

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

Who are we?

Grace Academy Darlaston, part of Tove Learning Trust is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Tove Learning Trust is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: Z7119841.

You can contact Grace Academy Darlaston as the Data Controller enquiries@darlaston.graceacademy.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, home address
 - 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.
 - Details of any support received, including care packages, plans, and support providers.
- We may also collect, use, store and share (when appropriate) information about your child that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:
- Any medical conditions we need to be aware of, including physical and mental health
 - Photographs and CCTV images captured in school
 - Characteristics, such as ethnic background or special educational needs

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 protect pupil welfare
- 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
- Administer admissions waiting lists
- Carry out research

Use of yours or your child's personal data for marketing purposes

Where you have given us consent to do so, we may send you or your child marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to them.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by contacting us (see 'Contact us' below).

Use of your child's personal data in automated decision making and profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

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 UK 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.

Most of the data we collect in relation to parents and pupils will come direct from the parent or pupil. However, we may also hold data relating to you and/or your child that has come from:

- Local authorities
- Government departments or agencies
- Police force, courts, tribunals
- External support services

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:

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 Grace Academy Darlaston 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.

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.

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

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 child's 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 manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

Who might we share your information with?

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- School nurse

- NHS
- Public Health and other public health agencies
- Information Management software: SIMS/Arbor, Synergy, Wonde
- Education/classroom apps
- Conferencing software for homework and home learning
- HR and Payroll
- Compass+ (The Careers and Enterprise Company)

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. Grace Academy Darlaston 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).

We have security measures in place to prevent yours and your child's information from being accidentally lost, used, or accessed in an authorised way, altered, or disclosed.

How long do we keep your information for?

In retaining personal information, the Grace Academy Darlaston complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the Grace Academy Darlaston 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 outside of the UK, we will do so with the appropriate safeguards in place 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, enquiries@darlaston.graceacademy.org.uk

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.**

In certain circumstances where the Grace Academy Darlaston processes data for the purposes of legitimate interests or to fulfil their public task, individuals have a right to object to the processing where it is likely to cause, or is causing, harm or distress. When exercising this right, individuals should contact the school/academy trust to inform them of their reasons for their objection. The school/academy trust will consider the reasons for any objection and assess the risk to the individual against the purposes for the processing. In the event the school/academy trust is unable to comply with an objection, we will ensure we can demonstrate compelling legitimate grounds to continue with the processing.

Where the Grace Academy Darlaston processes your information with your consent, you have the right to withdraw your consent at any time. To exercise this right, please contact the Grace Academy Darlaston at enquiries@darlaston.graceacademy.org.uk.

You also have the right to:

- 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/>

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

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

Table 3 - Personal information we are required to process with the consent of the individual to whom that information 'belongs' - *please note that you have the right to withdraw your consent for us to process this information at any time.*

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing

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 **some** of 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

Table 5 - Personal information we process because we have a legitimate interest. please note that the right to object will apply to **some** of 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
Images captured on our CCTV system	n/a	This is not shared routinely	n/a

Table 8 All other third party contacts

The link to the Privacy Notices of these third parties details how they use the data they collect. They will also have an agreement with the school that they will comply with the GDPR regulations when using the data of our students. This list is not exhaustive.

Who	What	Why	Privacy Notice Link
Walsall Local Education Authority	Student Data, Contacts, Timetable, Session Attendance, Lesson Attendance	Monitoring across the district	https://go.walsall.gov.uk/privacy_statement
Dudley Virtual Schools	Student name, ID, address, parent/carer, educational needs	To devise a Personal Education Plan and obtain funding to support student	https://www.dudley.gov.uk/privacy-disclaimer-statement/
Sandwell Virtual Schools	Student name, ID, address, parent/carer, educational needs	To devise a Personal Education Plan and obtain funding to support student	https://www.sandwell.gov.uk/info/200295/schools_and_learning/4152/education_skills_and_employment
Birmingham Virtual Schools	Student name, ID, address, parent/carer, educational needs	To devise a Personal Education Plan and obtain funding to support student	https://www.birmingham.gov.uk/privacy
Staffordshire Virtual Schools	Student name, ID, address, parent/carer, educational needs	To devise a Personal Education Plan and obtain funding to support student	https://www.staffordshire.gov.uk/Your-council-and-democracy/Privacy-notices/Privacy-notice.aspx
Wolverhampton Virtual Schools	Student name, ID, address, parent/carer, educational needs	To devise a Personal Education Plan and obtain funding to support student	https://www.wolverhampton.gov.uk/your-council/our-website/privacy-and-cookies-notice
School Psychology Services	Student name, DOB, address, medical data, personal information regarding feelings and behaviour.	To provide psychological support to students in need.	https://www.theschoolpsychologyservice.com/data-protection/

