

This Privacy Notice has been written to inform parents and pupils of Hartlepool Aspire Trust about what we do with your personal information. This Notice may be subject to change.

### **Who are we?**

Hartlepool Aspire Trust is a 'Data Controller' as defined by Article 4 (7) of the UK GDPR. This means that we determine the purposes for which, and the manner in which, your personal data is processed. We have a responsibility to you and your personal data and will only collect and use this in ways which are compliant with data protection legislation.

The Trust has appointed Veritau Ltd to be its Data Protection Officer (DPO). The role of the DPO is to ensure that the school is compliant with the UK GDPR and to oversee data protection procedures. If you would like to discuss anything in this privacy notice, please contact Louise Robson, Head of Corporate Services on 01429 264036 or Veritau Ltd. Veritau's contact details are:

Schools Data Protection Officer  
Veritau Ltd  
County Hall  
Racecourse Lane  
Northallerton  
DL7 8AL

[schoolsDPO@veritau.co.uk](mailto:schoolsDPO@veritau.co.uk)  
01904 554025



*Please ensure you include the name of your school in all correspondence*

### **What information do we collect?**

The categories of information that we collect, hold and share include the following:

- Personal information of pupils and their family members (e.g. name, pupil number, DOB and address)
- Educational and assessment attainment (such as KS1 and phonics results, post 16 courses and relevant results)
- Free school meal eligibility
- Attendance information (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- Behavioural information (such as exclusions and any relevant alternative provision put in place)
- Safeguarding information (including but not limited to court orders and professional involvement)
- Photographs and communication preferences
- School/college trips
- Extra curricular activities
- Before and after school/college clubs
- CCTV Information
- Data about your use of the school/college's information and communication system (e-monitoring)

We will also process certain 'special category' data about our pupils including:

- Relevant medical information - please be aware that where the pupil has a severe allergy or is thought to be at risk of needing emergency care for a medical issue then this will be shared with all relevant staff members. We may do this in the form of photo identification in the staff room/kitchen to ensure that all staff members are aware of the issues should an emergency situation arise
- Special Educational Needs and Disabilities information (including the needs and ranking)
- Race, ethnicity and religion
- The school may also have information relating to you or your child's sexual orientation and/or sexual activity. This is not routine and only likely to be collected if there is a safeguarding risk.

### **Why do we collect your personal data?**

We use the information we collect:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- contact you and your parents when we need to
- to assess the quality of our services
- monitor equal opportunities
- to keep children safe (food allergies or emergency contact details) to meet the statutory duties placed upon us by the DfE
- we also may keep some information for historical and archiving purposes in the public interest

Any personal data that we process about our pupils and parents is done so in accordance with Article 6 and Article 9 of the UK GDPR.

Our legal basis for processing your personal data, in line with Article 6(1)(c) (legal obligation) includes (but not necessarily limited to):

- Education Act 1944, 1996, 2002, 2011
- Education and Adoption Act 2016
- Education (Information About Individual Pupils)(England) Regulations 2013
- Education (Pupil Information) (England) Regulations 2005
- Education and Skills Act 2008
- Children Act 1989, 2004
- Children and Families Act 2014
- Equality Act 2010
- Education (Special Educational Needs) Regulations 2001

We also process information in accordance with Article 6(e) (public task), Article 6(a) (consent), Article 9 (2)(a) (explicit consent where applicable) and Article 9(2)(g) (reasons of substantial public interest).

We mainly collect pupil information through admission forms and common transfer file or secure file transfer from previous school/college. The majority of pupil information you provide to us is mandatory in line with your parental responsibility – for further details please see the following link <https://www.gov.uk/government/publications/dealing-with-issues-relating-to-parental-responsibility/understanding-and-dealing-with-issues-relating-to-parental-responsibility>.

However, some information we ask for on a voluntary basis. When we do process this additional information we will ensure that we ask for your consent to process it.

Where we are processing your personal data with your consent you have the right to withdraw that consent. If you change your mind, or are unhappy with our use of your personal data, please let us know by contacting Louise Robson, Head of Corporate Services on 01429 264036.

### **Who do we obtain your information from?**

Much of the information we process will be obtained directly from you (pupils and parents). We will also process information received from:

- Department for Education (DfE)
- Local Education Authority (Hartlepool Borough Council)
- Previous schools/colleges attended

### **Who do we share your personal data with?**

#### **We routinely share pupil information with:**

- schools that pupils attend after leaving us
- Catcote Futures if you choose to transfer there after Catcote Academy
- our Local Education Authority (Hartlepool Borough Council), to ensure that they can conduct their statutory duties under the School Admissions Code, including Fair Access Panels
- where a student attends Catcote Academy from out of town we will share information with their Local Authority, to ensure that they can conduct their statutory duties under the School Admissions Code, including Fair Access Panels
- the Department for Education (DfE)
- Youth Support Services

For more information on information sharing with the DfE (including the National Pupil Database and Census) please go to:

