



Students and Parents

This privacy notice is intended to provide information about how your school and Sherborne Area Schools' Trust (SAST) will use (or process) personal data about current, past and prospective students, and their parents or guardians (referred to in this notice as parents).

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Responsibility for data protection

- SAST is the 'data controller' for the purposes of data protection law.
- The Data Protection Officer (DPO) is Moira Lyons-Montgomery who can be emailed at dpo@sast.org.uk.
- The data protection lead in each SAST school is the headteacher.
- The DPO will deal with requests and enquiries concerning the Trust's uses of personal data.
- The DPO and headteacher will endeavour to ensure that all personal data is used carefully and lawfully.

How we use your personal data

Your school needs to use data on students in order to be able to keep you safe and deliver the best education possible. Only essential data is held, and we always follow the law when we collect use, store, and share your data.

You have a legal right to be informed about how our Trust uses any personal information that we hold about you. This privacy notice explains how we collect, store, and use personal data about you.

The personal data we hold about students

We hold some personal information about you to make sure we can help you learn and look after you when you attend a school in our Trust.

For the same reasons, we get information about you from some other places too – like other schools, the local council, health and social care agencies and the government.

This information includes but is not limited to:

- your contact details
- assessment of your work
- your attendance records
- your characteristics, like your ethnic background or any special educational needs
- any medical conditions you have
- information about dietary requirements
- details of any behaviour issues or exclusions
- photographs or recordings
- details of where you go when you leave us at 16, which new school you may move to
- CCTV images
- biometric data (from your thumbprint) if your school uses thumbprint entry for the library or cafeteria and only where consent has been given

The personal data we hold about parents

We hold some personal information about parents and your emergency contacts to make sure we can help students learn and look after you at school.

- first name, surname
- title
- contact details
- payment details (for nursery fees)
- payment details (if using a payment system where the data is stored in school and not with the payment company)
- we may also hold some information about parents or family if students have a safeguarding folder

Why we use this data

We use this data to help run the school and Trust including to:

- get in touch with you and your parents when we need to
- check how you're doing in all subjects and work out whether you or your teachers need any extra help
- provide remote learning opportunities
- track how well your school is performing
- look after your wellbeing
- refer to CCTV data as part of behaviour, disciplinary or grievance processes
- provide you with access to curriculum tools
- provide you with career and work experience opportunities

Our legal basis for using this data

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

- we need to comply with the law (*Article 6(1)(c) of UK GDPR*)

- we need to use it to carry out a task in the public interest (in order to provide you with an education) (*Article 6(1)(e) of UK GDPR*)

Sometimes, we may also use your personal information where:

- you, or your parents have given us permission to use it in a certain way (*Article 6(1)(a) of UK GDPR*)
- we need to protect your interests (or someone else's interest) e.g., in a life-or-death situation (*Article 6(1)(d) of UK GDPR*)

We may also collect and use information about your health or other protected characteristics such as your religion or ethnicity. These are special categories of personal information, and we will only collect and use these when it is essential. The legal basis here is *Article 9(2)(i) of UK GDPR*.

Public Health England also has special permission from the Secretary of State for Health and Social Care to use personally identifiable information without your permission where this is in the public interest. This is known as 'Section 251' approval and includes the use of the information collected by the NHS to help protect the public in a health emergency. The part of the law that applies here is Section 251 of the National Health Service Act 2006 and the associated Health Service (Control of Patient Information) Regulations 2002.

Where we have got permission to use your data, you or your parents may withdraw this at any time. We will make this clear when we ask for permission and explain how to go about withdrawing consent.

Some of the reasons listed above for collecting and using your information overlap, and there may be several grounds which mean we can use your data.

Collecting this information

While in most cases you, or your parents, must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data. We will always tell you if it's optional. If you must provide the data, we will explain what might happen if you don't.

We collect pupil information from school admission and consent forms, from local authorities, from previous schools you have attended.

Data sharing

We do not share personal information about you with anyone outside the school or SAST without permission from you or your parents, unless the law and our policies allow us to do so.

Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you with:

Who we share with	Why we share
Our local authorities - Dorset or Somerset Council	To meet our legal duties to share certain information with it, such as concerns about pupils' safety and exclusions.
The Department for Education	We have to do this by law. This data sharing underpins school funding, educational policy and funding. We also share daily attendance data which is used to identify attendance trends. See here for the DfE's privacy notice regarding daily attendance data: DfE privacy notice for schools daily attendance data collection (publishing.service.gov.uk)

Your family and representatives	To ensure that they know how you are doing and to protect your welfare.
Other schools you move to	We will transfer your pupil record, which consists of basic information, assessment data, any educational support, and any safeguarding records. We may share some information in advance if it will enable your next school to provide effective and timely support.
Police, courts, tribunals and security services	As we are required to by law.
Educators and examining bodies	To ensure that you are entered for exams and your results are recorded.
Health and social welfare organisations	Such as the school nurse and the Education Welfare Officer to help look after your health and wellbeing.
Our payment service providers: ParentPay, Wisepay, School Money	So that you can pay for meals, contribute to trips or resources and activities.
Providers of electronic curriculum resources, learning and tools	To allow you to use their resources in class and at home to support your learning and teacher assessment.
Google Classroom	A suite of online tools that can be used by the school. The tools include a class 'blog', the ability for the school to set tasks for learners and provide feedback. It has online software including Google versions of Word, PowerPoint and Excel.

Youth support services – for secondary schools

Once you reach the age of 13, the law (section 507B of the Education Act 1996) requires us to pass on certain information about you to either Dorset or Somerset Council's youth support services, as they have legal responsibilities regarding the education or training of 13-19 year olds.

This information enables the councils to provide youth support services, post-16 education and training services, and careers advisers.

Your parents, or you - once you are 16, can contact our data protection officer to ask us to only pass your name, address and date of birth to council's youth support services.

International transfers of personal data

We have recorded where we store all the personal data processed in your school and by third party services. If a third-party service stores data in the US, we have ensured that safeguards such as standard contractual clauses are in place to allow the safe flow of data to and from the school.

How we store this data

We will keep personal information about you while you are a student at a school in SAST. We may also keep it after you have left the Trust, where we are required to by law. If you leave us mid-year or move to a new school outside of SAST, we will transfer your pupil record to your new school.

Our record retention schedule/records management policy is based on the Information and Records Management Society's toolkit for schools and sets out how long we keep information about pupils. In 2015 a legal hold on the destruction of all UK pupil and personnel records was enforced during an inquiry into child

abuse. Although the inquiry has concluded and reported, follow-on guidance has not yet been provided to school.

Your rights and how to access personal information we hold about you

You can find out if we hold any personal information about you, and how we use it, by making a 'subject access request'. Your parents may make this request on your behalf. If we think you are able to understand your rights and what they mean, we may ask your permission before providing information to your parents.

If we do hold information about you, we will:

- give you a description of it
- tell you why we are holding and using it, and how long we will keep it for
- explain where we got it from, if not from you or your parents
- tell you who it has been, or will be, shared with

Your other rights over your data

Individuals also have the right, in certain circumstances, to:

- have your personal data rectified, if it is inaccurate or incomplete
- request the deletion or removal of personal data where there is no compelling reason for its continued processing. There are limitations and exceptions to this right which may entitle SAST to refuse requests
- restrict processing of personal data where there is no compelling reason for its continued processing
- stop it being used to send you marketing information (including profiling)
- to object processing for the purposes of scientific/historical research and statistics
- say that you don't want it used to make automated decisions (decisions made by a computer or machine, rather than by a person)
- have your data transferred to another organisation
- object to the processing of their personal data.
- stop photos or recordings of you being used on our websites or on the school's or Trust's social media accounts

If an individual wants to exercise any of these rights then they should contact dpo@sast.org.uk. The law does not oblige the Trust to comply with all requests. If the Trust does not intend to comply with the request then the individual will be notified of the reasons why in writing.

Complaints

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we've done something wrong by contacting our data protection officer, dpo@sast.org.uk

You can also complain to the Information Commissioner's Office in one of the following ways:

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

The Department for Education (DfE)

The DfE collects personal data from schools via pupil statutory data collections. The law requires us to share information about students with the DfE either directly or via our local authority for the purpose of those data collections, under:

- regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013 for school census returns.
- regulation 4 of The Education (Information About Individual Pupils) (England) Regulations 2013 if you attend Harbour Vale School.

The data is transferred securely to a DfE portal.

How Government uses your data

The pupil data that we lawfully share with the Department for Education (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)

Data collection requirements

To find out more about the data collection requirements placed on us by the DfE, for example; via the school census go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

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 DfE 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 DfE.

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-npd-privacy-notice/national-pupil-database-npd-privacy-notice>

Sharing by the DfE

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

- schools and 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 DfE 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 Department for Education (DfE) to request access to individual level information relevant to detecting that crime.

For information about which organisations the DfE has provided pupil information, (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/dfe-external-data-shares>

How to find out what personal information the DfE holds about you

Under the terms of the [Data Protection Act 2018](#), you are entitled to ask the DfE:

- 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 for Education (DfE), you should make a 'subject access request'. Further information on how to do this can be found within the Department for Education's (DfE) 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 Department for Education (DfE): <https://www.gov.uk/contact-dfe>