

PRIVACY NOTICE: STUDENTS AND PARENTS

Changing Lives Learning Trust is the data controller as defined by Article 4 (7) of the UK GDPR for the use of personal data explained in this Privacy Notice.

The categories of student information that we process include:

- personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- characteristics (such as ethnicity, language, and free school meal eligibility)
- image and voice recordings for assessment, celebration, and CCTV images for safety and security reasons.
- safeguarding information (such as court orders and professional involvement)
- special educational needs (including the needs and ranking)
- medical and administration (such as doctors' information, child health, dental health, allergies, medication and dietary requirements)
- Biometric data.
- Family financial information (such as entitlement to meals, transport, and premium funding to manage catering, school trips etc.)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (such as phonics results, post 16 courses enrolled for and any relevant results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)

Why we collect and use this information

The personal data we collect is essential for the trust to fulfil official functions and meet legal requirements and we use it to:

- a) to support learning
- b) to monitor and report on student attainment progress
- c) to provide appropriate pastoral care
- d) to assess the quality of our services
- e) to keep children safe (food allergies, emergency contact details, child protection, CCTV)
- f) to confirm the identity of prospective students and their parents
- g) to meet the statutory duties placed on us for the Department for Education (DfE) data collections:
- h) to make use of photographic images of students in publications and the Trust's websites:
- i) to meet the statutory duty placed upon us to report infectious diseases;
- j) to receive reports from any external bodies who may be working with a student;
- k) to record our own school history.

Under the UK General Data Protection Regulation (UKGDPR) the lawful bases we rely on for processing personal student information are:

| 0(1)(0) | to ponorm a taok carnoa cut in the public interest. |
|---------|--|
| 6(1)(b) | to enter into or carry out a contract e.g., to provide safe meals, trips, transport, |
| | uniform, professional photos, childcare. |
| 6(1)(c) | to comply with the law e.g., recording attendance, publishing results, recording |

to perform a task carried out in the public interest.

the census (see Sharing with the DfE below), data sharing with child protection partners like social care, the NHS, and the Local Authority etc.

6(1)(a) having your consent e.g., to use images and names publicly, or use biometric data as an identifier.

When we process sensitive personal information like medical data we rely on the lawful bases:

| 9(2)(h) | to prevent medical problems, assess needs, and to support health & social care services e.g. Education Health & Care Plans (EHCP), records of medicine administration. |
|---------|--|
| 9(2)(i) | to improve public health e.g. we are required to report infections, like meningitis |
| | or e-Coli, to local and national government departments; |
| 9(2)(f) | to make or defend legal claims e.g., some special educational needs and all accident records etc. |

This list is not exhaustive. For more information about the categories of information we process and why please see the Trust's Data Protection policy.

Collecting student data

Much of the information we process will be obtained directly from you (students and parents). We collect student information via admission forms at joining the Trust and refresh information (including by electronic means) throughout the time at the Trust and via Common Transfer File (CTF) or secure file transfer from previous schools, local authorities and/or Department for Education (DfE).

Student data is essential for the schools' operational use. Whilst the majority of student information you provide to us is mandatory, some of it requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain student information to us or if you have a choice in this.

Storing student data

We hold student data securely in line with the Information and Records Management Society (IRMS) Records Management Toolkit for Schools. This personal data is retained for a wide range of time periods from days after a successful trip for the consent form to many years after a student has left us for an accident report. For more information about how long we keep some information for and why (data retention), and how we keep the data safe, please see the trust's Data Protection Policy and Records Management Policy.

Who we share student information with

We routinely share student information with:

6(1)(e)

- Other schools within Changing Lives Learning Trust
- Educational institutions that students attend after leaving us

- Child development and protection partners like our Local Authority Children's Services, Public Health, Inclusion & Social Care.
- The Department for Education (DfE)
- Our Local Authority
- Medical services like therapists, the NHS and the local immunisation team and Public Health England.
- Government departments like Public Health England, Local Authority Public Health, and District Council Environmental Health Departments.
- Voluntary and charitable organisations (with your permission only), such as Barnardo's, our local Foodbank and similar organisations.
- Exam boards

We also share personal data with third party organisations that provide services to us. This data is shared, only where it is essential for the service to be provided. (This list is not exhaustive).

- Accelerated Reader (reading skills programme)
- Applicaa (online admission tool)
- BounceTogether (mental health survey tool)
- Class Charts (classroom management and parental engagement software)
- Class Dojo (collaboration tool to support social-emotional learning and gives pupils a voice of their own with Portfolios)
- CPOMs (safeguarding management tool)
- Edulink (classroom management and parental engagement software)
- FFT Aspire (progress and attendance analysis tool)
- Google Workspace for Education (a suite of tools for classroom collaboration and productivity).
- Kym Allen (Health & Safety Consultants)
- Libresoft (Library software)
- Microsoft 365 OneDrive (Cloud Storage)
- MINTclass (a digital classroom seating planner and data presentation tool)
- Parentmail PMX (online communication tool and payment services)
- PIVATS (progress analysis tool)
- Scholarpack (MIS System)
- School Cloud (parents evening planning software)
- SIMS (MIS System)
- Tapestry (online journal to help record pupil's learning)
- Tempest (school photographer)
- Tucassi (online communication tool and payment service)
- Unifrog (careers and destinations platform)
- WONDE (Data sharing tool)

Sharing with Youth Support Services Students aged 13 +

Once our students reach the age of 13, we pass student information to our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide youth support services and careers advisers.

