External third parties such as coaches and volunteers supporting curricular or extracurricular activities 	Vital Interest
Dietary / allergies	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent.	<ul style="list-style-type: none"> • Medical staff i.e. paramedics/ambulance • Catering Staff - Educaterers • Residential Accommodation providers - e.g. PGL Location visited where food will be provided by third parties • other schools and locations visited on school trips 	Vital Interest
Religious belief	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent.	<ul style="list-style-type: none"> • Medical staff i.e. paramedics/ambulance 	Vital Interest

Table 3 - Personal information we are required to process with the consent of the individual to whom that information ‘belongs’

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Digital Photographs / videos		<ul style="list-style-type: none"> • Media organisations to take photographs of pupils (including your child) engaged in school activities or events for publication • School Newsletter • School Prospectus • School Website • Facebook and Twitter • Official school photographs, with images taken by an external Photographic company and available for purchase by parents 	Consent

Table 4 - Personal information we are required to process because it is necessary to do so in order to perform a public task - please note that the right to object will apply to this processing, please see the section above that refers to ‘What are your rights with respect to your personal information?’

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Year Group		<ul style="list-style-type: none"> Public Health and other public health agencies 	Public task
Results of COVID 19 testing	Necessary for reasons of public health	<ul style="list-style-type: none"> Public Health and other public health agencies 	Public task
Pupil Information i.e. name, age, address, parent / carer details, emergency contact details		<ul style="list-style-type: none"> Department of Education - school census. Other schools - when pupils transfers Public Health and other public health agencies 	Public Task & Legal Obligation
Academic Progress data including Pupil Reports, Assessment records, learning journals, staff observations		<ul style="list-style-type: none"> OFSTED Parents Health Services such as Speech and Language 	Public Task & Legal Obligation
Safeguarding information, Medical, Special Education Needs		<ul style="list-style-type: none"> Local Authority Health Parents Other schools on pupil transfer 	Legal Obligation
Pupil Premium / FSM		<ul style="list-style-type: none"> Department of Education - school census. Other schools - when pupils transfers 	Public Task
Adopted children / LAC status		<ul style="list-style-type: none"> Department of Education - school census. Other schools - when pupils transfers 	Public Task
Service Children		<ul style="list-style-type: none"> Department of Education - school census. Other schools - when pupils transfers 	Public Task
Court Orders		<ul style="list-style-type: none"> Other schools - when pupils transfers 	Public Task
The pupil is considered a young carer		<ul style="list-style-type: none"> Other schools - when pupils transfers 	Public Task
Attendance records		<ul style="list-style-type: none"> Local Authority Other schools - when pupils transfers 	Public Task

Table 5 - Personal information we process because we have a legitimate interest

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Images captured on a schools' CCTV system	n/a	<ul style="list-style-type: none"> • Police and legal system where a suspected crime has been committed 	Legal obligation