

Pupil and Parent Privacy notice for HAM DINGLE PRIMARY Academy, a United Learning Trust Academy

This notice is intended to provide information about how the Academy will use or “process” personal data about individuals including current, past and prospective pupils (referred to in this notice as “pupils”) and their parents, carers or guardians (referred to in this notice as “parents”).

Responsibility for Data Protection

The Data Controller for personal information held by HAM DINGLE PRIMARY Academy is United Learning Trust (ULT). ULT is registered with the Information Commissioner’s Office (ICO). The registration number is Z7415170.

The Company Secretary is the Data Protection Officer (DPO) and is responsible for ensuring that ULT complies with the Data Protection Law. They can be contacted on company.secretary@unitedlearning.org.uk or 01832 864538.

Leonie Davies is responsible for ensuring that the Academy complies with ULT’s policies and procedures in relation to Data Protection. They can be contacted on 01384 900753.

Why we collect and use Personal Data about pupils and parents

HAM DINGLE PRIMARY Academy and United Learning Trust collect, create and hold personal information relating to our pupils and may also receive information about them from their previous school/Academy, local authority and/or the Department for Education (DfE). We also collect and hold personal information about our pupil’s parents and carers. We use this personal data to:

- Provide education services (including SEN), career services and extra-curricular activities to pupils; monitor pupils’ progress and educational needs;
- To safeguard pupils’ welfare and provide appropriate pastoral (and where necessary, medical) care.
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils at the Academy.
- To maintain relationships with alumni and the school community.
- For the purposes of management planning and forecasting, research and statistical analysis and to enable ULT to monitor the Academy’s performance.
- To monitor use of the Academy’s IT systems in accordance with the Academy’s Acceptable Use Policy.
- To receive information about current and prospective pupils from any educational institution that they attended.
- To confirm the identity of prospective pupils and their parents.
- To make use of images of pupils in print and digital communications, and for promotion and marketing, in accordance with the Academy’s/School’s policy on taking, storing and using images of children.
- To create invoices and process payments for services such as school meals, school trips etc.
- For security purposes, and for regulatory and legal purposes (for example child protection and health and safety) and to comply with its legal obligations.
- To receive reports from any organisation that may be working with your child.
- Where otherwise reasonably necessary for the Academy’s purposes, including to obtain appropriate professional advice and insurance for the Academy.
- To keep you updated about the activities of the Academy including by sending updates and newsletters by email and post.

- To organise trips and visits both in the UK and abroad.

The categories of personal data that we process

The types of personal data processed by the Academy include:

1. Names, addresses, telephone numbers, email addresses and other contact details.
2. Academic records and national curriculum assessment results, including examination scripts and marks.
3. Personal characteristics such as your ethnic group, religious beliefs, any special educational needs you may have and any relevant medical information.
4. Attendance information, behavioural records, any exclusion information.
5. Information provided by previous educational establishments and or other professionals or organisations working with pupils.
6. Where pupils go after they leave the Academy.
7. For pupils enrolling for post 14 qualifications, the Learning Records Service will give us the unique learner number (ULN) and may also give us details about your learning or qualifications.
8. Still and moving images, captured through video and photography and through the Academy's/School's CCTV system (in accordance with the Academy's/School's policy on taking, storing and using images of children).
9. Still and moving images in accordance with the Academy's image use policy .

The legal basis for the processing of pupil and parent data

The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller and where necessary to comply with our legal obligations.

Information relating to racial or ethnic origin, religious beliefs or health (point 3) will only be processed with the explicit consent of the pupil or the pupil's parents or when it is necessary for carrying out our legislative obligations. Further information regarding the purposes for which these data would be processed will be provided with the data collection form.

Data Retention Periods

The pupil's educational record will move with the pupil to their next school/Academy. Where the school/Academy is the last school that the pupil attends the records will be kept until the pupil is 25 years old.

Admissions information will be retained for one year post successful admission or closure of appeal.

Information relating to financial transactions will be kept for 7 years.

For further information on how long we keep personal data for please refer to our records retention schedule which can be found in the school office.

Data Security

ULT has in place technical and organisational measures that ensure a level of security appropriate to the sensitive nature of the personal data that we process. For further information regarding how we keep personal data secure please refer to our security of personal data policy.

Data Processors

We use third party data processors to provide us with a variety of services¹. This use of data processors will only take place if is in compliance with the UK GDPR and the Data Protection Act 2018 (and any subsequent legislation related to data protection in applicable jurisdictions).