IRIS Biostore	Name, student ID number, Dietary requirements & allergies, Food purchases, Biometric data from fingerprint	Admin of the Cashless Catering System	https://www.iris.co.uk/privacy-policy/
Go 4 Schools	Name, Contacts, Timetable, Demographic information	Provide functionality of Go 4 Schools online	http://www.go4schools.com/PrivacyPolicy.aspx
SIMS	Student Data, Contacts, Timetable, Session Attendance, Demographic information Achievements, Behaviour, Assessment, Student Data (data collection), Contacts (data collection_ Reports	Provide functionality of SIMS Management Information System	https://www.educationsoftwaresolutions.co.uk/privacy-notice
Learning Records Service	ULN, student names, exam results	Collation of student qualification record	https://www.gov.uk/government/publications/lrs-privacy-notice
Department for Education	Student record,	School accountability, national statistics	https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter#dfep-privacy-notice
NHS	Name, student ID number, DOB,	Vaccination Records	https://www.england.nhs.uk/contact-us/privacy-notice/
SIPS Education	Year 12 name & DOB	Work experience placement	https://www.sips.co.uk/gdpr/
WPH Counselling	Student name, DOB, address, medical data, personal information regarding feelings and behaviour.	To provide psychological support to students in need.	https://www.england.nhs.uk/contact-us/privacy-notice/

Evolve	Student Name, Address, DOB, medical & dietary, Parent Name, email, Tel no.	Trip Administration System	https://evolve.edufocus.co.uk/myevolve/privacy.asp
Accessit	Name, student ID number, Year group	Library – book lending software	https://accessitlibrary.com/privacy-policy/
Wonde	Student Data, Contacts, Timetable, Session Attendance, Lesson Attendance	Data transferal to LA	https://www.wonde.com/privacy-policy/
Microsoft Teams	Student name, ID, year group, form. General classroom resources, Homework schedules	Digital Learning Platform	https://privacy.microsoft.com/en-gb/privacystatement
Pearson	Student name, ID, year group, form. General classroom resources, Homework schedules	Digital Learning resources	https://www.pearson.com/uk/pearson-privacy-and-you/privacy-policy/digital-learning-services-privacy-policy.html
Applicaa +	Student Data, Contacts,	Online Admissions Software	https://applicaa.com/privacy-policy/#:~:text=Applicaa%20is%20committed%20to%20protecting,websites%20or%20use%20our%20services.
FFT Aspire	Student Data, Contacts, Timetable, Session Attendance, Lesson Attendance,	Educational benchmarking	https://fft.org.uk/privacy/
GCSE pod	Student name, learning resources, marks,	Online learning and revision tool	https://www.gcsepod.com/privacy-policy/
Provision map Edukey	Student name, ID, year group, form. Medical information General classroom resources, Homework schedules	Learning Plans	https://www.edukey.co.uk/privacy/

