

Students and parents’ privacy notice policy

Contents

Section	Page
1.0 Introduction	4
2.0 What is personal information?	4
3.0 What personal information does our trust hold about you and how is this obtained?	4
4.0 How and why does the academy and our trust collect and use personal information?	5
5.0 How we store this data	6
6.0 Data sharing	6
7.0 National pupil database	7
8.0 Youth Support Services	7
9.0 Transferring data internationally	7
10.0 Data subjects' rights regarding personal data	7
11.0 Other rights	8
12.0 Complaints	8
13.0 Contact	8



1.0 Introduction

- 1.1 Under data protection law, individuals have a right to be informed about how the academy uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.
- 1.2 This notice is to help you understand how and why we collect your personal information and what we do with that information. It also explains the decisions that you can make about your own information.
- 1.3 We, Dixons Academies Trust, are the 'data controller' for the purposes of data protection law.
- 1.4 Our data protection officer is Mrs Kathryn Berrill (see 'contact us' below).

2.0 What is personal information?

- 2.1 Personal information is information that identifies you as an individual and relates to you. This includes your contact details, next of kin and financial information. We may also hold information such as your religion or ethnic group.

3.0 Our legal bases for using your information

- 3.1 Under data protection law, a data controller must have a valid lawful basis in order to process personal data.
- 3.2 This section contains information about the legal bases that we are relying on when handling your information as described above.
- 3.3 We have set out below a general description of the different legal bases and we have also highlighted which basis we are relying on for each of the purposes described in this privacy notice.

3.4 Legal obligation

Where the academy needs to use your information in order to comply with a legal obligation, for example to report a concern to children's services. We may also have to disclose your information to third parties, such as the courts, the local authority or the police where legally obliged to do so.

3.5 Necessary for contract

We will need to use your information in order to perform our obligations under any contract we have with you, for example, if you buy tickets for an event.

3.6 Vital interests

In limited circumstances we may use your information to protect your vital interests or the vital interests of someone else (eg, if you or they are seriously hurt).

3.7 Performance of a task carried out in the public interest

The following are examples of when we use your information to perform tasks in the public interest:

- providing your child with an education
- safeguarding and promoting your welfare, your child's welfare and the welfare of other children
- facilitating the efficient operation of the academy
- ensuring that we comply with all of our legal obligations

3.8 Legitimate interests

This means that the academy is using your information when this is necessary for the academy's legitimate interests except when your interests and fundamental rights override our legitimate interests.

We have a legitimate interest in using your information to:

- promote the academy including fundraising and publicity
- preserve historical academy records

We must also comply with an additional condition where it processes special categories of personal information where we must have two legal bases for collecting the data. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information and information about sex life or orientation.

3.9 Substantial public interests

The academy is also allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This is similar to "public interest" in item 3.7 above. For example, the academy may use medical information when looking after your child. We may also use other types of special category personal data about you when the academy is inspected.

3.10 Social protection and social security laws

Also the academy will use your information to comply with social protection law (eg, to look after your child) and social security laws (eg, to provide your child with free school meals if applicable).

3.11 Legal claims

We are allowed to use your information if this is necessary in relation to legal claims, for example. This allows us to share information with our legal advisors and insurers.

3.12 Medical purposes

This includes medical treatment and the management of healthcare services.

3.13 Consent

Specific consent is required from you when collating biometric data and for using photos.

4.0 How and why does the academy and our trust collect and use personal information?

4.1 We set out below examples of the different ways in which we use personal information, where this personal information comes from and the legal reason for collecting it.

What we may collect and hold	Why	Legal basis
<ul style="list-style-type: none"> Contact details Contact preferences 	The academy's primary reason for using your personal information is to provide your child with an education.	legitimate interests public interest substantial public interest
<ul style="list-style-type: none"> Date of birth Identification documents Characteristics such as ethnic background, eligibility for free school meals or special education needs 	We obtain information about you from admissions forms and from your child's previous school. You may provide us with information about you from professionals such as doctors and local authorities during the admissions process. When your child is at the academy we may obtain information about you from these individuals.	legitimate interests public interest substantial public interest social protection and social security laws medical purposes
<ul style="list-style-type: none"> Exclusion information 	We will have information about any family circumstances which might affect your child's welfare or happiness. This is to help us provide appropriate care and support to your child.	legitimate interests public interest substantial public interest social protection and social security laws
<ul style="list-style-type: none"> Details of any medical conditions, including physical and mental health Attendance information 	We will need information about any court orders or criminal petitions which relate to you. This is so that we can safeguard the welfare and wellbeing of your child and the other students at the academy.	legitimate interests public interest substantial public interest social protection and social security laws
<ul style="list-style-type: none"> Safeguarding information Details of any support received, including care packages and support providers 	If there is a complaint or grievance made to the academy which involves you then we will use your information in connection with that complaint or grievance.	legitimate interests public interest substantial public interest
CCTV images	We use CCTV to make sure the academy site is safe. Images captured of you via CCTV will be your personal data. CCTV is not used in private areas such as toilets.	necessary for a contract public interest special public interest
Religious beliefs	Where appropriate, the academy will have information about your religious beliefs and practices. For example, if you do not eat certain foods.	public interest special public interest
Photographs and videos	We may take photographs or videos of you at academy events to use on social media and on the academy website. This is to show prospective parents / carers what we do here and to advertise the academy. We may continue to use these photographs and videos after your child has left the academy.	legitimate interests consent
Contact information	We will send you information to keep you up to date and what is happening at the academy. For example, by sending you information about events and activities taking place (including fundraising events) and a newsletter.	legitimate interests



What we may collect and hold	Why	Legal basis
Financial information	If you buy things from the academy such as tickets for events or sportswear, we may hold financial information about you.	necessary for a contract legitimate interest
Contact information Exam results	We may use information about you if we need this for historical purposes. For example, if we consider the information might be useful if someone wanted to write an article about the academy.	legitimate interest

5.0 How we store this data

5.1 We keep personal information about students whilst they are attending our academy. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. Please refer to our records retention and data management policy, which can be found on our website.