Decisions on whether we contract with these third party processors are subject to a robust approval process and are based on a detailed assessment of the purpose for which the data processing is required, the level and sensitivity of data involved and the arrangements in place to store and handle the data. To be granted access to pupil level data, data processors must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and retention and use of the data.

We currently use the following data processors:

Arbor – School Management System	Pupil and Parent/carer contact details, pupil – attendance, medical, send, entitlement, assessment, enrolment. For further information please refer to Arbor’s website. The postal address is First Floor, Unit 16, The Westworks, White City Place, 195 Wood Lane, London, W12 7FQ
Relevant staff within the school	
Schools that the pupil’s attending after leaving us	Data will be transferred following the UL procedure for transferring data
Local Authority	Data will be transferred following the UL procedure for transferring data
Department for Education (DfE)	Data will be transferred following the UL procedure for transferring data
Health Services	Data will be transferred following the UL procedure for transferring data
E-safe monitoring service	The e-safe monitoring service uses the school ICT environment as a source of behaviour markers to provide early warning of safeguarding risk. The software installed on all school owned devices that use the school computer network. The school may choose to install this software on school owned portable devices. This software will continue to monitor activity on the device irrespective of locations. For further information, please refer to the e-safe education website. The postal address is Unit 22, Salford University Business Park, Leslie Hough Way, Salford, M6 6AJ
ParentMail – Ham Dingle are using legitimate interests as the lawful basis for processing information.	Pupil name, class and parent/carer contact details – this enables school to contact parents, parents can consent and pay for trips online, other online payments and refunds can be made. For further information, please refer to the ParentMail website. The postal address is ParentMail, Litton house, Saville Road, Peterborough, PE3 7PR.
Microsoft Online Services – Office 365	Is a cloud productivity suite free to establishments in UK education. It provides pupils, teachers and

¹ management information systems, accounts software, cloud storage services, applications and software for use in the classroom and to facilitate the secure transfer of data between the Academy and central office

	staff with enterprise grade communication and productivity services which include email, online documents editing and storage space. Please refer to the Microsoft website. The post address is Microsoft Ireland Operations Ltd, Attn. Data Protection, Carmenhall Road, Sandyford, Dublin, 18, Ireland.
RM Education/Unify – Ham Dingle are using legitimate interests as the lawful basis for processing information.	Online operating system to manage and access the school's online services. RM Unify enables users to access all teaching and learning resources from one online username and password. For further information, please refer to RM integris website. The postal address is 140 Eastern Avenue, Milton Park, Milton, Abington, Oxon, OX14 4SB
CPOMS – Safeguarding System Software	CPOMS is the market leading software application for monitoring child protection, safeguarding and a whole range of pastoral and welfare issues. For further information, please refer to the CPOMS website. The postal address is CPOMS Systems Ltd, Unit 7, Acorn Business Park, Skipton, North Yorkshire, BD23 2UE
2simple2build	A multi award winning app for gathering observations on the go. For further information please go to https://www.2simple.com/2buildaprofile
Medical Tracker	https://www.medicaltracker.co.uk/ used for recording incidents, communicating with parents, track medication expiry
Evolve	Online risk assessment tool for educational visits. For further information, please refer to the Evolve website. The postal address is 18 Deben Mill Business Centre, Old Maltings Approach, Woodbridge, Suffolk, IP12 1BL
Busy Thing - Ham Dingle are using legitimate interests as the lawful basis for processing information	A resource for schools with a comprehensive collection of interactive games, learning tools and powerful teaching resources to help teachers enrich the delivery of the primary curriculum. For further information, please contact Busythings, 3 St James Court, Friar Gate, Derby, DE1 1BT
Active Learn - Ham Dingle are using legitimate interests as the lawful basis for processing information.	A digital learning space for pupils and a toolkit for teachers, so that schools can search, plan, allocate and assess all in one place. For Further information, please refer to Active Learn website. The postal address is Wilkinson House, Jordan Hill, Oxford, OX2 8EJ
Maths Rock Stars (Maths Circle Ltd) Ham Dingle are using legitimate interests as the lawful basis for processing information.	Maths Rock Stars provides online activities and resources. The postal address is Maths Circle Ltd, Ossary Offices, Hazelwood Lane, Ampthill, MK45 2HF
Renaissance	Renaissance Place is a cloud-hosted platform that gives teachers instant access to pupil data. It is an online toolkit for children in Year 4, 5 and 6. The aim of the programme is to motivate children to read for pleasure. The postal address is 32

