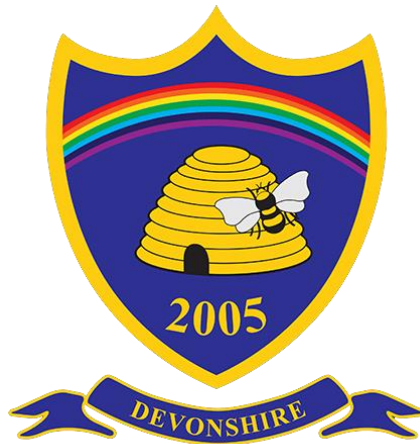




PRIVACY NOTICE



DEVONSHIRE PRIMARY ACADEMY

The Central Team and DPO will review this notice on a 2 yearly cycle

Colleagues affected by this Policy:	All stakeholders
Approved by/ date:	Sept 2023
Next review:	Sept 2025

GDPR

Devonshire Primary Academy ('the Academy') is required by law to collect and process personal data relating to all of its pupils. The Academy is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

This privacy notice provides you with information about how we collect and process personal data of our pupils and their parents/carers in accordance with the General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

Who are we?

Devonshire Primary Academy is part of The Sea View Trust – a multi-academy trust incorporating a number of different schools and academies. Our registered office address is Ewood Campus Clod Lane, Haslingden, Rossendale, England, BB4 6LR. We are registered with the Information Commissioner's Office (registration number ZA742257). This privacy notice has been issued on behalf of The Sea View Trust. When we refer to "we", "us", "our" or "the Academy" within this privacy notice, we are referring to Devonshire Primary Academy which is part of The Sea View Trust. The Sea View Trust is the 'data controller' for the purposes of data protection law.

The Sea View Trust has appointed a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

What data do we collect?

The Academy collects and processes a wide range of information about your child. This includes:

- Personal information such as their name, date of birth, unique pupil number and address;
- Characteristics such as their ethnicity, language, country of birth and free school meal eligibility;
- Attendance information such as the number of sessions they have attended, the number of absences and the reasons for those absences;
- Assessment information such as their current pupil progress, their predicted progress and where appropriate data relating to any assessments, tests or exams they have undertaken;
- Relevant medical information including any conditions or allergies your child may have, the need for epi-pens/medication, emergency contact and doctor's details;
- Special educational needs information. This includes information about any particular needs that your child has, any funding that is received specifically for your child and any statements of individual need;
- Behavioural information, which may include information about your child's general classroom behaviour including any awards gained, together with any detentions fixed-term or permanent exclusions they have received;
- Information relating to ethnicity, nationality and religion;
- Financial records about any money you have paid us; any amount(s) outstanding and associated recovery action. Depending on your chosen method of payment, we may hold your bank account details;
- Pastoral information, including notes on any home visits undertaken;

- Safeguarding information.
- Details of any other information that is provided to us by pupils and parents/carers whilst during the course of our relationship with you.
- Photographs.
- CCTV images.

Why do we collect and use this information?

We have set out below a description of all the ways we plan to use pupil and parent/carer information, and which of the legal bases we rely on to do so. We may process pupil and parent/carer information for more than one lawful ground depending on the specific purpose for which we are using your information.

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
To support pupil learning	Contact details and characteristics Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information	Necessary to comply with our legal obligations Necessary for the performance of a task carried out in the public interest
To monitor and report on pupil progress, enabling suitable interventions to be put in place where required	Contact details and characteristics Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information	Necessary to comply with our legal obligations Necessary for the performance of a task carried out in the public interest
To provide appropriate pastoral care and ensure your child has access to appropriate support	Contact details and characteristics Attendance information Assessment information Special educational needs information Behavioural information	Necessary to comply with our legal obligations Necessary for the performance of a task carried out in the public interest

	Pastoral and safeguarding information	
To assess the quality of our services	Contact details and characteristics Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information	Necessary to comply with our legal obligations Necessary for our legitimate interests to improve the Academy's performance
To keep pupils and staff safe	Contact details and characteristics Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information Photographs CCTV	Necessary to comply with our legal obligations Necessary for the performance of a task carried out in the public interest
To comply with the law regarding data sharing	Contact details and characteristics Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information	Necessary to comply with our legal obligations Necessary for the performance of a task carried out in the public interest
To comply with statutory duties placed upon us for Department for Education data collections	Contact details and characteristics Attendance information	Necessary to comply with our legal obligations Necessary for the performance of a task

	Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information	carried out in the public interest
To communicate with parents/carers and provide updates relating to pupil learning	Contact details and characteristics Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information Photographs	Necessary to comply with our legal obligations Necessary for our legitimate interests to improve the Trust's communications with parents/carers Consent
To process payments from parents/carers	Contact details and characteristics Financial information	Necessary for the performance of the contract

Purposes for processing – Special Category Data

We have set out below a description of all the ways we plan to use more sensitive “special category data” of pupils and parents/carers, and which of the legal bases we rely on to do so. We may process pupil and parent/carer information for more than one lawful ground depending on the specific purpose for which we are using your information.

