

## Privacy Notice (How we use student information)

Hatton Academies Trust collects and holds personal information relating to our students at the following academies:

- Sir Christopher Hatton Academy
- Oakway Academy
- Victoria Primary Academy
- Ecton Village Primary Academy

This will include information about the students shared from their previous school, the Local Authority and/or the Department for Education.

## The categories of student information that we collect, hold and share include:

- personal identifiers and contacts, including parent information (such as name, unique pupil number, contact details and address)
- 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, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (such as key stage 1 and phonics results, post 16 courses enrolled for and any relevant results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)

## Why we collect and use this information

We use the student data:

- 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 meet the statutory duties placed upon us for the Department for Education (DfE) data collections

Under the General Data Protection Regulation (GDPR), the legal basis/bases we rely on for processing personal information for general purposes are:

- General Data Protection Article 6 (1) (a): the data subject has given consent for the processing of his/her personal data for one of more specific purposes
- General Data Protection Article 6 (1) (b): processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract
- General Data Protection Article 6 (1) (c): processing is necessary to comply with a legal obligation to which the controller is subject
- General Data Protection Article 6 (1) (d): processing is necessary in order to protect the vital interests of the data subject or of another natural person
- General Data Protection Article 6 (1) (e): processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller

In addition, concerning any special category data we will ensure that we comply with the following conditions:

- General Data Protection Regulation Article 9 (2) (a): the data subject has given explicit consent to the processing of those personal data for one or more specified purposes
- General Data Protection Regulation Article 9 (2) (b): processing is necessary for the purpose of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law
- General Data Protection Regulation Article 9 (2) (c): processing is necessary for the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent
- General Data Protection Regulation Article 9 (2) (e): processing relates to personal data which are manifestly made public by the data subject
- General Data Protection Regulation Article 9 (2) (f): processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity
- General Data Protection Regulation Article 9 (2) (g): processing is necessary for reasons of substantial public interest
- General Data Protection Regulation Article 9 (2) (h): processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis
- General Data Protection Regulation Article 9 (2) (i): processing is necessary for reasons of public interest in the area of public health
- General Data Protection Regulation Article 9 (2) (j): processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1)

## Collecting student information

We collect student information via registration forms at the start of the school year, Common Transfer Files (CTF), secure file transfers and paper files from previous schools.

Student data is essential for the schools' operational use. Whilst the majority of students 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 student information to us or if you have a choice in this.

## Storing student data

We keep personal information about students while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. Our Information and Records Management Retention Guidance sets out how long we keep information about students.

A copy of our Information and Records Management Retention Guidance can be obtained from our Data Protection Officer on request. Please e-mail [dataprotectionofficer@hattonacademiestrust.org.uk](mailto:dataprotectionofficer@hattonacademiestrust.org.uk)

## Who we share student information with

We routinely share student information with:

- schools that the pupils attend after leaving us
- our local authority
- youth support services (pupils aged 13+)
- the Department for Education (DfE)
- The student's family and representatives
- Educators and examining bodies
- Our regulator, Ofsted
- Some Suppliers and Service Providers (to enable them to provide the service we have contracted them for)
- Central and Local Government
- 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 and tribunals
- Professional bodies

## Why we share student information

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

## Youth support services

### Students aged 13+

Once our students reach the age of 13, we also pass student 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

A parent or carer 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/student once he/she reaches the age of 16.

### Students aged 16+

We will also share certain information about students 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
- work experience placement providers

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

## Department for Education (DfE) - NEW

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share the following information about our pupils with the Department for Education (DfE) either directly or via our local authority for the purpose of those data collections.

- school census and attendance
- exams information for key students
- suspensions and permanent exclusions
- admissions register

All data is transferred securely and held by the Department for Education (DfE) under a combination of software and hardware controls, which meet the current [government security policy framework](#).

For more information, please see 'How Government uses your data' section.

## Requesting access to your personal data

Under data protection legislation, parents and students 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 the Academy's Data Protection Officer at [dataprotectionofficer@hattonacademiestrust.org.uk](mailto:dataprotectionofficer@hattonacademiestrust.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

## Withdrawal of consent and the right to lodge a complaint

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 by contacting our Data Protection Officer, details below.

Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## 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 in November 2023.

## Contact

If you have any questions, concerns or would like to discuss anything in this privacy notice, please contact:

### Colin Hinds – Data Protection Officer

By e-mail: [dataprotectionofficer@hattonacademiestrust.org.uk](mailto:dataprotectionofficer@hattonacademiestrust.org.uk)

By telephone: 01933 231271

## 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 Department for Education (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 Department for Education (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 Department for Education (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-user-guide-and-supporting-information>

## Sharing by the Department for Education (DfE)

The law allows the Department for Education (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 Department for Education's (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 Department for Education (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 Department for Education (DfE) holds about you**

Under the terms of the [Data Protection Act 2018](#), you are entitled to ask the Department for Education (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>