



# PRIVACY NOTICE

The Central Team and DPO will review this notice on a 2 yearly cycle

Approved by/ date:	Sept 2023
Next review:	Sept 2025

## **The Sea View Trust Privacy Notice**

The Sea View Trust ('the Trust') is required by law to collect and process personal data relating to all of its pupils. The Trust is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

This privacy notice provides you with information about how we collect and process personal data of our pupils and their parents/carers in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you (e.g. privacy notices which are specific to particular schools within the Trust), so that you are aware of how and why we are using such information.

## Who are we?

The Sea View Trust is a multi-academy trust incorporating a number of different schools and academies. Our registered office address is Ewood Campus Clod Lane, Haslingden, Rossendale, England, BB4 6LR. We are registered with the Information Commissioner's Office (registration number ZA742257). This privacy notice has been issued on behalf of The Sea View Trust. When we refer to "we", "us", "our" or "the Trust" within this privacy notice, we are referring to the Sea View Trust. The Sea View Trust is the 'data controller' for the purposes of data protection law.

The Sea View Trust has appointed a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

## What data do we collect?

The Trust collects and processes a wide range of information about pupils, parents and carers. This includes:

- Personal information such as their name, date of birth, unique pupil number and address;
- Characteristics such as their ethnicity, language, nationality, country of birth and free school meal eligibility;
- Attendance information such as the number of sessions they have attended, the number of absences and the reasons for those absences.
- Assessment information such as their current pupil progress, their predicted progress and where appropriate data relating to any assessments, tests or exams they have undertaken.
- Relevant medical information including any conditions or allergies a pupil or parent/carer may have, the need for epi-pens/medication, emergency contacts and doctor's details.
- Special educational needs information. This includes information about any particular needs that your child has, any funding that is received specifically for your child, statements of individual need and health care plans.
- Behavioural information, which may include information about your child's general classroom behaviour including any awards gained, together with any detentions fixed-term or permanent exclusions they have received.
- Information relating to ethnicity, nationality and religion.
- Pastoral and safeguarding information, including notes on any home visits undertaken.
- Financial records about any money you have paid us; any amount(s) outstanding and associated recovery action. Depending on your chosen method of payment, we may hold your bank account details.
- Photographs.
- Details of any other information that is provided to us by pupils and parents/carers whilst during the course of our relationship with you.
- CCTV images.

## Why do we collect and use this information?

We have set out below a description of all the ways we plan to use pupil and parent/carer information, and which of the legal bases we rely on to do so. We may process pupil and parent/carer information for more than one lawful ground depending on the specific purpose for which we are using your information.

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
To support pupil learning	Contact details and characteristics	Necessary to comply with our legal obligations

	Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information	Necessary for the performance of a task carried out in the public interest
To monitor and report on pupil progress, enabling suitable interventions to be put in place where required	Contact details and characteristics Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information	Necessary to comply with our legal obligations Necessary for the performance of a task carried out in the public interest
To provide appropriate pastoral care and ensure your child has access to appropriate support	Contact details and characteristics Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information	Necessary to comply with our legal obligations Necessary for the performance of a task carried out in the public interest
To assess the quality of our services	Contact details and characteristics Attendance information Assessment information Special educational needs information Behavioural information	Necessary to comply with our legal obligations Necessary for our legitimate interests to improve the Trust's performance

	Pastoral and safeguarding information	
To keep pupils and staff safe	Contact details and characteristics Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information Photographs CCTV	Necessary to comply with our legal obligations  Necessary for the performance of a task carried out in the public interest
To comply with the law regarding data sharing	Contact details and characteristics Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information	Necessary to comply with our legal obligations  Necessary for the performance of a task carried out in the public interest
To comply with statutory duties placed upon us for Department for Education data collections	Contact details and characteristics Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information	Necessary to comply with our legal obligations  Necessary for the performance of a task carried out in the public interest
To communicate with parents/carers and provide	Contact details and characteristics	Necessary to comply with our legal obligations

updates relating to pupil learning	Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information Photographs	Necessary for our legitimate interests to improve the Trust's communications with parents/carers  Consent
To process payments from parents/carers	Contact details and characteristics  Financial information	Necessary for the performance of the contract

### Purposes for processing – Special Category Data

We have set out below a description of all the ways we plan to use more sensitive “special category data” of pupils and parents/carers, and which of the legal bases we rely on to do so. We may process pupil and parent/carer information for more than one lawful ground depending on the specific purpose for which we are using your information.