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
To ensure your dietary needs are catered for	Medical information	Vital interests Necessary to comply with our legal obligations Schedule 1, Part 2, (6) Data Protection Act 2018 - Statutory Purposes
To make reasonable adjustments for the provision of learning	Medical information	Necessary to comply with our legal obligations Schedule 1, Part 2, (6) Data Protection Act 2018 - Statutory Purposes

For statistical analysis of our pupils	Race, nationality and ethnicity information	Necessary to comply with our legal obligations Schedule 1, Part 2, (6) Data Protection Act 2018 - Statutory Purposes
To keep pupils and staff safe	Medical information Behavioural information Pastoral and safeguarding information	Necessary to comply with our legal obligations Necessary for reasons of substantial public interest Schedule 1, Part 2, (18) Data Protection Act 2018 - Safeguarding children and adults at risk Schedule 1, Part 1, (3) Data Protection Act 2018 - Public Health
To support pupils with special educational needs	Special educational needs information Medical information	Necessary to comply with our legal obligations Necessary for reasons of substantial public interest Schedule 1, Part 2, (6) Data Protection Act 2018 - Statutory Purposes

Collecting Pupil and Parent/Carer Information:

Generally, the information we hold will have been provided by pupils and parents/carers (e.g. information inputted into our management information system or when we communicate with you), but we may also hold information provided by third parties where this is relevant to your own circumstances. Whilst the majority of the pupil and parent/carers information you provide to us is required by law, some of it is provided to us on a voluntary basis. In order to comply with the UK GDPR, when requesting information, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

Storing Pupil Data:

We hold pupil and parent/carers data for the duration your child is at the Academy. If/When your child transfers to an alternative school, their file will transfer with them; a copy will not be held in the Academy. If your child leaves Devonshire Primary Academy at the end of their school career, the files are stored in line with our Retention Policy.

Any information held by the Academy which does not form part of the school file will be kept for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of personal information are available upon request. After this period, we will securely destroy or anonymise personal information in accordance with data protection law

Who do we share information with?

We routinely share pupil and parent/caer information with:

- Schools that your child attends after leaving us
- Blackpool Local Authority
- The Department of Education
- Examining bodies
- Ofsted
- Law enforcement agencies
- Courts and tribunals
- Sea View Trust
- Our auditors, insurers and other professional advisers
- Health and social welfare organisations
- Devonshire Primary Academy works in partnership with the University of Cumbria, and Schools Direct and therefore student teachers working within the school will be working with and have access to pupil data. All student teachers work under the same policies as all other members of staff at Devonshire Primary Academy
- Our catering provider
- Our speech and language provider
- Other third parties we may engage the services of for the purpose of providing a public task or the administration of the Trust, for example our safeguarding monitoring software, our management information system provider.

Why do we share information?

We do not share information about our pupils or parents/carers with anyone without consent unless the law and our policies allow us to do so. We share pupils' data with the DfE on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring. We are required to share information about our pupils with the DfE under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013. To find out more about the data collection requirements placed on us by the Department for Education, for example the obligation on us to complete and return the school census, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

The National Pupil Database (NPD):

The NPD is owned and managed by the DfE and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the DfE. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

We are required by law to provide information about our pupils to the DfE as part of statutory collections such as the school census and early year's census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013. To find out more about NPS, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

The DfE share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- Conducting research or analysis
- Producing statistics

- Providing information, advice and guidance

The DfE has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- Who is requesting the data
- The purposes for which it is required
- The level and sensitivity of data requested; and
- The arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of data.

For more information about the DfE's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

Requesting Access to Your Personal Data:

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, please contact the Data Protection Officer by emailing dataprotectionofficer@forbessolicitors.co.uk

You also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- 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 data protection law.

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Where the processing of data is based on your consent you have the right to withdraw that consent at any time by notifying the Academy office in writing.

Contact

If you would like to discuss anything contained within the Privacy Notice, please email dataprotectionofficer@forbessolicitors.co.uk