Privacy Notice for parents and carers
use of your child's personal data
(compliant with UK GDPR)

Introduction

Under UK data protection law, individuals have a right to be informed about how we 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.

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

This privacy notice applies while we believe your child is not capable of understanding and exercising their own data protection rights.

Once your child is able to understand their rights over their own data (generally considered to be age 12, but this has to be considered on a case-by-case basis), we will need to obtain consent from your child for you to make these requests on their behalf.

Venn is the 'data controller' for the purposes of UK data protection law.

Our data protection officer is Helen Turner (see 'Contact us' below).

The personal we hold

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
- Exclusion information
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Information about their use of our IT systems equipment and facilities (e.g. school computers).

We may also collect, use, store and share (when appropriate) information about your child that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Information about any medical conditions we need to be aware of, including physical and mental health
- Photographs and CCTV images captured in school
- Information about characteristics, such as ethnic background or special educational needs.

We may also hold data about pupils that we have received from other organisations, including other schools or trusts, and social service.

Why we use this data

We use the data listed above 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
- Make sure our IT systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely.

Use of your child's personal data for marketing purposes
Where you have given us consent to do so, we may send your child marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to them.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

Use of your child's personal data in automated decision making and profiling
We do not currently process any pupils' personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

Use of your child's personal data for filtering and monitoring purposes
While your child is in our school, we may monitor their use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:
- Comply with health and safety and other legal obligations
- Comply with our policies and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s).

Our lawful basis for using this data
Any personal data we process is done in accordance with Article 6 and Article 9 of the UK GDPR.

Our lawful basis for processing your personal information for reasons listed above are:
- Public task in line with Article 6(1)(e)
- Legal obligation in line with Article 6(1)(c)
- Consent in line with Article 6(1)(a) and explicit consent Article 9(2)(a)
- Vital interests in line with Article 6(1)(d) and Article 9(2)(c)
- Legitimate interests in line with Article 6(1)(f)
- Substantial public interest in line with Article 9(2)(g).

Where you have provided us with consent to use your child's data, you may withdraw this consent at any time. We will make this clear when requesting your 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 this data
While the majority of information we collect about your child is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about your child will come from you, but we may also hold data about your child from:

- Local authorities
- Government departments or agencies
- Police forces, courts or tribunals.

How we store this data

We keep personal information about your child while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary. Our data retention schedule is available from the school office on request, and sets out how long we keep information about pupils.

We have put in place appropriate security measures to prevent your child's personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your child's personal data securely when we no longer need it.

Who we share data with

We do not share information about your child with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with UK data protection law) we may share personal information about pupils with:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
- Government departments or agencies
- Our youth support services provider
- Our regulator, Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Financial organisations
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

National Pupil Database

We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school census and possibly the early years census.

Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the Department for Education and provides evidence on school performance to inform research.

The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The Department for Education may share information from the NPD with third parties, such as organisations which promote children's education or wellbeing in England. These third parties must agree to strict terms and conditions about how they will use the data.

For more information, see the Department for Education's webpage on how it collects and shares research data.

You can also contact the Department for Education with any further questions about the NPD.

Transferring data internationally
We may share personal information about you where different data protection legislation applies.

Where we transfer personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

Your rights
How to access personal information that we hold about your child
You have a right to make a 'subject access request' to gain access to personal information that the school holds about your child.

If you make a subject access request, and if we do hold information about your child, we will (subject to any exemptions that apply):
- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form.

You may also have the right for your child's personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request please contact us (see 'contact us' below).

Once your child is able to understand their rights over their own data (generally considered to be age 12, but this has to be considered on a case-by-case basis), we will need to obtain consent from your child for you to make a subject access request on their behalf.

Your other rights regarding your child's data
Under UK data protection law, individuals have certain rights regarding how your child's data is used and kept safe, including the right to:
- Object to the use of your child's personal data
- Prevent your child's data being used to send direct marketing
- Object to and challenge the use of your child's data for decisions being taken by automated means (by a computer or machine, rather than by a person)

- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your child's personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations.

To exercise any of these rights, please contact us (see 'Contact us' below).

Once your child is able to understand their rights over their own data (generally considered to be age 12, but this has to be considered on a case-by-case basis), we will need to obtain consent from your child for you to make these requests on their behalf.

Complaints
We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:
- Report a concern online at https://ico.org.uk/make-a-complaint/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact us
If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact your school's Data Protection Lead (School Business Manager/ Office Lead) in the first instance, or the Data Protection Officer.

Data Protection Officer – Helen Turner, 01482 505030, dpo@vennacademy.org.