Privacy Notice – eMonitoring – Pupils & Learners

This privacy notice has been written to inform members of the public, parents and pupils, about how and why we process pupil data in relation to eMonitoring.

Who are we?

Hartlepool Aspire Trust (aka Catcote Academy) and Catcote Futures are separate data controllers as defined by the UK GDPR. This means that they each determine the purposes for which your personal data is processed and how it is processed. They will only collect and use your personal data in ways that are compliant with data protection legislation.

We have appointed Veritau Ltd as our Data Protection Officer (DPO). The role of the DPO is to monitor our compliance with the UK GDPR and the Data Protection Act 2018 and advise on data protection issues. If you would like to discuss this privacy notice or our use of your data, please contact Louise Robson, Head of Corporate Services on 01429 264036, or Veritau.

Veritau's contact details are:

Schools Data Protection Officer
Veritau Ltd
West Offices
Station Rise
York
Y01 6GA
schoolsDPO@veritau.co.uk

01904 554025

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

What emonitoring software do we use?

The trust uses Smoothwall emonitoring software. A copy of Smoothwall's Privacy Notice can be accessed via this link: https://qoria.com/privacy

What information do we collect and why do we collect it?

By using Smoothwall emonitoring systems the trust collects, stores, and uses the following information to identify you and the information you have accessed:

a. Username
b. Computer
c. Time
d. Reason for the capture of information

e. Attachments of relevant screenshots

The trust operates emonitoring software for the following purposes:

- Safeguarding

Our lawful basis for processing your personal data is Article 6(1)(c) and 9 (2)(b) respectively:

6 (1) (c) Legal Obligation The system facilitates the e-monitoring of students IT usage which allows for the effective safeguarding of students. This supports students by ensuring their wellbeing in protecting them against harmful online content and alerting the school to any potential safeguarding risks as evidenced by the individual's internet usage. This is in line with the duty of care that the school are responsible for providing as set out in the Education Act 2002.

Department for Education's statutory guidance 'Keeping Children Safe in Education' obliges schools and colleges in England to "ensure appropriate filters and appropriate monitoring systems are in place. Children should not be able to access harmful or inappropriate material from the school or colleges IT system" however, schools will need to "be careful that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding."
Schools (and registered childcare providers) in England and Wales are required "to ensure children are safe from terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of filtering" (Revised Prevent Duty Guidance: for England and Wales, 2015).

9 (2)(b) – processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection.

Who has access to your personal data?

Your information will only be made available to trust employees where there is a need to investigate the report. Only employees authorised by trust management may have access to this information.

Who do we share your personal data with?

We will only share captured information with other agencies where there is a lawful reason to do so - for example to share with the police for the purposes of crime prevention.

How long do we keep your personal data for?

Information which does not meet the trust threshold will be retained for 90 days.

Information which meets the trust threshold will be retained until the student is 25 years old.

Artificial intelligence (AI)

We may use some systems and platforms that incorporate an AI function. Where we do this, we ensure that the data is held securely and is not used for training the AI model.

AI does not make any automated decisions about individuals, and outputs are always subject to human oversight.

International transfers of data

Although we are based in the UK, some of the digital information we hold may be stored on computer servers located outside the UK. Some of the IT applications we use may also transfer data outside the UK.

Usually, your information will not be transferred outside the European Economic Area, which is deemed to have adequate data protection standards by the UK government. If your information is transferred outside the EEA, we will take reasonable steps to ensure your data is protected and appropriate safeguards are in place.

What rights do you have over your data?

Under the UK GDPR, you have the following rights concerning the processing of your data:

- to be informed about how we process your personal data. This notice fulfils this obligation.
- to request a copy of the personal data we hold about you.
- to request that your personal data be amended if it is inaccurate or incomplete.
- to request that your personal data be erased where there is no compelling reason for its continued processing.
- to request that the processing of your personal data be restricted.
- to object to your personal data being processed.

Usually, pupils are considered to have the mental capacity to understand their own data protection rights from the age of 12 years old. We may therefore consult with a pupil over this age if we receive a request to exercise a data protection right from a parent.

If you have any concerns about the way we have handled your personal data, you can submit a data protection complaint to us. Please contact us on the details above outlining your concerns.

If we cannot resolve your concerns, then you may also complain to the Information Commission, which is the UK's data protection regulator. Its contact details are below:

The telephone helpline (0303 123 1113) is open Monday to Friday between 9 a.m. and 5 p.m. (excluding bank holidays). Alternative methods to report, enquire, register, and raise complaints are available on the ICO's website here.

Changes to this notice

We reserve the right to change this privacy notice at any time. We will typically notify you of changes that affect you. However, please check regularly to ensure you have the latest version.

This privacy notice was last reviewed 24/08/2026.