6.0 Data sharing

6.1 We do not share information about students with any third party without consent unless the law and our policies allow us to do so. Where is it legally required or necessary (and it complies with data protection law) we may share personal information about students with:

Who we will share your data with	Why	Legal basis
Local authorities, health authorities, Ofsted, children's services, the NHS and the Department for Education	To comply with any safeguarding concerns, permanent exclusions, or to comply with our legal obligations. If your child has an education and health care plan (EHCP) we will share information with and obtain information from the local authority about you. We will share data with those agencies in order to improve the services offered to families in school.	legitimate interests public interest special public interest
The police, courts and tribunals	For the prevention and investigation of crime and the prosecution of offenders. We will only do this in specific circumstances to assist the police with their investigations. To comply with any safeguarding concerns. We may use your information when responding to an incident, for example, if something is published on social media which concerns the academy.	legitimate interests public interest special public interest
Children's Commissioner's Office (CCO)	The CCO collects data on children to provide up to date evidence on their lives, experience, views and outcomes of children in England. This is used to better represent the rights, interests and views of children.	consent public interest
The health and safety executive (HSE)	If there is a health and safety issue at the academy	vital interests public interest special public interest medical purposes
Legal advisors	For the purpose of obtaining legal advice and legal representation. We may use your information when responding to an incident, for example, if something is published on social media which concerns the academy.	
Consultants, experts and other advisors (including accountants and auditors)	To assist the academy in fulfilling its obligations and to help run the academy properly (for example, our accountants).	
Insurance company	Where there is a serious incident at the academy.	
Other academies in our trust	We may share information about you with the other academies in our trust. For example, details of family circumstances, education information, behaviour information in relation to a managed move.	vital interests public interest special public interest medical purposes



Who we will share your data with	Why	Legal basis
Other schools and educators	If your child leaves us to attend another school we will need to provide that school with information about you.	vital interests public interest special public interest medical purposes
Emergency services and other third parties	We may need to share information with third parties if there is an emergency, for example if you are hurt whilst on our premises.	vital interests public interest special public interest medical purposes
Suppliers and service providers	To enable them to provide the service we have contracted them for.	necessary for a contract
Examining bodies	To fulfil their obligations as part of providing you with an education.	public interest

7.0 National pupil database

- 7.1 We are required to provide information about students to the Department for Education as part of statutory data collection, such as the school census.
- 7.2 Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the Department and provides evidence on school performance to inform research.
- 7.3 The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources, including schools, local authorities and exam boards.
- 7.4 The Department for Education may share information from the NPD with other organisations which promote children’s education or well-being in England. Such organisations must agree to strict terms and conditions about how they will use the data.
- 7.5 For more information, see the Department for Education’s webpage on how it collects and shares research data.
- 7.6 You can also contact the Department for Education with any further questions about NPD.

8.0 Youth Support Services

- 8.1 Once our students reach the age of 13, we are legally required to pass on certain information about them to local authorities as it has legal responsibilities regarding the education or training of 13- to 19-year-olds.
- 8.2 This information enables them to provide youth support services, post 16 education and training and careers advisors.

9.0 Transferring data internationally

- 9.1 We will only transfer personal data to a country or territory within the European Economic Area and other countries with adequate data protection safeguards.

10.0 Data subjects’ rights regarding personal data

- 10.1 Individuals have a right to make a subject access request to gain access to personal information that the academy holds about them.
- 10.2 With academies, including free schools and independent schools, there is no automatic parental right of access to the educational record. Parents / carers can make a request with respect to their child’s data, where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.
- 10.3 Parents also have the right to make a subject access request with respect to any personal data the school holds about them. If you make a subject access request, and if we do hold information about you or your child, we will:
- give you a description of it
 - tell you why we are holding and processing it, and how long we will keep it for
 - explain where we got it from, if not from you or your child
 - tell you who it has been, or will be, shared with
 - let you know whether any automated decision-making is being applied to the data (and any consequences of this)
 - give you a copy of the information in an intelligible form

10.4 Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances. If you would like to make a request, please contact our Data Protection Officer.

11.0 Other rights

11.1 Under Data Protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- object to the use of personal data if it would cause, or is causing, damage or distress
- prevent it being used to send direct marketing
- object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- in certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- claim compensation for damages caused by a breach of the data protection regulations. To exercise any of these rights, please contact our Data Protection Officer.

12.0 Complaints

12.1 We take any complaints about our collection and use of personal information very seriously.

12.2 If you think that our collection, or use of personal information, is unfair, misleading or inappropriate, or have any other concerns about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our Data Protection Officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- report a concern online at <https://ico.org.uk/concerns/>
- call 0303 123 1113
- or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

13.0 Contact

13.1 If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer, Mrs Kathryn Berrill: DPO@dixonsat.com

Dixons Academies Trust, The Lewis Building, Dixons City Academy, Ripley Street, Bradford, BD5 7RR