<https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

#### **We may also share pupil information with:**

- Your family and other people who your parent/carer have agreed we can contact regarding your education and wellbeing
- Educators and examining bodies – to enable you to achieve and progress
- Our regulator - Ofsted (the organisation or “watchdog” that supervises us)
- Suppliers and service providers – so that they can provide the services we have contracted them for
- Financial organisations – in order to access support funding
- Our auditors – in order to make sure we provide accurate financial information
- Computerised systems for the storage and processing of data
- Health authorities and school nurse regarding your health and immunisations
- Health and social welfare organisations regarding your EHC plan
- Police forces, courts, tribunals – as required by law in the event of an investigation

### **National Pupil Database**

Much of the data about pupils in England goes on to be held in the NPD.

The NPD is owned and managed by the DfE and contains information about pupils in schools in England – it provides evidence on educational performance to inform independent research as well as studies commissioned by the DfE. Information on the NPD is held in an electronic format for statistical purposes and it is securely collected from a range of sources, including schools, LAs and awarding bodies. You can find out more about the NPD by following this link:

<https://www.gov.uk/guidance/how-to-access-department-for-education-dfe-data-extracts>.

### **Sharing by the DfE**

The DfE is legally allowed to share pupils' personal information with certain third parties, including the following:

- Schools
- LAs
- Researchers
- Organisations connected with promoting the education or wellbeing of children in England
- Other government departments and agencies
- Organisations fighting or identifying crime

Organisations fighting or identifying crime, such as the Home Office and the police, may use their legal powers to contact the DfE to request access to individual level information relating to a crime.

For more information about how the DfE collects and shares pupil information, you can look at the information in the following two links:

- <https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>
- <https://www.gov.uk/government/publications/dfe-external-data-shares>

### **How to find out what personal information the DfE holds about you**

Under the Data Protection Act 2018, you are entitled to ask the DfE what personal information it holds about you. You have the right to ask the DfE:

- If it processes your personal data.
- For a description of the data it holds about you.
- The reasons it is holding your data and any recipient it may be disclosed to.
- For a copy of your personal data and any details of its source.

To exercise these rights, you should make a subject access request. Information on how to do this can be found by following this link:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

You can also contact the DfE directly using its online contact form by following this link: <https://www.gov.uk/contact-dfe>.

### **Youth support services**

Once you reach the age of 13, we are legally required to pass on certain information about you to Hartlepool Borough Council Youth Services, as it has legal responsibilities regarding the education or training of 13-19 year-olds.

This information enables it to provide youth support services, post-16 education and training services, and careers advice.

Your parent/carer, or you once you're 16, can contact our data protection officer to ask us to only pass your name, address and date of birth to Hartlepool Borough Council Youth Services.

Data is securely transferred to the youth support services via AnyComms.

For more information regarding services for young people please visit our Local Authority's website: [https://www.hartlepool.gov.uk/info/20078/children\\_and\\_families](https://www.hartlepool.gov.uk/info/20078/children_and_families)

We will not share any information about you outside the school without your consent unless we have a lawful basis for doing so. For example, we may also share your data with classroom/teaching apps and some website for the purpose of enhancing pupil learning. Where we do this we will rely on either Article 6(e) (public task) or Article 6(a) (consent).

**Where we rely on Article 6(e) you have the right to object to processing and where we are relying on Article 6(a) you have the right to withdraw that consent at any time. Please see section below on data subject rights.**

### **Transferring data internationally**

Where we share data with an organisation that is based outside the European Economic Area, we will protect your data by following data protection law.

### **How long do we keep your personal data for?**

Hartlepool Aspire Trust will keep your data in line with our Data Retention and Disposal Policy.

Most of the information we process about you will be retained as determined by statutory obligations. Any personal information which we are not required by law to retain will only be kept for as long as is necessary to fulfil our organisational needs.

### **What rights do you have over your data?**

Under the UK GDPR pupils have the following rights in relation to the processing of their personal data:

- Request access to the information the school holds about you.
- Restrict our processing of your personal data, i.e. permitting its storage but no further processing.
- Object to direct marketing (including profiling) and processing for the purposes of scientific and/or historical research and statistics.
- Have your personal data rectified if it is inaccurate or incomplete.
- Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.
- Request the deletion or removal of personal data where there is no compelling reason for the continued processing.

### **How to access personal data we hold about you**

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent. However, there is no automatic parental right of access to the educational record of your child.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

Individuals 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.

## **Complaints**

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact our DPO on the address provided above.

If we cannot resolve your concerns, you may also complain to the Information Commissioner's Office (the Data Protection Regulator) about the way in which the school/college has handled your personal data. You can do so by contacting:

First Contact Team Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF <a href="mailto:icocasework@ico.org.uk">icocasework@ico.org.uk</a> // 0303 123 1113
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## **Last updated**

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated on 31<sup>st</sup> March 2022.