

ENDEAVOUR LEARNING TRUST

PUPIL DATA PRIVACY STATEMENT

1 INTRODUCTION

- 1.1 Endeavour Learning Trust (“the Trust”) is committed to protecting the privacy and security of its pupils’ personal information. This Pupil Privacy Statement provides you with important information about what, how, where, why and when the Trust collects and processes your personal data.
- 1.2 This statement should be read in conjunction with our Data Protection Policy which contains more generalised information about our data protection procedures.
- 1.3 The Trust is what is known as the ‘Controller’ of the personal data you provide to us or which we collect from third parties. This means that the Trust is responsible for deciding what personal data (information) we gather and how we hold and use it.
- 1.4 The Trust is registered with the Information Commissioner’s Office (ICO).
Registration number ZA462273.
- 1.5 The Trust processes your personal data in accordance with data protection law. This includes the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- 1.6 This statement applies to all pupils aged 13 and over. Parents and pupils under 13 must refer to our other privacy statement for parents and pupils under 13. This statement also applies to data provided as part of any events, awards, competition or prize draws the Trust administers.

2 WHAT IS PERSONAL DATA?

- 2.1 Personal data is any information that ‘relates to’ an identified or identifiable individual. It includes information relating to you, from which we can identify you directly or indirectly (e.g. because it includes your name).
- 2.2 It also includes information relating to you, from which you cannot be directly identified, if you can be identified from that information when it is used in combination with other information we hold about you.
- 2.3 Personal data can include information relating to you that has been ‘pseudonymised’, meaning that any information that directly or indirectly identifies you (e.g. your name) is removed and replaced with one or more artificial identifiers or pseudonyms (e.g. pupil number).
- 2.4 However, truly anonymous data, or data that has had any identifying information permanently removed from it, does not count as personal data.
- 2.5 When considering whether information ‘relates to’ you or your child for the purposes of Data Protection Legislation, we consider a range of factors, including the content of the information, the purpose or purposes for which we are processing it, and the likely impact or effect of that processing on you.

3 WHAT IS ‘PROCESSING’?

- 3.1 Any activity that involves the use of your personal data is referred to as processing (or process). It includes:
 - 3.1.1 Obtaining, recording or holding personal data (e.g. asking you to complete forms);
 - 3.1.2 Carrying out any operation or set of operations on personal data such as organising, amending, retrieving, using, disclosing, erasing or destroying it (e.g. recording relevant information on the pupil’s file); and



- 3.1.3 Transmitting or transferring personal data to third parties (e.g. transferring data to local youth services).

4 WHAT TYPES OF PERSONAL DATA DO WE COLLECT & PROCESS?

- 4.1 Any activity that involves the use of your personal data is referred to as processing. The Trust processes many different categories of pupil information. This may include:
 - 4.1.1 personal identifiers and contacts (such as name, unique pupil number, contact details and address);
 - 4.1.2 characteristics (ethnicity, language, free school meal eligibility);
 - 4.1.3 safeguarding information;
 - 4.1.4 special educational needs;
 - 4.1.5 medical and administrative;
 - 4.1.6 attendance;
 - 4.1.7 assessment and attainment;
 - 4.1.8 trips and activities;
 - 4.1.9 identity management/authentication; and,
 - 4.1.10 behavioural information.
- 4.2 The Trust will also collect and process your data from the information you provide to us when you attend an event (e.g. Endeavour Awards) or enter a competition, prize draw or survey run by the Trust. This data will be used for the purposes of managing and administering the event or competition, including notifying you if you are a winner.
 - 4.2.1 Personal identifiers and contacts (name, email, age category, mobile number, postcode)
 - 4.2.2 Description of your entry.

5 HOW DO WE COLLECT YOUR PERSONAL DATA?

- 5.1 Most of the personal data the Trust collects is provided to us directly by you. We also collect your information via digital and/or paper registration forms, and access to the Arbor App (school management information system).
- 5.2 Most of the information you provide to us is mandatory, however, some will be requested on a voluntary basis. In order to comply with data protection legislation, we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this.

6 HOW DO WE USE YOUR PERSONAL DATA?

- 6.1 Most of the personal data relating to pupils the Trust processes is provided to us directly by you for one of the following reasons;
 - 6.1.1 to support learning;
 - 6.1.2 to monitor and report on your attainment and progress;
 - 6.1.3 to provide appropriate pastoral care;
 - 6.1.4 to assess the quality of our services;
 - 6.1.5 to keep you safe;
 - 6.1.6 to advise of any curriculum related, enrichment or community based activities we undertake or encourage you to attend; and,
 - 6.1.7 to meet our statutory duties.