Think for the Future	Student name, ID, year group, form. Medical, behavioural	Behaviour and Resillience Mentoring	https://www.thinkforthefuture.co.uk/
GL Assessment	Student name, ID, year group, form. Work, results	Assessment tool	https://www.gl-assessment.co.uk/policies/privacy-policy/#:~:text=In%20general%2C%20when%20you%20visit,or%20individuals%20without%20your%20permission.
Education Software Solutions / Parentpay	Student name, year group, dietary information. Parent data, credit card details	Online payment system	https://www.parentpay.com/privacy-notice/#:~:text=You%20can%20exercise%20your%20rights,before%20we%20action%20your%20request.
CPOMS	Student name, ID, year group, form. Medical information pastoral records	Online safeguarding software	https://www.cpoms.co.uk/privacy/
Smoothwall Monitor	Monitors websites accessed, attempted access and key strokes entered	Online activity monitoring for safeguarding purposes	https://www.familyzone.com/anz/legal
Tempest	Student name, ID, year group, form. Photograph/image	Photographers	https://www.htempest.co.uk/policies/privacy-policy/#:~:text=PRIVACY%20NOTICE,will%20be%20processed%20by%20us.
School comms	Student name, form, parent/carer contact details email, tel no	Online communications software	https://schoolcomms.com/trending-topic/gdpr-and-schoolcomms/
Base 25	Student name, ID, year group, form. Medical, behavioural	Behaviour mentoring	https://base25.org/privacy-policy/
CAMHS	Student name, ID, year group, form. Medical information pastoral records	Mental health support/intervention	https://www.blackcountryhealthcare.nhs.uk/help-advice/privacy-statement

The Ladder School	Name of child, DOB, Address, Ethnicity, Email, Additional needs, Police involvement, Name of school, telephone number, name of contact, Details of intervention needed, Name of parent/carer, GP name and address, Parental consent, Frazer/Gillick consent.	Specialist Offsite Education Provision	chrome-extension://efaidnbmnnnibpcajpcgicclefindmkaj/https://aldrigesschoolblog.files.wordpress.com/2022/05/privacy-notice-secondary-school-pupils-parents.pdf
Impact Education	Name of child, DOB, Address, Ethnicity, Email, Additional needs, Police involvement, Name of school, telephone number, name of contact, Details of intervention needed, Name of parent/carer, GP name and address, Parental consent, Frazer/Gillick consent.	Specialist Offsite Education Provision	https://www.impactindependentschool.co.uk/
JP Alternative Education	Name of child, DOB, Address, Ethnicity, Email, Additional needs, Police involvement, Name of school, telephone number, name of contact, Details of intervention needed, Name of parent/carer, GP name and address, Parental consent, Frazer/Gillick consent.	Specialist Offsite Education Provision	https://www.staffordshireconnects.info/kb5/staffordshire/directory/privacy_policy.page

Liminal Education	Name of child, DOB, Address, Ethnicity, Email, Additional needs, Police involvement, Name of school, telephone number, name of contact, Details of intervention needed, Name of parent/carer, GP name and address, Parental consent, Frazer/Gillick consent.	Specialist Offsite Education Provision	https://liminalcic.org.uk/policies
Shepwell	Name of child, DOB, Address, Ethnicity, Email, Additional needs, Police involvement, Name of school, telephone number, name of contact, Details of intervention needed, Name of parent/carer, GP name and address, Parental consent, Frazer/Gillick consent.	Specialist Offsite Education Provision	https://www.shepwellschool.co.uk/
Brightstars	Name of child, DOB, Address, Ethnicity, Email, Additional needs, Police involvement, Name of school, telephone number, name of contact, Details of intervention needed, Name of parent/carer, GP name and address, Parental consent, Frazer/Gillick consent.	Specialist Offsite Education Provision	Requested on website

Sandwell Community School	Name of child, DOB, Address, Ethnicity, Email, Additional needs, Police involvement, Name of school, telephone number, name of contact, Details of intervention needed, Name of parent/carer, GP name and address, Parental consent, Frazer/Gillick consent.	Specialist Offsite Education Provision	https://sandwellcs.org.uk/policies/?perPage=50
Walsall College	Name of child, DOB, Address, Ethnicity, Email, Additional needs, Police involvement, Name of school, telephone number, name of contact, Details of intervention needed, Name of parent/carer, GP name and address, Parental consent, Frazer/Gillick consent.	Offsite Education Provision	https://www.walsallcollege.ac.uk/privacy-notice/
EdExcel	Student Number, exam entries, marks	Exam boards	https://qualifications.pearson.com/en/privacy-policy.html
UCAS	Student Number, exam entries, marks	Exam boards	https://www.ucas.com/about-us/policies/privacy-policies-and-declarations/ucas-privacy-policy
AQA	Student Number, exam entries, marks	Exam boards	https://www.aqa.org.uk/about-us/privacy-notice
OCR	Student Number, exam entries, marks	Exam boards	https://www.ocr.org.uk/about/our-policies/website-policies/privacy-policy/
Pearson	Student Number, exam entries, marks	Exam boards	https://qualifications.pearson.com/en/privacy-policy.html
WJEC	Student Number, exam entries, marks	Exam boards	https://www.wjec.co.uk/home/privacy-policy/

