Privacy Notice

Parents and Carers

The Cornerstone Academy Trust (TCAT) is required to collect, store and process data on parents and carers in order to be able to safeguard students and keep parents and carers informed about students' safety, welfare and progress. The data is also used to keep parents updated on school events, progress and activities. Only essential data is held and there are clear processesin 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 your personal data.

We, TCAT, are the 'data controller' for the purposes of data protection law.

Our Data Protection Liaison Officer is Kyriaki Constanti, who can be contacted via DPO@tcat.education

The personal data we hold:

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

- Contact details including email addresses, telephone numbers and other online contact points and contact preferences
- Home Address
- Correspondence and complaints
- Photographs
- CCTV images captured in school

Why we use this data:

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

- Communicate with you about relevant school business
- Support student learning
- Monitor and protect student welfare
- Provide appropriate pastoral care
- Administer admissions and waiting lists

Our lawful basis for using this data:

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

- **Article 6 (c) Legal obligation**: Comply with a legal obligation

- **Article 6 (e) Public Task:** Carry out a task in the public interest or in the exercise of official authority vested in the controller

Some information we process will be Special Category data. When we process special category data about you, we will rely on one or more of the following additional legal bases, as set out in Article 9 of the UK GDPR.

- You have given us your explicit consent
- It is necessary for the establishment, exercise or defence of a legal claim
- it is necessary for reasons of substantial public interest
- It is necessary for us to carry out our obligations and exercise our or the data subject's specific rights
- We need to protect your vital interests (or someone else's interests) e.g. in a life or death situation

Other legal bases listed in Article 9 of the UK GDPR may also apply, depending on the processing required.

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's use of your data.

Use of Microsoft 365:

As a showcase Trust for Microsoft and a key supporter of the DfE Edtech demonstrator programme, TCAT is a strong advocate for the use of technology to support learning and development and considers the use of M365 and its entire suite of applications, including Teams and Viva Engage to form an integral part of this ultimate aim by developing pupils for life in a digital world and as part of their social and cultural development.

Each child will be provided with a device and a M365 profile consisting of their full name, class, school and photograph, and will be trusted to access their device from home in order to complete homework and associated tasks.

As parents and carers, your role is to support your child in using Microsoft 365 (M365) at home, which may include assisting your child to log-on to their account and to engage with their home learning activities.

Parents and carers must not, however, browse or access their child's M365 account, including Teams, Viva Engage pages or other student account profiles. It is unlawful for parents or carers to impersonate pupils or attempt to contact students through any M365 applications, including Teams and Viva Engage. This is covered further within our Acceptable Use Agreements (insert link).

Safeguarding and Monitoring:

The Trust operates a safeguarding and monitoring system known as 'Lightspeed' which runs in the background on all school-managed devices and systems, including M365 applications, and provides safeguarding-related oversight of online activity. This monitoring is intended to protect pupils, staff and the school community, and is carried out in a way that respects privacy and professional expectations.

The system records key words typed and images viewed or shared. Any flagged content is reviewed by authorised staff. Where monitoring identifies a potential safeguarding concern, information may be shared with relevant internal teams, and, where necessary, external safeguarding agencies, in line with

statutory guidance.

Collecting your information:

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

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.

Security of your information:

We have put in place measures to protect the security of your information (ie to prevent it being accidentally lost, used or accessed in an unauthorised way).

Where we store your information electronically, it is held in a secure area on the Trust systems.

Data stored in paper format is kept securely by way of locked filing cabinets / rooms and restricted access permissions.

In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

Third parties will only process your personal information on our instructions and where they have agreed to treat information confidentially and to keep it secure.

Once your involvement with the Trust has ended, we will retain this file and delete the information in accordance with our Records Retention Schedule.

We have put in place procedures to deal with any suspected data security breach and will notify you and the Information Commissioner's Office of a suspected breach where we are legally required to do so.

For further information regarding how the Trust keeps your personal data safe, please refer to our Data Protection Policy.

Who do we share data with and why?

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

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

- Our local authority - to meet our legal duties
- 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

Transferring data internationally:

Every effort is taken to try and use third party suppliers within the boundaries of the European Economic Area (EEA) to ensure the data protection rights of individuals. However, there may be occasions where

the system supplied by an organisation is outside of the EEA for example the United States. Where personal data is transferred outside the UK or EEA to a country that is not designated as 'adequate' in relation to data protection law, we will ensure the personal data is adequately protected using International Data Transfer Agreements, appropriate security measures, and other appropriate safeguards.

Freedom of Information Act 2000 and Environmental Information Regulations 2004:

TCAT is considered to be a public authority for the purposes of the Freedom of Information Act 2000 (FOI) and the Environmental Information Regulations 2004 (EIR). As such, our school is subject to requests made under this legislation. When responding to these requests, we will not disclose personal information relating to pupils or those holding parental responsibility without consent, as to do so would contravene data protection principles.

Your Data Protection Rights:

Your right of access
You have the right to ask us for copies of your personal data. There are some exemptions, which means you may not always receive all the information we process.

Your right to rectification
You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure
You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing
You have the right to ask us to restrict the processing of your information in certain circumstances.

Your right to object to processing
You have the right to object to us processing your information where we consider this is necessary for us to perform a task in the public interest. You can also object to us using your contact details to send you direct marketing or fundraising communications.

Your right to data portability
This only applies to information you have given us. You have the right to ask that we transfer the information you gave us from one organisation to another or give it to you. The right only applies if we are processing information based on your consent or under a contract (or in talks about entering into a contract) and the processing is automated.

Your right to withdraw consent
In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact DPO@tcat.education

Once we have received your notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to unless we have another legitimate basis for doing so in law.

If you have any queries about this privacy notice, or the way your personal information is being handled by the school, see our Data Protection Policy which is publicly available on our website or please contact our Data Protection Liaison Officer.

Your right to complain

We work to high standards when it comes to processing your personal information. We hope you will always be happy with the way we handle your information, however if we have not met your expectations, please let us know so we can put things right. To make a complaint, please complete our Data Protection Complaints Form, available on our website or directly via the link below:

Data Protection Complaints Form - The Cornerstone Academy Trust

If you remain dissatisfied, you have the right to complain to the Information Commissioner's Office (ICO). The ICO's contact details are available at https://ico.org.uk/concerns

You are not required to pay a charge for exercising your rights and we have one calendar month to respond to you, which can be extended by up to a further two calendar months for complex requests. Please bear in mind that this may be difficult for us to achieve should you submit your request either just before or during a school holiday, however we will do our best to keep you informed about when you can expect us to respond to you.

Further Information

If you have any queries about this privacy notice, or the way your personal information is being handled by the school, see our Data Protection Policy which is publicly available on our website.

To exercise any of these rights, please contact our Data Protection Liaison Officer.

Updates to this Notice

Reviewed by (job role):	**Date:**	**Next Review Date:**
Full Trust Board	February 2024	February 2026
DPO / DPLO	24th February 2026	February 2028
DPO	21st May 2026	May 2028
DPLO	5th October 2026	May 2028