- 6.2 The Trust also receives personal information indirectly, from the following sources;
- 6.2.1 social services;
 - 6.2.2 the police;
 - 6.2.3 your parents; and,
 - 6.2.4 medical professionals.
- 7 **LAWFUL BASIS**
- 7.1 We collect and use pupil information under Article 6 of the UK GDPR. These Articles set out the lawful reasons that we can process pupil data. We rely on the following for the vast majority of the processing we undertake:
- 7.1.1 Article 6.1a – consent (in limited circumstances);
 - 7.1.2 Article 6.1c – processing is necessary for compliance with a legal obligation to which we are subject; or
 - 7.1.3 Article 6.1e – processing is necessary for the performance of a task carried out in the public interest.
- 7.2 We also process special categories of personal data which includes health information, sexual orientation, religious/philosophical beliefs and ethnic origin. When processing this information we need to rely on a condition under Article 9 of the UK GDPR, along with further conditions as set out under Schedule 1 of the Data Protection Act 2018. For the majority of pupil data we process we rely on the following conditions:
- 7.2.1 Article 9.2g – processing is necessary for reasons of substantial public interest; or
 - 7.2.2 Article 9.2a - explicit consent.
- 7.3 We may process criminal offence data and some special category data in accordance with the conditions set out in Schedule 1 Data Protection Act 2018. The conditions include, but are not limited to:
- 7.3.1 For the purpose of employment, social security and social protection law
 - 7.3.2 Consent
 - 7.3.3 Counselling
 - 7.3.4 Preventing and detecting an unlawful act
 - 7.3.5 Safeguarding children
 - 7.3.6 Preventing fraud
 - 7.3.7 Equality of opportunity or treatment
- 8 **HOW DO WE STORE YOUR PERSONAL DATA?**
- 8.1 The Trust stores pupil data for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please see our data retention policy on the Trust's or School's website.
- 8.2 In terms of competitions, the data is retained only for the purpose of administering the competition and deleted within three months after the event or end of the competition.
- 9 **WHO DO WE SHARE YOUR PERSONAL DATA WITH?**
- 9.1 The Trust does not share your information with anyone without consent unless the law and (if applicable) our policies allow us to do so.



- 9.2 The Trust will routinely share pupil information with;
- 9.2.1 any school that you attend after leaving;
 - 9.2.2 the local authority;
 - 9.2.3 youth support services;
 - 9.2.4 the Department for Education (DfE);
 - 9.2.5 the NHS; and,
 - 9.2.6 within our Multi Academy Trust.
- 10 **CHANGES TO YOUR PERSONAL DATA**
- 10.1 It is important that the personal data we hold about pupils is accurate and current. Please keep us informed if your personal information changes during their time at the school in the Trust.
- 11 **WHERE IN THE WORLD IS YOUR PERSONAL DATA TRANSFERRED TO?**
- 11.1 If any of our processing activities require your personal data to be transferred outside the UK or European Economic Area, we will only make that transfer if:
- 11.1.1 the country to which the personal data is to be transferred ensures an adequate level of protection for personal data;
 - 11.1.2 we have put in place appropriate safeguards to protect your personal data, such as an appropriate contract with the recipient;
 - 11.1.3 the transfer is necessary for one of the reasons specified in data protection legislation, such as the performance of a contract between us and you; or
 - 11.1.4 you explicitly consent to the transfer.
- 12 **YOUR DATA PROTECTION RIGHTS**
- 12.1 Under data protection law, you have rights, including;
- 12.1.1 **Right to be informed** – about how and why your data is being used.
 - 12.1.2 **Right of access** – you have the right to ask us for copies of your personal information;
 - 12.1.3 **Right to rectification** – you have the right to ask us to rectify personal information you think is inaccurate or to ask us to complete information;
 - 12.1.4 **Right to erasure** – you have the right to ask us to erase your personal information in certain circumstances;
 - 12.1.5 **Right to restriction of Processing** – you have the right to object to the Processing of your personal information in certain circumstances;
 - 12.1.6 **Right to data portability** – you have the right to ask that we transfer the personal information we hold about you to another organisation.
 - 12.1.7 **Right to not to be subject to a decision based solely on automated processing** – for decisions that have a have a legal or similarly significant effect on individuals.
- 12.2 You are not required to pay any charge for exercising your rights. If you make a request we must respond in one month.
- 12.3 Please contact the school directly or Catherine White, Data Protection Officer, 01772 817904, c.white@endeavourlearning.org if you wish to make a request.



13 HOW TO COMPLAIN OR WITHDRAW CONSENT

- 13.1 If you have any concerns about our use of your personal information, wish to exercise your rights in relation to your Personal Data, or make a complaint, please let us know by contacting Catherine White, Data Protection Officer, 01772 817904, c.white@endeavourlearning.org
- 13.2 You can also complain to the Information Commissioner's Office (ICO) if you are unhappy with how we have used your data.

14 CHANGES TO THIS DATA PRIVACY STATEMENT

We keep our practices and policies regarding the collection, processing and security of Personal Data under continual review and may update them from time to time. We therefore reserve the right to change this Data Privacy Statement at any time. We will notify you of any changes made at the appropriate time and may re-issue a new Data Privacy Statement if appropriate.

Reviewed: Spring 2025