The Exams Office	Student Number, exam entries, marks	Exam boards	https://www.theexamsoffice.org/data-protection-and-privacy-policy/
Police	Student name, ID, year group, form. Medical information pastoral records	Law Enforcement Organisation	https://west-midlands.police.uk/about-us/privacy-notice/individuals-rights#:~:text=You%20have%20the%20right%20to,99%20calls%2C%20including%20misrouted%20ones.
Impero	Student name, ID, year group, form. General classroom resources, Homework schedules	Digital learning management software	https://www.imperosoftware.com/privacy/#:~:text=We%20do%20not%20allow%20our,our%20website%20for%20more%20information.
School Cloud	Student name, form, parent/carer contact details email, tel no	Online video, parents evening booking system	https://www.schoolcloud.co.uk/privacy-notice.asp#:~:text=We%20are%20committed%20to%20protecting,will%20be%20processed%20by%20us.
Prospects	Student Name, Address, ULN, UPN, DOB, Gender, Ethnicity, Alternative Provisions, SEN, parent email & phone number	Further student support & Destination Data for DFE	https://prospect.org.uk/privacy/
S2S	Student Name, Student Number, Student Age, Target Data	Employment Program	chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://ingeus.com/ingeus/media/ingeus/news/s2s-privacy-notice-annex-may-2020-(002).pdf
Best Practise Network	Staff name, address, qualifications, job title	Provide appropriate training and development resources	https://www.bestpracticenet.co.uk/privacy-notice#:~:text=Our%20privacy%20promise&text=To%20comply%20with%20the%20law,be%20able%20to%20do%20so.
Exampro	Student Name, Student Number, Student year group, student work	Learning Resource	https://www.exampro.co/privacy-policy#:~:text=We%20will%20retain%20and%20use,Data%20for%20internal%20analysis%20purposes.
Nessy	Student Name, Student Number, Student year group, student work	Learning Resource	https://www.nessy.com/en-gb/shop/data-privacy-legal

Mymaths	Student Name, Student Number, Student year group, student work	Learning Resource	https://global.oup.com/privacy?cc=gb
Scratch	Student Name, Student Number, Student year group, student work	Learning Resource	https://scratch.mit.edu/privacy_policy
GCSE Pod	Student Name, Student Number, Student year group, student work	Learning Resource	https://www.gcsepod.com/privacy-policy/
Seneca	Student Name, Student Number, Student year group, student work	Learning Resource	https://senecalearning.com/en-GB/privacy
Century Tech	Student Name, Student Number, Student year group, student work	Learning Resource	https://www.century.tech/terms-of-use-privacy-intellectual-policy/
Massolit	Student Name, Student Number, Student year group, student work	Learning Resource	https://www.massolit.io/privacy
Kerboodle	Student Name, Student Number, Student year group, student work	Learning Resource	https://global.oup.com/privacy?cc=gb
Onmaths	Student Name, Student Number, Student year group	Learning Resource	https://www.onmaths.com/privacy-policy-and-gdpr/
Active Learn	Student Name, Student Number, Student year group	Learning Resource	https://loginstatic.pearson.com/html/EU/PearsonPrivacyPolicy_en_GB.html?cc=GB&lang=en_GB
NextGen Makers	Student Name, address, email, telephone number	As directed by student for job applications	Req 28/06/23
Grace Foundation	Student Name, Student Number, Student year group, medical and dietary data.	Student and parent support, annual funded trip to London	https://www.grace-foundation.org.uk/privacy-policy/

Review The content of this Privacy Notice will be reviewed: June 2024

