Privacy Notice for Parents & Carers
Including use of your child's personal data

Contents

1. Introduction 1
2. The personal data we hold 1
3. Why we use this data 2
4. Our lawful basis for using this data 4
5. Collecting this data 5
6. How we store this data 5
7. Who we share data with 5
8. Your rights 7
9. Complaints 8
10. Contact us 9

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1. Introduction

Under UK data protection law, individuals have a right to be informed about how our school, and the multi-academy trust (MAT) we are part of, 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 covers how we process personal data about parents and carers of pupils and pupils at our school.

Where content relates to pupils, it applies while we consider that your child is not capable of understanding or exercising their own data protection rights.

Once your child is able to understand their rights in relation to their personal data (generally considered to be around age 12, but assessed on a case-by-case basis), you should instead refer to the pupil privacy notice available on The Propeller Academy Trust website. The Propeller Academy Trust - GDPR.

Our trust, The Propeller Academy Trust, Fitzwaryn School, Denchworth Road, Wantage, OX12 9ET, is the 'data controller' for the purposes of UK data protection law.

2. The personal data we hold

Parents and carers
Personal data that we collect, use, store and share (where appropriate) about you includes, but is not restricted to:

- Contact details and contact preferences (such as name, address, email address, telephone numbers)
- Bank details
- Details of your family circumstances
- Details of any safeguarding information including court orders or professional

involvement
- Records of your correspondence and contact with us
- Details of any complaints you have made

We may also collect, use, store and share (where appropriate) information about you that falls into 'special categories' of more sensitive data. This includes but is not restricted to:
- Photographs and CCTV images captured in school

Pupils

We hold personal data about pupils at our school to support teaching and learning, to provide pastoral care and to assess how the school is performing.

Personal data we may collect, use, store, and share (where appropriate) about your child includes but is not restricted to:
- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and external tests
- Pupil and curricular records
- Exclusion information
- Attendance information
- Information about their use of information and communication systems, equipment and facilities (e.g. school computers)

We may also collect, use, store and share (where appropriate) information about your child that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:
- Information about any medical conditions that we need to be aware of, including physical and mental health
- Photographs and CCTV images captured in school
- Information about characteristics, such as ethnic background or special educational needs (SEN)
- Safeguarding information
- Details of any support received, including care packages, plans and support providers

We may also hold data about your child that we have received from other organisations, including other schools or trusts, other agencies and local authorities.

3. Why we use this data

We will only use your/your child's personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your/your child's personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Parents and carers

We collect and use the data listed in section 2 above to:
a) Report to you on your child's attainment and progress
b) Keep you informed about the running of the school (such as emergency closures) and events

c) Process payments for school services and clubs
d) Provide appropriate pastoral care
e) Protect pupil welfare
f) Administer admissions waiting lists
g) Assess the quality of our services
h) Carry out research
i) Comply with our legal and statutory obligations

Pupils
We collect and use the data listed in section 2 above to:

a) Support pupil learning
b) Monitor and report on pupil progress
c) Provide appropriate pastoral care
d) Protect pupil welfare
e) Assess the quality of our services
f) Carry out research
g) Administer school property
h) Comply with the law regarding data sharing
i) Ensure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally, and safely
j) Get in touch with you and your pupil
k) Answer questions and complaints
l) Publishing statistics, for example, about the number of pupils or learners in schools

3.1 Use of personal data for marketing purposes

We do not currently process personal data of parents and carers or pupils for marketing purposes. If this changes in the future, we will amend the relevant privacy notices to explain the processing to you including your right to object to it.

3.2 Use of personal data in automated decision-making and profiling

We do not currently process personal data of parents and carers or pupils through automated decision-making or profiling. This means we don't make decisions about you/your child using only computers without any human involvement.

If this changes in the future, we will amend the relevant privacy notices to explain the processing to you, including your right to object to it.

