Privacy Notice

Pupils

The Cornerstone Academy Trust (TCAT) is required to collect, store and process pupil data in order to effectively educate students, safeguard, ensure their safety, welfare and progress. 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, 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 pupils. Personal data that we may collect, use, store and share (when appropriate) about pupils includes, but is not restricted to:

- Personal Identifiers e.g full name, date of birth and UPN (Unique Pupil Number)
- Contact details including home & email addresses, telephone numbers and other online contact points, contact preferences, and identification documents
- Educational performance, assessment, achievement and attainment data
- Student and curricular records
- Behavioural information including exclusions and any alternative provision put in place.
- Attendance Information including sessions attended, absence information and data from previous schools
- Any correspondence with pupils / parents, including complaints
- Photographs and videos
- Data relating to extra-curricular activities
- School travel arrangements
- IT usage data for example login details and online learning platforms

Sensitive Information
Sensitive information (special category data) is personal data that requires more protection because it is sensitive. This includes, but is not limited to:

- free school meal eligibility,
- ethnicity (including language spoken and nationality), religion or beliefs.
- Safeguarding information such as court orders, concerns about child protection or safety and any professional involvement ie, social care.

- Information relating to special educational needs.
- Relevant medical conditions the school need to be aware of such as doctors' information, child health, dental health, allergies, medication and dietary requirements.
- Information about local authority funding such as Pupil Premium.
- CCTV footage

Why we collect this data:
The personal data we collect for pupils is essential and enables the school to fulfil their official functions and meet legal requirements. We need this information to:

- assess the pupil's eligibility to attend our school and process their admission request.
- build a picture of pupils' educational, social and health needs, so that we can support them and provide pastoral care where required.
- keep children safe and for safeguarding and welfare purposes.
- support pupil learning, wellbeing and to help them reach their educational goals.
- monitor and report on pupil progress, attainment, attendance, and behaviour.
- provide library, ICT and learning resources.
- communicate with our pupils and those with parental responsibility regarding homework, progress and other important school matters.
- comply with the law and fulfil our legal obligations.
- assist in the prevention or detection of crime.
- maintain pupil records.
- assess eligibility for funding, bursaries, and grants.
- respond to complaints, grievances, and discipline investigations.
- keep you informed about emergencies and events.
- process payments.
- assess the quality of our services.
- meet statutory duties placed upon us by the Department for Education.
- provide cashless catering services (this relates to the collection of student fingerprints).

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.

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.

Processing for marketing purposes
The school may send marketing information eg, details of fundraising activities when we have received consent to do so. Consent can be withdrawn at any time by contacting the school.

Automated decision making and profiling
The school does not use any of your personal data to make automated decisions about you or to profile you. If this changes in any way in the future, the school will update their privacy notices accordingly to explain the nature of the processing and your right to object to it.

Our lawful basis for using this data
We only collect and use student personal information when the law allows us to do so. When processing personal data about our pupils, we rely upon the following legal bases, which are set out in Article 6 of the UK GDPR.

- Comply with a legal obligation**;**
- Carry out a task in the public interest or in the exercise of official authority vested in the controller;

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.

When we process special category data about our pupils, we rely on one or more of the following additional legal bases, as set out in Article 9 of the UK GDPR:

- the data subject has given us their explicit consent
- it is necessary for us to carry out our obligations and exercise our or the data subject's specific rights
- processing is necessary to protect the vital interests of a person where the data subject is physically or legally incapable of giving consent
- it is necessary for the establishment, exercise or defence of a legal claim
- it is necessary for reasons of substantial public interest

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.

Who do we share data with and why?
We routinely share pupil information with:

- the school that the pupil attends after leaving us.

- our local authority.
- the Department for Education (DfE).
- other local authorities where relevant.
- the school governing body / trustees.
- examination boards
- educational software providers
- law enforcement (where required)
- NHS/school nurse.
- external systems which the school decide to use to assist them with day-to-day activities to support the efficient running of the school.

We are required to share information about our pupils with the DfE, either directly or via our local authority for various statutory data collections.

Our duty to share this information comes under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

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 DfE. To find out more about the NPD, go to Apply for Department for Education (DfE) personal data - GOV.UK

The law allows the DfE to share pupils' data with certain third parties. For more information about the Department's NPD data sharing process, please visit: How DfE shares personal data - GOV.UK

For information about which organisations the DfE has provided pupil information to, how the DfE collects and shares pupil data for research purposes, visit their website: DfE external data shares - GOV.UK

Children in need and looked after children information
We are required to share information with the DfE about our pupils who are 'children in need' or 'looked after', so the DfE can carry out their statutory duties regarding data collections. Our duty to share this information comes under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

To find out more about the data collection requirements placed on us by the DfE go to:

Children in need: Children in need census: guide to submitting data - GOV.UKhttps://www.gov.uk/guidance/children-in-need-census

Children looked after: Children looked after return: guide to submitting data - GOV.UK

Local authorities
We may be required to share information about our pupils with the local authority, to ensure they can carry out their statutory duties under the Schools Admission Codehttps://www.gov.uk/government/publications/school-admissions-code--2, including conducting Fair Access Panels.

We may also be required to share child protection or safeguarding information with them, so we can carry out our statutory duties under section 11 of the Children's Act 2004 (duty to safeguard and promote the welfare of children) and to enable the local authority to carry out their duties under section 47 of the Children's Act 1989 (duty to investigate and take action to safeguard children).

Other schools
We are required to share a pupil's Common Transfer File and educational record with their next school

when they leave us. We are also required to share a pupil's 'curricular record' with the pupil's intended school, upon request. We are required to share this data under The Education (Pupil Information) (England) Regulations 2005.

Educational psychologists and other professionals
We may share information about a pupil with educational psychologists, health workers (including the school nurse), social workers or other professionals, to ensure the pupil receives the appropriate health, wellbeing, and educational support they need. Sharing in these instances, will be carried out with the consent of the parent/carer and/or pupil, where required.

Standards and Testing Agency
We are required to share information about pupils in Early Years Foundation Stage, year 2 and in year 6 to the Standards and Testing Agency, so they can facilitate and report on our key stage 1 and key stage 2 national curriculum tests (commonly referred to as SATs). More information about SATs are available at: National curriculum assessments: information for parents - GOV.UK and here Early years foundation stage profile return - GOV.UK (www.gov.uk)

How we collect your personal data
When a child joins our school, we collect pupil information using admission forms completed by the parent/carer. We also collect information using data collection forms (either manually or electronic), information produced from our day-to-day interactions with pupils and parents, information provided by previous schools, local authorities, NHS, Police, the Department for Education and by secure Common File Transfer (CTF).

Most of the information provided is mandatory, but some if it is requested on a voluntary basis. When we ask for your information, we will make it clear whether you are required to provide your information and your rights in relation to any request.

Retention Periods
Except as otherwise permitted or required by applicable law or regulation, we will only retain personal data for as long as necessary to fulfil the purposes we collected it for as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

Full details on how long we will retain your personal data for is set out in our Records Retention Schedule available on our website.

Data is securely deleted when no longer needed.

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 securely on the school's IT network. Secure storage is also provided for paper-based records 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.

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.

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.

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, please see our Data Protection Policy which is publicly available on our website or please contact our Data Protection Liaison Officer.

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