



Privacy Notice for Parents and Pupils – How we use your information

2023/24

Who are we?

The Futures Trust is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

The Futures Trust is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: ZA154781.

You can contact The Futures Trust as the Data Controller in writing at: The Futures Trust, President Kennedy School, Rookery Lane, Coventry CV6 4GL or email enquiries@thefuturestrust.org.uk

What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our pupils and parents.

What is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information relates to personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

What personal information do we process about pupils and parents?

The pupil and parent information that we collect, hold and share includes:

- Personal information including a pupil's name, date of birth, unique pupil number and home address
- Characteristics such as ethnicity, language, and free school meal eligibility
- Attendance information such as sessions attended, number of absences and absence reasons.
- Educational information including records of work, assessment results, relevant medical information, details of pupils' special educational needs, exclusions/behavioural information, post-16 learning information.
- Contact information for parents, carers and other relatives, including telephone numbers, home addresses and e-mail addresses.
- Information about a child's home life, where required as part of necessary safeguarding and welfare processes.
- CCTV
- Photographs

Why do we use personal information?

We use pupil data:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing
- to safeguard pupils
- to share medical information with health professionals
- to celebrate pupil achievements
- to notify of behaviour issues
- administer admissions waiting lists

Collecting pupil information

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

What are the legal reasons for us to process your personal information?

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. The lawful reasons we have for processing personal information are as follows:

- Local Authority – to meet our legal obligation to share certain information with it such as safeguarding concerns and exclusions
- The Department for Education
- The pupil's family and representatives
- Educators and examining bodies
- Ofsted
- Suppliers and Service providers – to enable them to provide the service we have contracted them for
- Financial Organisations
- Central and Local Government
- Our Auditors
- Health Authorities
- Security organisations
- Health and Social Welfare Organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies

1) To comply with the law

We collect and use general purpose pupil information in order to meet certain legal requirements and legal obligations placed upon the Academy Trust by law. We therefore are required to process personal information for such purposes even if you have not consented to us doing so.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

If you would like a copy of or further information regarding the statutory authorities that underpin our legal obligations, you should contact the Academy Trust in writing.

2) To protect someone's vital interests

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

3) With the consent of the individual to whom that information 'belongs'

Whilst much of the personal information processed is in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

4) To perform a public task

It is a day-to-day function of the Academy Trust to ensure that children receive the education and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that pupils are properly educated and supported.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

Please be aware that an individual has the right to object to any processing where it is likely to cause or is causing harm or distress. To exercise this right, individuals should do so by contacting the school to inform them of their reasons for the objection. These reasons should relate to your specific circumstances. Upon receipt of an objection, the school will consider the reasons for the objection and balance this against the legitimate grounds to process data.

5) We have a legitimate interest

Occasionally we have reasons to process information which fall outside of our usual day-to-day school functions. Details of the type of processing that we may undertake on this basis are set out in Table 5.

Please be aware that an individual has the right to object to any processing where it is likely to cause or is causing harm or distress. To exercise this right, individuals should do so by contacting the school to inform them of their reasons for the objection. These reasons should relate to your specific circumstances. Upon receipt of an objection, the academy trust will consider the reasons for the objection and balance this against the legitimate grounds to process data.

Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

- 1) Explicit consent of the data subject
- 2) Processing relates to personal data which is manifestly made public by the data subject
- 3) Necessary for establishing, exercising or defending legal claims
- 4) Necessary for reasons of substantial public interest
- 5) Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
- 6) Necessary for archiving, historical research or statistical purposes in the public interest

The lawful reasons for each type of special category personal information data that we process is set out in the tables attached.

Who might we share your information with?

We routinely share pupil information with:

- Schools that the pupils attend after leaving us
- Local Authority – to meet our legal obligations to share certain information with it such as safeguarding concerns and exclusions
- The Department for Education (DfE)
- School nurse
- NHS
- Public Health and other public health agencies
- Central and Local Government
- Security organisations
- Professional advisers and consultants
- Charities and voluntary organisations • Police forces, courts, tribunals
- Professional bodies
- Pupil's family and representatives
- Educators and examining bodies
- Ofsted
- Coolmilk
- Catering Providers
- Other Schools in The Futures Trust
- Information Management software:
- Educational apps
- Conferencing software for home work and home learning
- HR and Payroll

Information Management software and Educational Apps are school specific so please see School Privacy Notices which can be found on each schools website:

- <https://www.barrshill.coventry.sch.uk/>
- <https://www.hajc.leics.sch.uk/>
- <https://www.keresleygrange.co.uk/>
- <https://www.knpa.co.uk/>
- <https://www.parkgate-coventry.org.uk>
- <https://www.pks.coventry.sch.uk/>
- <https://www.stokepark.coventry.sch.uk>

We do not share information about our pupils or parents unless the law and our policies allow us to do so.

Please refer to the tables for information about what personal information is shared with which specific third parties.

Data collection requirements:

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

What do we do with your information?