3.3 Use of personal data for filtering and monitoring purposes

Parents and carers
Parents and carers do not have access to the school's on-site information and communication systems or hardware; therefore, personal data is not subject to on-site filtering and monitoring.

Pupils
While your child is in our school, we may monitor their use of our information and communication systems, equipment and facilities (i.e. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations
- Comply with our policies i.e. child protection policy, IT acceptable use policy and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)
- Protect your child's welfare

4. Our lawful basis for using this data

Parents and carers
Our lawful basis for processing your personal data for the purposes listed in section 3 above are as follows:

- For the purposes of a), b), d), f), in accordance with the 'public interest task' basis – we need to process data to fulfil our statutory function as a school
- For the purpose of i), e), in accordance with the 'legal obligation' basis – we need to process data to meet our responsibilities under law
- For the purposes of c), g), h), in accordance with the 'legitimate interest' – where there's minimal privacy impact and we have a compelling reason

Pupils
Our lawful basis for processing your child's personal data listed in section 3 above as follows:

- For the purposes of a), b), c), d), e), j), l), in accordance with the 'public interest task' basis – we need to process data to fulfil our statutory function as a school
- For the purposes of d), h), k), in accordance with the 'legal obligation' basis – we need to process data to meet our responsibilities under law
- For the purposes of f), g), i) in accordance with the 'legitimate interest' basis – where there's a minimal privacy impact and we have a compelling reason

4.1 Our basis for using special category data

For 'special category' data, we will only collect and use it when we have both a lawful basis, as set out above and 1 of the following conditions as set out in the UK data protection law:

- We have obtained your explicit consent to use your/your child's personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your/your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition of processing as set out in the UK data protection law. Conditions include:

- We have obtained consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your/your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data is concerned has already been made manifestly public by you

- We need to process it for, or in connection with, legal proceedings, to obtain legal advice or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

5. Collecting this data

We will only collect and use your/your child's data when the law allows us to (as detailed above in section 4). While the majority of this information we collect about you/your child is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect this information, we will make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data that we hold about you/your child will come from you, but we may also hold data about you/your child from:

- Local authorities
- Government departments or agencies
- Police forces or trusts
- Department for Education (DfE)

6. How we store this data

We keep personal information about you/your child while your child is attending our school. We may also keep it beyond their attendance at our school if this is necessary to comply with our legal obligations or meet our regulatory requirements. Our data retention schedule sets out how long we keep information about parents and carers and pupils. Please contact us ('see Contact us ' below) for a copy of the retention schedule.

We have put in place appropriate security measures to prevent your/your child's personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your/your child's personal data securely when we no longer have a legal requirement to retain it.

7. Who we share data with

We do not share information about you with any third party without consent unless the law and our policies allow us to do so.
Where it is legally required, or necessary (and it complies with UK data protection law), we may share personal information about you/your child with:

- Schools that your child may attend after leaving us
- Our local authorities, which include Oxfordshire and Bracknell Forest – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions
- Government departments or agencies
- Department for Education (DfE)
- Youth support services providers
- Our regulator, Ofsted
- Suppliers and service providers:
    - Catering
    - Filtering and monitoring

    - MIS providers
    - MIS connection tools
- Financial organisations
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts or tribunals

7.1 Sharing data with the Department for Education (DfE)

The DfE (a government department) collects personal data from schools and local authorities via various statutory data collections. We are required to share information about our pupils with the DfE either directly or via our local authority, via various statutory data collections.

The data shared will be in line with the following relevant legislation:

- Regulation 5 of The Education (Information About individual Pupils) (England) Regulations 2013
- Section 29(3) of the Education Act 1996

The data is transferred securely and held by the DfE under a combination of software and hardware controls that meet the current government security policy framework.

The data we share with the DfE is used for a number of purposes, including to:

- Inform funding
- Monitor education policy and school accountability
- Support research
- The information shared with the DfE could include:
- Your child's name and address
- Unique pupil numbers
- Pupil matching reference numbers
- Gender and ethnicity
- Details of any special educational needs (SEN)
- Details of schools attended
- Absence and exclusion information
- Information relating to exam results
- Information relating to any contact with children's services
- What they did after they finished school

Please note: this list is not exhaustive.

