



## Privacy notice for parents/carers

Under data protection law, individuals have a right to be informed about how the Academy and City Learning Trust (CLT) uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about pupils/students.

We, The City Learning Trust (CLT), High Lane, Burslem, Stoke on Trent, ST6 7AB, is the 'data controller' for the purposes of data protection law.

Our data protection officer is Joanne Shaw (see 'Contact us' below).

The Headteacher/Principal, at Smallthorne Academy, acts as the representative of the data controller, in their Academy, on a day-to-day basis.

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

- Contact details (address, contact details and preferences of parent/carers,)
- School email address
- Date of Birth
- Unique Pupil Reference Number (UPN)
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Characteristics, such as eligibility for free school meals, or special educational needs
- Details of behavior issues and exclusion information
- Details of any medical conditions, including physical and mental health
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs taken in school
- Videos recorded in school
- Dietary requirements
- CCTV images captured in school
- Immigration information

We may also collect, store and use information about students/pupils that falls into 'special categories' of more sensitive personal data. This includes information about: (where applicable)

- Race, ethnicity, religious beliefs, sexual orientation
- Health, including any medical conditions, and sickness/attendance records
- Finger prints (biometric data)

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

## Why we use this data

We use this data to: (*this list is by no means exhaustive*).

- Support pupil learning
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Protect pupil welfare and safeguarding
- Assess the quality of our services
- Administer admissions waiting lists
- Complete and submit assessment data under statutory duties
- Undertake and meet obligations under statutory code of SEND and Equalities and Duties
- Comply with exclusions and fair access requests
- Carry out research
- Comply with the law regarding data sharing
- Get in touch with you or your child when we need to

## Our legal basis for using this data

We only collect and use pupils'/students' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest

Less commonly, we may also process students'/pupils' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

Some of the reasons listed above for collecting and using students'/pupils' personal data overlap, and there may be several grounds which justify our use of this data.

Where we have obtained consent to use students/pupils' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

## Collecting this information

While the majority of information we collect about students/pupils is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

## How we store this data

We keep personal information about students/pupils while they are attending the Academy. We may also keep it beyond their attendance at the Academy if this is necessary in order to comply with our legal obligations. Our Records Management Policy sets out how long we keep information about students/pupils.

You can obtain a copy of the Records Management Policy from our website or by contacting the Headteacher at the Academy.

## Data sharing

We do not share information about students/pupils 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 data protection law) we may share personal information about students/pupils with:

- Our local authority – to meet our legal obligations to share certain information, such as safeguarding concerns and exclusions.
- The Department for Education to meet our legal obligation to share certain information
- City Learning Trust member schools: *Haywood Academy, Mill Hill Primary Academy, Smallthorne Primary Academy, Trentham Academy*, this is to allow for the collaboration of teaching and learning across the Trust.
- The pupil's family and representatives to keep them informed of their child's performance in school.
- Examining bodies – to facilitate examinations and tests.
- Ofsted to meet our legal obligation under Section 5 and Section 8 of the Education Act 2005.
- Suppliers and service providers – to enable them to provide the service we have contracted them for.
- Security organisations to meet our legal obligation to ensure the safety and wellbeing of a pupil/student.
- Education and training providers and careers advisers to fulfil our legal duty to ensure that students in year 8 – year 13 have the opportunity to access a range of independent careers guidance.
- Health authorities and social welfare organisations to meet our legal obligation to ensure the safety and wellbeing of a pupil/student.
- Professional advisers and consultants to meet our legal obligation to ensure the safety and wellbeing of a pupil/student.
- Police forces, courts, tribunals to comply with the law.
- Professional bodies to meet our legal obligation to ensure the safety and wellbeing of a pupil/student

## National Pupil Database

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

Some of this information is then stored in the [National Pupil Database](#) (NPD), which is owned and managed by the Department 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 other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

For more information, see the Department'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

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.

## Parents' and students'/pupils' rights regarding personal data

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 13), or where the child has provided consent.

Parents also have the right to make a subject access request with respect to any personal data the school holds about them.

If you make a subject access request, and if we do hold information about you or your child, we will:

- 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

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

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

## Other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to 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 processing

To exercise any of these rights, please contact our data protection officer.

## 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.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- 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**:

Joanne Shaw  
City Learning Trust  
High Lane  
Burslem  
Stoke on Trent  
ST6 7AB

**Tel No:** 07940514736  
**Email:** [jshaw@citylearningtrust.org](mailto:jshaw@citylearningtrust.org)