All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected The Academy Trust monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

NHS Test and Trace/Public Health Agencies:

It may be necessary for us to share limited information with the above agencies in the event that an individual tests positive for Coronavirus, or if there is a Coronavirus outbreak. This will enable the named agencies to liaise with families to provide advice and support, and to take appropriate steps in responding to an outbreak.

How long do we keep your information for?

In retaining personal information, the Academy Trust complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the Academy Trust are required to retain the information.

A copy of those schedules can be located using the following link:

<http://irms.org.uk/page/SchoolsToolkit>

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

What are your rights with respect of your personal information?

Under data protection law, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or to have access to your child's educational record, contact the school data protection contact or the School Data Protection Officer at Warwickshire Legal Services via email at schooldpo@warwickshire.gov.uk or alternatively;

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL

****Please ensure you specify which school your request relates to.**

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress; please note that this is not an absolute right and you will need to provide reasons for your objection.
- Rectify incorrect information
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

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 <https://ico.org.uk/concerns/>

Review

The content of this Privacy Notice will be reviewed September 2024

Table 1 – Personal information we are required to process to comply with the law:

Information Type	Relevant legislation	Special Category–additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Special Education Needs Report	Children's and Families Act 2014, section 69		Local Authority	Legal Obligation
Attendance register	Education (Pupil Registration)(England) Regulations 2006, Regulation 4, 10, 11 and 12		OFSTED, Local Authority	Legal Obligation
Common Transfer file	Education (Pupil Registration)(England) Regulations 2005, Regulation 6		School pupil transfers to	Legal Obligation
Safeguarding information	Education Act 2002, section 175 Children's Act 1989, Section 17, 47, 83. Children's Act 2004, Section 11		Local Authority	Legal Obligation
Admissions Register	Education (Pupil Registration)(England) Regulations 2006, Regulation 4, 10, 11, 14 and 15		OFSTED, Local Authority	Legal Obligation
Curricular Record including Assessment and achievement data	Education (Pupil Information) (England) Regulations 2005, Regulation 4		OFSTED, Local School. Local Authority	Legal Obligation
Educational Record	Education (Pupil Information) (England) Regulations 2005, Regulation 5 and 6		Parents, Local school	Legal Obligation
Pupil Information i.e name, age address, Emergency contact details	Education (Information About Individual Pupils) (England) Regulations 2013, Regulation 3 and 5		Department of Education – school census. Other schools – when pupils transfers	Legal Obligation
Medical / Dietary / allergies		Necessary for preventative or occupational medicine	Department of Education – school census. Other schools – when pupils transfers	Legal Obligation
School Census	Education Act 1996, Sections 537 & 537A, and accompanying regulations		Department of Education	Legal Obligation
Staff information, including	Education Act 2005, section 114		Secretary of State, Local Authority, Disclosure and	Legal Obligation

personal details, DBS check, qualifications			Barring Service,	
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Table 2 – Personal information we are required to process as it is necessary to protect someone's vital interests

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Medical Information	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent'	Medical staff i.e. paramedics/ambulance	Vital Interest
Religious belief	Children's and Families Act 2014, section 69 Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent'	Medical staff i.e. paramedics/ambulance	Vital Interest

Table 3 - Personal information we are required to process with the consent of the individual to whom that information 'belongs'

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Photographs Images		Government agencies, eg Department for Education, The Warwickshire Consortium Teaching School (led by the Nursery School)	Consent
Email address		Online payment and communication systems, education apps	Consent
Parent /Carer mobile telephone number		Online payment and communication systems, education apps	Consent
Childs Name, Date of Birth, Gender, Year group		Online payment and communication systems, education app	Consent
Parent name, date of birth, National Insurance number, 30 hours eligibility code (Nursery Children only)		Local Authority Synergy Data base (Nursery pupils only)	Consent

Table 4 - Personal information we are required to process because it is necessary to do so in order to perform a public task – please note that the right to object will apply to this processing, please see the section above that refers to ‘What are your rights with respect of your personal information?’

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Name		Public Health and other public health agencies	Public task
Date of Birth		Public Health and other public health agencies	Public task
Year Group		Public Health and other public health agencies	Public task
Parent contact number		Public Health and other public health agencies	Public task
Results of COVID-19 testing	Necessary for reasons of public health	Public Health and other public health agencies	Public task
Pupil Information i.e name, age address, Parent detail, Emergency contact details, registration group		Department of Education – school census. Other schools – when pupils transfers	Legal Obligation
Academic Progress data including Leuven data, welcome data, Learning journals, staff observations		OFSTED, Parents, Health such as Speech and Language	Public Task & Legal Obligation
Safeguarding information, Medical, Special Education Needs		Local Authority, Health, Parents	Legal Obligation
Educational and Safeguarding Information used internally for the purpose of educating and protecting the welfare of children		Internally within school	Legal Obligation
FSM entitlement		DfE, Local Authority	Legal Obligation Education Act 1996, section 512 – requirement to provide free school meals if the pupil is eligible

Table 5 - Personal information we process because we have a legitimate interest

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Images captured on our CCTV system	n/a	This is not shared routinely	n/a