	Harbour Exchange Square, Tower Hamlets London, E14 9GE
Sumdog	Provides a wide variety of curricular activities and courses tailored to individual student abilities. The postal address is Sumdog Customer Services, 43 Queensferry Street, Edinburgh, EH2 4PF
Wonde - Ham Dingle are using legitimate interests as the lawful basis for processing information.	Wonde is a platform used to distribute free school meal vouchers. They have access to name, date of birth, UPN and FSM status. For further information, please refer to the Wonde website. The postal address is Furlong House, 2 Kings Court, Newmarket, CB8 7SG
Equin Limited - Insight - Ham Dingle are using legitimate interests as the lawful basis for processing information.	Insight Online pupil tracking is a software that enables Ham Dingle to track pupil progress. Please refer to Insight's website (www.insighttracking.com). Their address is Equin Limited, Unit 6482, PO Box 6945, London, W1A 6US
Third Space - Ham Dingle are using legitimate interests as the lawful basis for processing information.	Targeted maths intervention program software. For more information go to their website: www.thirdspacelearning.com . Their address is 68 Hanbury Street, London, E1 5JL
2Simple - Purple Mash - Ham Dingle are using legitimate interests as the lawful basis for processing information.	Software by 2Simple, Purple Mash is a cross curricular website for primary school children, enabling them to explore and enhance their knowledge. Cloud-based, it delivers curriculum focused activities, creative tools, programs and games.

[insert the names of all data processors who process parent or pupil data on the Academy's behalf for example Arbor, cloud storage providers, app providers, software providers such as Seneca Learning, Sparx Maths and data sharing tools such as Wonde]

Sharing Data with Third Parties (other data controllers)

We may share data with the following recipients:

Keeping in touch and supporting the School

We would like to share pupil and parent personal data with both our Parent Teacher Association and our Alumni Association. We will only do so if you have signed the appropriate consent form. Details of how these groups use your personal data are given on the consent form. Consent may be withdrawn at any time by writing to the Headteacher.

References

We will provide references to any other educational institution that the pupil proposes to attend and to potential employers of past and present pupils.

School Inspections

On request we will share academic records with inspectors from Ofsted.

Department for Education

We are required, by law, to pass some information about our pupils to the Department for Education (DfE). This information will, in turn, then be made available for use by the Local Authority.

DfE may also share pupil level personal data that we supply to them, with third parties. This will only take place where legislation allows it to do so and it is in compliance with the UK GDPR and the Data Protection Act 2018 (and any subsequent legislation related to data protection in applicable jurisdictions)..

Decisions on whether DfE releases this personal data to third parties are subject to a robust approval process and are based on a detailed assessment of who is requesting the data, the purpose 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 level data, requestors must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and retention and use of the data.

For more information on how this sharing process works, please visit:

<https://www.gov.uk/guidance/national-pupil-database-apply-for-a-data-extract>

For information on which third party organisations (and for which project) pupil level data has been provided to, please visit: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

If you need more information about how our local authority and/or DfE collect and use your information, please visit:

- our local authority at <https://www.dudley.gov.uk/council-community/data-protection-and-freedom-of-information/how-we-look-after-your-information/> or
- the DfE website at <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

We will not give information about our pupils to any other third parties without your consent unless the law and our policies allow us to do so.

Rights of the Data Subject

Data protection legislation gives individuals certain rights which are detailed below. If you wish to exercise these rights please contact Mrs Leonie Davies.

Right of access to personal data “subject access request”

You have the right to access the personal data that the Academy holds about you. Requests may be made in writing or orally (if requested orally we will make a record of that request to ensure it is met within the required timescale). Parents also have the right to request the personal data held about their children (If your child is over the age of 12 they will need to decide whether to consent to the request). We take the security of personal data seriously so we may ask you for proof of identity to verify that you are entitled to the information requested.

Right to withdraw consent

Where we have obtained your consent to specific processing activities you may withdraw this consent at any time.

Right to rectification

You have the right to have the personal data that we hold about you rectified if it is inaccurate or incomplete. We will respond to such requests within one month.

Right to erasure

You have the right to have personal data erased in certain specific circumstances. If you make such a request we will consider whether the right to erasure applies and give you a full and reasoned response.

Right to restrict processing

In certain circumstances you have the right to request that we restrict the processing of your personal data. If you make such a request we will consider whether the right to restrict processing applies and give you a full and reasoned response.

Further Information

For further information regarding your rights please refer to our rights of the data subject policy.

If you disagree with a decision that we have taken regarding the processing of your personal data please contact ULT's Company Secretary, Alison Hussain, on 01832 864538 or company.secretary@unitedlearning.org.uk.

You also have the right to lodge a complaint with the information Commissioners Office on 0303 123 1113 or <https://ico.org.uk/for-the-public/> .