

## Privacy Notice for Pupils

*This privacy notice is written in more child-friendly language, so should be easier for pupils to understand.*

You have a legal right to be informed about how your school uses any personal information that we hold about you. To comply with this, we provide a 'privacy notice' to you where we are processing your personal data. This privacy notice explains how we collect, store and use personal data about you.

We, The Consortium Trust are the 'data controller' for the purposes of data protection law. **Our data protection officer is: Andrew Aalders-Dunthorne**, CEO of Consortium Trust who can be contacted at Helmingham School House, School Lane, Helmingham, Suffolk, IP14 6EX or by email at: [a.aalders-dunthorne@consortiumtrust.org.uk](mailto:a.aalders-dunthorne@consortiumtrust.org.uk)

### The personal data we hold

We hold some personal information about you to make sure we can help you learn and look after you at school. For the same reasons, we get information about you from some other places too – like other schools, the local council and the government. This information includes:

- Your contact details;
- Your test results;
- Your attendance records;
- Your characteristics, like your ethnic background or any special educational needs;
- Any medical conditions you have;
- Details of any behaviour issues or exclusions;
- Photographs;
- CCTV images (where applicable);

### Why we use this data

We use this data to help run the school, including to:

- Get in touch with you and your parents/carers when we need to;
- Check how you're doing in exams and work out whether you or your teachers need any extra help;
- Track how well the school as a whole is performing;
- Look after your wellbeing;

### Special considerations for digital learning

The Trust uses google classroom to offer a remote digital learning platform including live and recorded teaching. It is noted that these lessons will capture personal data of teachers and may capture personal data of other stakeholders attending the lesson, but also potentially those that are not attending, for instance, comments made about others during the lessons.

The Consortium Trust, appreciates that additional measures are required due to the Trust's requirement for staff and pupils to engage in our remote digital learning platform. We note that teaching and learning from home is different to attendance in the classroom, we will at all times act to protect the privacy and personal data of all stakeholders.

This Privacy notice should be read in conjunction with the following Trust Policies:

- Online Safety;
- Mobile Devices;
- Safeguarding;
- Data Protection (GDPR).

**Limitation of purpose:** Recorded and live online lessons will not be used to judge competence or used as part of the performance management cycle. As is the case with teaching in the classroom, the Trust cannot guarantee that parental complaints will not be made, however, the Trust will not take into account complaints based on online observations from third parties. Notwithstanding any exceptional circumstances.

**Data minimisation:** Any recordings should only contain what is adequate, relevant and limited to the subject-matter being taught and should not contain unnecessary personal information, controversial opinions or comments that may cause offence. We will ensure that data held by the Trust remains professional in nature. All resources and recordings remain the intellectual property of the Trust, until a time that the Trust seeks to legally and legitimately dispose of them.

**Storage:** The Trust will not retain the recordings for longer than necessary. Lesson recordings that are single use will be held and then deleted within 28 days of the recording. Where a 'teaching session' is recorded to be part of a scheme of work may be retained indefinitely – similar to other recorded teaching resources.

**Security:** In line with the supporting policies as outlined above the Trust will ensure that appropriate security measures are in place to ensure confidentiality, integrity and the appropriate use of materials recorded.

### **Our legal basis for using this data**

We will only collect and use your information when the law allows us to. Most often, we will use your information where:

- We need to comply with the law;
- We need to use it to carry out a task in the public interest (in order to provide you with an education);
- Sometimes, we may also use your personal information where:
  - You, or your parents/carers have given us permission to use it in a certain way
  - We need to protect your interests (or someone else's interest)

Where we have got permission to use your data, you or your parents/carers 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/carers, 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.



### How we store this data

We keep personal information about pupils 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.

All pupil records are kept securely at all times. Paper records, for example, are kept in lockable storage areas with restricted access, and the contents are secure within the file. Equally, electronic records have appropriate security.

Access arrangements for pupil records ensure that confidentiality is maintained whilst equally enabling information to be shared lawfully and appropriately, and to be accessible for those authorised to see it.

### Data sharing

We do not share personal information about you with anyone outside the school without permission from you or your parents/carers, 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:

- Our local authority – to meet our legal duties to share certain information with it, such as concerns about pupils' safety and exclusions
- The Department for Education (a government department)
- Your family and representatives
- Educators and examining bodies
- Our regulator (the organisation or “watchdog” that supervises us), e.g. Ofsted;
- Central and local government
- Survey and research organisations
- Health authorities
- Health and social welfare organisations
- Police forces, courts, tribunals
- Suppliers and service providers – so that they can provide the services we have contracted them for
- Financial organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Professional bodies
- Security organisations

### National Pupil Database

We are required to provide information about you to the Department for Education (a government department) as part of data collections such as the school census. Some of this information is then stored in the [National Pupil Database](#), which is managed by the Department for Education and provides evidence on how schools are performing. This, in turn, supports research. The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards and others.

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

You can find more information about this on the Department for Education's webpage on [how it collects and shares research data](#). You can also [contact the Department for Education](#) if you have any questions about the database.



### Transferring data internationally

Where we share data with an organisation that is based outside the European Economic Area, we will protect your data by following data protection law.

### Your rights

#### 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'**, as long as we judge that you can properly understand your rights and what they mean. 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
- Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)
- Give you a copy of the information
- You may also ask us to send your personal information to another organisation electronically in certain circumstances.

If you want to make a request please contact our data protection officer.

### Your other rights over your data

You have other rights over how your personal data is used and kept safe, including the right to:

- Say that you don't want it to be used if this would cause, or is causing, harm or distress
- Stop it being used to send you marketing materials
- 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 it corrected, deleted or destroyed if it is wrong, or restrict our use of it
- Claim compensation if the data protection rules are broken and this harms you in some way

### 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. You can make a complaint at any time by contacting our data protection officer.

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

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 our data protection officer: Mr Andrew Aalders-Dunthorne, CEO, Consortium Trust, Helmingham School House, School Lane, Helmingham, Suffolk, IP14 6EX.

This notice is based on the [Department for Education's model privacy notice](#) for pupils, amended to reflect the way we use data in this school.