<b>Purpose/Activity</b>	<b>Type of Information</b>	<b>Lawful Basis for Processing Information</b>
To ensure your dietary needs are catered for	Medical information	Vital interests  Necessary to comply with our legal obligations  Schedule 1, Part 2, (6) Data Protection Act 2018 - Statutory Purposes
To make reasonable adjustments for the provision of learning	Medical information	Necessary to comply with our legal obligations  Schedule 1, Part 2, (6) Data Protection Act 2018 - Statutory Purposes
For statistical analysis of our pupils	Race, nationality and ethnicity information	Necessary to comply with our legal obligations  Schedule 1, Part 2, (6) Data Protection Act 2018 - Statutory Purposes

To keep pupils and staff safe	Medical information  Behavioural information  Pastoral and safeguarding information	Necessary to comply with our legal obligations  Necessary for reasons of substantial public interest  Schedule 1, Part 2, (18) Data Protection Act 2018 - Safeguarding children and adults at risk  Schedule 1, Part 1, (3) Data Protection Act 2018 - Public Health
To support pupils with special educational needs	Special educational needs information  Medical information	Necessary to comply with our legal obligations  Necessary for reasons of substantial public interest  Schedule 1, Part 2, (6) Data Protection Act 2018 - Statutory Purposes

### **Collecting pupil and parent/carer information**

Generally, the information we hold will have been provided by pupils and parents/carers (e.g. information inputted into our management information system or when we communicate with you), but we may also hold information provided by third parties where this is relevant to your own circumstances. Whilst the majority of the pupil and parent/carer information you provide to us is required by law, some of it is provided to us on a voluntary basis. In order to comply with the UK GDPR, when requesting information, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

### **Storing pupil data**

We hold pupil and parent/carer data for the duration your child is at the school. When your child transfers to secondary school their school file will transfer with them; a copy will not be held by the Trust.

Any information held by the Trust which does not form part of the school file will be kept for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of personal information are available upon request. After this period, we will securely destroy or anonymise personal information in accordance with data protection law.

### **Who we share information with**

We routinely share pupil and parent/carer information with:

- Schools that your child attends after leaving us
- Our Local Authority

- The DfE
- Examining bodies
- Ofsted
- Law enforcement agencies
- Courts and tribunals
- Schools and academies within the Trust
- Our auditors, insurers and other professional advisers
- Health and social welfare organisations
- Our catering provider
- Our Speech and Language provider
- Other third parties we may engage the services of for the purpose of providing a public task or the administration of the Trust, for example our safeguarding monitoring software, our management information system provider.

### **Why we share information**

We do not share information about our pupils or parents/carers with anyone without consent unless the law and our policies allow us to do so. We share pupils' data with the DfE on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

We are required to share information about our pupils with the DfE 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 Department for Education, for example the obligation on us to complete and return the school census, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

### **The National Pupil Database (NPD)**

The NPD is owned and managed by the DfE and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the DfE. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

We are required by law to provide information about our pupils to the DfE as part of statutory collections such as the school census and early year's census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information about Individual Pupils) (England) Regulations 2013. To find out more about NPS, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

The DfE share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- Conducting research or analysis
- Producing statistics
- Providing information, advice and guidance

The DfE has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- Who is requesting the data
- The purposes for which it is required
- The level and sensitivity of data requested; and
- The arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of data.

For more information about the DfE's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>.

For information about which organisations the DfE has provided pupil information to, and for which project, please visit: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>.

To contact DfE please visit: <https://www.gov.uk/contact-dfe>

### **Requesting access to your personal data**

Under data protection legislation, parents/carers and pupils have the right to request access to information about them that we hold. To make a request for your personal information contact the Trust's Data Protection Officer via e-mail [dataprotectionofficer@forbessolicitors.co.uk](mailto:dataprotectionofficer@forbessolicitors.co.uk).

You also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress.
- Prevent processing for the purpose of direct marketing.
- Object to decisions being taken by automated means.
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed.
- To restrict our processing of personal data in certain circumstances.
- Claim compensation for damages caused by a breach of data protection law.

If you have a concern about the way we are collecting or using your personal data we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>.

### **Withdrawal of consent**

Where the processing of data is based on your consent you have the right to withdraw that consent at any time by notifying [dataprotectionofficer@forbessolicitors.co.uk](mailto:dataprotectionofficer@forbessolicitors.co.uk) in writing.

### **Contact**

If you would like to discuss anything contained within the privacy notice please contact: - [dataprotectionofficer@forbessolicitors.co.uk](mailto:dataprotectionofficer@forbessolicitors.co.uk)