



## Privacy Notice

### Pupils

The Cornerstone Academy Trust needs to collect, store and process data on pupils in order to be able to safeguard students, ensure their safety, welfare and progress and to effectively educate them. The data is also used to keep parents and carers updated on school events, progress and activities. Only essential data is held and there are clear processes in place that govern how we collect use, store and share the data.

Under data protection law, individuals have a right to be informed about how the school uses 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 pupils' personal data.

We, The Cornerstone Academy Trust, are the 'data controller' for the purposes of data protection law.

Our Data Protection Officer is Kyriaki Constanti. She can be contacted via [DPO@tcat.education](mailto:DPO@tcat.education)

### The personal data we hold

We process data relating to pupils. Personal data that we may collect, use, store and share (when appropriate) about pupils includes, but is not restricted to:

- Contact details including home & email addresses, telephone numbers and other online contact points and contact preferences, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Student and curricular records
- Characteristics, such as ethnic background, eligibility for free school meals, or special educational needs
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Correspondence and complaints
- Photographs
- CCTV images captured in school
- Biometric data where consent has been given

### Why we use this data

The purpose of processing this data is to help us govern the Trust, including to:

- To communicate with parents and carers about relevant school business

- To support student learning
- To monitor and protect student welfare
- To provide appropriate pastoral care
- Administer admissions and waiting lists
- Monitor and report on student progress
- Track how well the school and Trust is performing
- Protect the assets of the Trust
- Carry out research
- Comply with the law regarding data sharing

## Our lawful basis for using this data

We only collect and use personal information about pupils when the law allows us to. Most commonly, we use it where we need to:

- Comply with a legal obligation - **Article 6 (c) Legal obligation**
- Carry out a task in the public interest - **Article 6 (e) Public Task**

Some information we process will be Special Category data under **Article 9**. We will rely on the legal basis of **Article 9 (g)**: processing is necessary for reasons of substantial public interest.

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests) e.g. in a life or death situation
- We have legitimate interests in processing the data – e.g. where 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 as a publicly funded education establishment.

Where you have provided us with consent to use your data, you may withdraw this consent at anytime. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the Trust/school's use of your data.

## Collecting this information

While the majority of information we collect about pupils is mandatory, there is some information that parents & carers can choose whether or not to provide to us.

Whenever we seek to collect information about pupils, we make it clear whether it this information must be provided (and, if so, what the possible consequences are of not complying), or whether there is a choice.

## How we store this data

Data stored in paper format is kept securely and is accessible only by the appropriate teachers and administrative staff who have a legitimate need to access your data.

Data in electronic format is kept in a secure area on the Trust systems.

Once your involvement with the Trust has ended, we will retain this file and delete the information in it in accordance with our record retention schedule/records management policy.

## Data sharing

We do not share information about 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 with:

- Our local authority - to meet our legal duties to share certain information such as concerns about students' safety and exclusions
- The Department for Education – to comply with the legal requirements as this data sharing underpins school funding, educational policy and funding
- Police forces, courts, tribunals and security services – to comply with the relevant laws
- Health and social welfare organisations - to help look after the health and wellbeing of students
- Our payment service providers – to allow you to pay for meals, trips resources and activities
- Providers of electronic learning resources - to allow you to use their resources in class and at home

## 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.

## Your rights

### How to access personal information we hold about you.

Individuals have a right to make a **Subject Access Request (SAR)** to gain access to personal information that the school holds about them.

If anyone makes a SAR, and if we do hold relevant information about that subject, we will:

- Give a description of the information we hold
- Explain why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from the subject or their parent or carer
- Explain who it has been, or will be, shared with
- Advise whether any automated decision-making is being applied to the data, and any consequences of this
- Provide a copy of the information in an intelligible form

The subject may 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, Kyriaki Constanti

### Other rights regarding pupils' data

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 data being used to send direct marketing
- Object to the use of personal 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 processing

- Claim compensation for damages caused by a breach of the data protection regulations

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

## **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, Kyriaki Constanti.

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, Kyriaki Constanti.