The information shared is limited to the child's name, address and date of birth. However, where a parent or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the child/student once they reach the age of 16.

Data is securely transferred to the youth support service via password protected email. For information on how data is stored by Inspira please read the privacy notice on their website at: Privacy Policy (inspira.org.uk)

Students aged 16+

We will also share certain information about students aged 16+ with our local authority and / or provider of youth support services because they have responsibilities in relation to the education or training of 13–19-year-olds under the same section 507B of the Education Act 1996.

This enables them to provide services as follows:

- post-16 education and training providers
- youth support services
- careers advisers

Data is securely transferred to the youth support service via password protected email. For information on how data is stored by Inspira please read the privacy notice on their website at: Privacy Policy (inspira.org.uk)

For more information about services for young people, please visit our local authority website.

Sharing with the Department for Education (DfE)

The DfE collects personal data from educational settings and local authorities via various statutory data collections. We are required to share this information about our students with them directly or via our local authority for the purpose of those data collections, under section 29(3) and section 537A of the Education Act 1996; under the Education (School Performance Information)(England) Regulations 2007; under regulations 5 and 8 of the School Information (England) Regulations 2008; under the Education (Pupil Registration) (England) Regulations 2006; under section 83 of the Children Act 1989 (for monitoring and research purposes); and for census purposes under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

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

For more information, please see 'How Government uses your data' section. For privacy information on the data the Department for Education collects and uses, please see: https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3

and

https://www.gov.uk/government/publications/privacy-information-key-stage-4-and-5-and-adult-education

Requesting access to your personal data

The UK-GDPR gives parents and students certain rights about how their information is collected and used. To make a request for your personal information, or be given access to your child's educational record, contact dataprotection@changinglives.education

You also have the following rights:

- the right to be informed about the collection and use of your personal data this is called 'right to be informed'.
- the right to ask us for copies of your personal information we have about you this is called 'right of access', this is also known as a subject access request (SAR), data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete this is called 'right to rectification'.
- the right to ask us to delete your personal information this is called 'right to erasure'
- the right to ask us to stop using your information this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to <u>complain to the Information Commissioner</u> if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at raise a concern with ICO.

For further information on how to request access to personal information held centrally by DfE, please see the 'How Government uses your data' section of this notice.

Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the DPO at dataprotection@changinglives.education.

Last updated

This privacy notice was compiled using <u>DfE advice and model documents</u>. We may need to review it periodically, so we recommend that you revisit this information from time to time. This version was last updated on the 19th May 2025

Contact

If you would like to discuss anything in this privacy notice, please contact:

Kathryn Lee - Data Protection Officer
Changing Lives Learning Trust
C/o West Lakes Academy
Main Street
Egremont, Cumbria
CA22 2DQ
dataprotection@changinglives.education

How Government uses your data

The student data that we lawfully share with the DfE through data collections:

- underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- informs 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Student Progress measures).
- supports 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school).

Data collection requirements

To find out more about the data collection requirements placed on us by the DfE (for example; via the school census) go to www.gov.uk/education/data-collection-and-censuses-for-schools.

The National Pupil Database (NPD)

The NPD is owned and managed by the Department for Education (DfE) and contains information about students in schools in England. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

The data in the NPD is provided as part of the operation of the education system and is used for research and statistical purposes to improve, and promote, the education and well-being of children in England.

The evidence and data provide DfE, education providers, Parliament and the wider public with a clear picture of how the education and children's services sectors are working in order to better target, and evaluate, policy interventions to help ensure all children are kept safe from harm and receive the best possible education.

To find out more about the NPD, go to <a href="https://www.gov.uk/government/publications/national-pupil-database-npd-privacy-notice/national-pupil-database-npd-privacy-national-pupil-database-npd-privacy-national-pupil-database-npd-privacy-national-pupil-database-npd-privacy-national-pupil-database-npd-privacy-national-pupil-database-npd-privacy-national-pupil-database-npd-privacy-national-pupil-database-npd-privacy-national-pupil-database-npd-privacy-national-pupil-database-npd-privacy-national-pupil-database-npd-privacy-national-pupil-database-npd-privacy-national-pupil-database-npd-privacy-national-pupil-database-npd-privacy-national-pupil-database-npd-privacy-national-pupil-database-npd-privacy-national-pupil-database-national-pupil-database-national-pupil-database-national-pupil-database-national-pupil-database-national-pupil-database-national-pupil-database-national-pupil-database-national-pupil-database-national-pupil-database-national-pupil-database-national-pupil-database-national-pupil-database-national-pupil-database-national-pup

Sharing by the DfE

DfE will only share students' personal data where it is lawful, secure and ethical to do so. Where these conditions are met, the law allows the Department for Education (DfE) to share students' personal data with certain third parties, including:

schools and local authorities

- researchers
- organisations connected with promoting the education or wellbeing of children in England
- other government departments and agencies
- organisations fighting or identifying crime

For more information about the Department for Education's (DfE) NPD data sharing process, please visit: https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

Organisations fighting or identifying crime may use their legal powers to contact the Department for Education (DfE) to request access to individual level information relevant to detecting that crime.

For information about which organisations the Department for Education (DfE) has provided student information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the Police please visit the following website: https://www.gov.uk/government/publications/dfe-external-data-shares

How to find out what personal information the Department for Education (DfE) holds about you

Under the terms of the UK GDPR, you are entitled to ask the Department for Education (DfE):

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department for Education (DfE), you should make a 'subject access request'. Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at the address below:

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

or

https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights

To contact the Department for Education (DfE): https://www.gov.uk/contact-dfe