Privacy Notice for Pupils

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1. Introduction

You have a legal right to be informed about how our school, and the multi-academy trust (MAT) we are part of, uses any personal information that we hold about you. To comply with this, we provide a 'privacy notice' to you where we are processing your personal data.

This notice explains how we collect, store and use personal data about **pupils at our school**, like you.

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

Personal information that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Your name
- Your contact details
- Your test results, details about your learning and what you have achieved at school
- Your attendance records
- Details of any behaviour issues or exclusions
- Information about how you use our information and communication systems, equipment and facilities (e.g. school computers)

We may also collect, use, store and share (when appropriate) information about you that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Information about your characteristics, like your ethnic background or any special educational needs (SEN)
- Information about any medical conditions you have
- Photographs and CCTV images
- Safeguarding information

- Details of any support received, including care packages, plans and support

We may also hold data about you that we have received from other organisations, including other schools and local authorities.

3. Why we use this data

We collect and use the data listed above to help run the school, including to:

a) Get in touch with you and your parents/carers when we need to

b) Check how you're doing in exams and work out whether you or your teachers need any extra help

c) Track how well the school as a whole is performing

d) Look after your wellbeing and keep you safe

e) Make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely

f) Answer your questions and complaints

g) Publish statistics, for example, about the number of pupils or learners in schools

h) Meet legal requirements placed upon us

i) Carry out research for legitimate interests

j) Administer school property

We will only use your personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for any other reason and that reason is incompatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis that 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.

3.1 Use of your personal data for marketing purposes

The Trust does not generally use pupils' personal data for direct marketing purposes. From time to time, however, photographs or videos of pupils may be used in the Trust's promotional or marketing materials, but only where the appropriate consent for photography and publication has been obtained and recorded in accordance with the Trust's procedures. If the Trust's marketing activities change in the future, this privacy notice will be updated to explain the processing and any rights available to you, including the right to object where applicable.

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

We don't currently put any pupils' personal information through any automated decision-making or profiling process. This means we don't make decisions about you using only computers without any human involvement.

If this changes in the future, we will update this notice to explain the processing to you, including your right to object to it.

3.3 Use of your personal data for filtering and monitoring purposes

While you're in our school, we may monitor your use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations
- Comply with our policies (e.g. 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 welfare

4. Our lawful basis for using this data

We will only collect and use your information when the law allows us to. We need to establish a 'lawful basis' to do this.

Our lawful bases for processing your personal data for the purposes listed in section 3 above are as follows:

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

Where you've given us your consent to use your information, you may take back this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you want to.

4.1 Our basis for using special category data

For 'special category' data (more sensitive personal information), we only collect and use it when we have both a lawful basis, as set out above, and 1 of the following conditions for processing as set out in UK data protection law:

- We have got your explicit consent to use your information in a certain way
- We need to use your information under employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The information has already been made obviously public by you
- We need to use it to make or defend against legal claims
- We need to use it for reasons of substantial public interest as defined in legislation
- We need to use it for health or social care purposes, and it's used by, or under the direction of, a professional obliged to confidentiality under law
- We need to use it for public health reasons, and it's used by, or under the direction of, a professional obliged to confidentiality under law
- We need to use it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the use is 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 for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your 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 obviously public by you
- We need to use it as part of legal proceedings, to obtain legal advice, or to make or defend against legal claims

- We need to use it for reasons of substantial public interest as defined in legislation

5. Collecting this data

We will only collect and use personal information when the law allows us to as detailed above in section 4 of this notice. While most of the information we collect about you is mandatory (i.e. you have to give us the information), there is some information that can be provided voluntarily.

Whenever we want to collect information from you, we make it clear whether you have to give us this information (and if so, what the possible consequences are of not doing that), or whether you have a choice.

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

- Local authorities
- Government departments or agencies
- Police forces, courts or tribunals
- Other schools or trusts
- The Department for Education (DfE)

6. How we store this data

We keep personal information about you while you're attending our school. We may also keep it after you stop attending our school if this is necessary to comply with our legal obligations or to meet our regulatory requirements. Our record retention schedule sets out how long we keep information about pupils The Propeller Academy Trust - GDPR.

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

We will dispose of your 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 with:

- Schools that you 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
- Youth support services provider
- Department for Education
- 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)

We have to share information about you with the Department for Education either directly or via our local authority, via various statutory data collections.

The data shared will be in line with the following 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 Department for Education under a combination of software and hardware controls that meet the current government security policy framework.

The data we share about you with the Department for Education is used for a number of different 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 or 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 pupils in our school reach the age of 13, we are legally required to pass on certain information to the local authority or youth services provider, which has responsibilities regarding the education or training of 13- to 19-year-olds under section 507B of the Education Act 1996. Parents/carers, or pupils if aged 16 or over, can request that only their name, address and date of birth be passed to these agencies by informing the data protection officer (DPO).

National Pupil Database

We have to provide information about you to the Department for Education as part of data collections such as the school census.

Some of this information is then stored in the National Pupil Database (NPD), which is managed by the Department for Education and provides evidence on how schools are performing. This, in turn, supports research.

The database is held electronically so it can be turned into statistics. The information it holds is collected securely from schools, local authorities and exam boards and others.

The Department for Education may share information from database with other organisations, such as organisations that promote children's education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data.

You can find more information about this on the Department for Education's webpage on how it collects and shares personal data.

You can also contact the Department for Education if you have any questions about the database.

7.2 Transferring data internationally

We may share personal information about you with international third parties, where different data protection legislation applies:

Where we transfer 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 set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

8. Your rights

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

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

If you make a subject access request, and if we do hold information about you, we will (unless there's a really good reason why we shouldn't):

- Give you a description of it
- Tell you why we are holding it, how we are using 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 (decisions made by a computer or machine, rather than by a person), and any consequences of this
- Give you a copy of the information in an understandable form

You may also have the right for your personal information to be shared with another organisation in certain circumstances.

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

- Say that you don't want your personal information to be used

- Object to the processing of personal data that is likely to cause, or is causing, damage or distress
- Stop it being used to send you marketing materials
- Say that you don't want it to be used for automated decisions (decisions made by a computer or machine, rather than by a person)
- In some cases, have it corrected if it's inaccurate
- In some cases, have it deleted or destroyed, or restrict its use
- Withdraw your consent, where you previously provided consent for your personal information to be collected, processed and transferred for a particular reason
- In some cases, be notified of a data breach
- Make a complaint to the Information Commissioner's Office (ICO) if you feel we have not used your information in the right way
- Claim compensation if the data protection rules are broken and this harms you in some way

We may refuse your information rights request 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 interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent

See information on 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 other concerns about our data 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 compliant 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 Officer. 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.