Once your child reaches the age of 13, we are legally required to pass on certain information to the local authority or youth service provider, which has responsibility regarding the education or training of 13 to 19 year olds under section 507B of the Education Act 1996.

Parents and carers, or pupils if aged 16 or over, can request that only their name, address and date of birth be passed to agencies by informing the data protection lead (‘see Contact us ’ below).

National Pupil Database
We are required to provide information about pupils to the DfE as part of the statutory data collections such as the school census.

Some of the information is then stored in the National Pupil Database (NPD), which is owned and managed by the DfE and provides evidence on school performance to inform research.

The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The DfE may share information from the NPD with third parties, such as other organisations that promote children's education or wellbeing in England. These third parties must agree to strict terms and conditions about how they use data.

For more information, see the DfE's webpage on how it collects and shares personal data. You can also contact the DfE with any further questions about the NPD.

7.2 Transferring data internationally

We may share personal information about you/your child with international third parties, where different data protection legislation applies.

Where we transfer your/your child's personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to setup safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us (see 'Contact us' below).

8. Your rights

8.1 How to access personal information that we hold about you/your child

You have a right to make a 'subject access request' to gain access to personal information that we hold about you/your child.

If you make a subject access request, and we do hold the information about you/your child, we will (subject to any exemptions that apply):

- Give you a description of it
- Tell you why we are holding it, how we are processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- 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

You may also have the right for your/your child's personal information to be transmitted electronically to another organisation in certain circumstances.

Once your child is able to understand their rights over their data (generally considered to be age 12, but this has to be considered on a case by case basis), we will need to obtain

consent from your child for you to make a subject access request on their behalf.
If you would like to make a request, please contact us (see 'Contact us' below).

8.2 Your other rights regarding your child's data

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your/your child's personal data
- Object to processing of personal data that is likely to cause, or is causing harm, damage or distress
- In certain circumstances, have inaccurate personal data corrected or blocked
- In certain circumstance, have the personal data about you/your child deleted or destroyed, or restrict its processing
- Withdraw consent, where previously provided it for the collection, processing and transfer of your/your child's personal data for a specific purpose
- In certain circumstances be notified of a breach
- Make a complaint to the Information Commissioners Office (ICO)
- Claim compensation for damages caused by a breach of the data protection regulations

We may refuse your information rights for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:

- Your right to have all personal data deleted or destroyed doesn't apply when the lawful basis for processing is legal obligation or public task
- Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task, or legitimate interests
- Right to object to use of your private data doesn't apply when the lawful basis for processing is contract, legal obligation or vital interest. And the lawful basis is consent, you don't have the right to object, but have the right to withdraw consent

See types of lawful basis in section 4 of this privacy notice.

To exercise any of these rights, please contact us (see 'Contact us' below).

9. Complaints

We are committed to upholding your data protection rights under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any concerns about our processing, we encourage you to let us know.

In compliance with our statutory duties under the Data (Use and Access) Act 2025, we have established a formal process for handling data protection complaints.

You can submit a complaint in any of the following ways:

- Online: Complete and submit the online form
- Email: Send the details of your concern to dpl@propellertrust.org
- Post: Write to our Data Protection Lead, at The Propeller Academy Trust, The Lambourn, Wyndyke Furlon, OX14 1UJ
- Verbally: You can raise a verbal complaint with a member of our staff who will ensure that it is logged formally

We will acknowledge your complaint within 30 days of receipt and keep you updated on

our investigation progress.

If you are not satisfied with our final response, you have the right to escalate your complaint to the Information Commissioners Office (ICO). You can find out more information about this on the ICO's website https://ico.org.uk/make-a-complaint/.

10. Contact us

If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact our **Data Protection Lead (DPL)** on dpl@propellertrust.org.