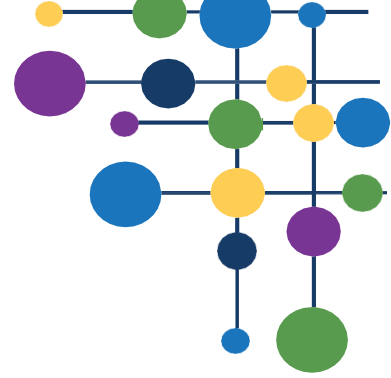


PUPILS, PARENTS & CARERS PRIVACY NOTICE FOR USE WITHIN THE TRUST

Version	2.0
Name of policy writer	Jayne Newson
Date of last review	6 th February 2025
Next review date	June 2027
Approved by Directors or Delegated Authority	1 st June 2026





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Introduction

SHARE Multi-Academy Trust, whose registered office is at Shelley College, Huddersfield Road, Shelley, Huddersfield HD8 8NL is the data controller for the use of personal data in this privacy notice.

The trust is registered with the ICO under registration number ZA479462.

The trust has a Data Protection Officer whose contact details are set out below:

Jayne Newson – Data Protection Officer

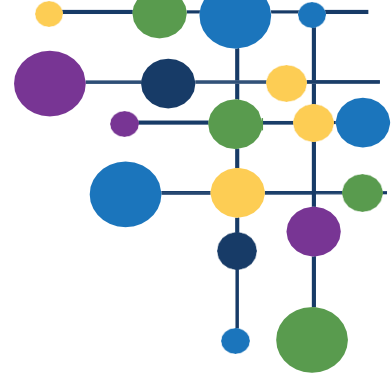
Email: jayne.newson@sharemat.co.uk

Tel: 01484 955007

By post to:

Mrs J Newson
 Data Protection Officer
 Heaton Avenue, A SHARE Primary Academy
 South Parade
 Cleckheaton
 West Yorkshire
 BD19 3AE





This privacy notice advises pupils, parents, carers and guardians of our data protection responsibilities on the collection and processing of their personal information.

We collect and process personal data to support the operation of the trust and its schools and to provide education, safeguarding and support services to pupils and families.

We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations. The trust processes personal data in accordance with UK GDPR, the Data Protection Act 2018, and other applicable UK data protection legislation, including relevant provisions under the Data (Use and Access) Act 2025.

The categories of pupil information that we process

The categories of pupil information that we process include:

- personal identifiers and contacts (such as name, date of birth, unique pupil number, contact details and address)
- characteristics (such as ethnicity, language, pupil premium and free school meal eligibility)
- safeguarding information (such as court orders, referral and assessment information and professional involvement)
- special educational needs (including the needs and ranking)
- medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (such as Early Years Foundation Stage Profile, key stage 1, key stage 2, multiplication tables check and phonics results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- admissions (such as information relating to entitlement to early years funding including parent or carer's national insurance number)
- information and consent requested for specific trips and activities (such as passport, contact and medical information and consent)
- Images (including photographs and videos).

Information is also held about the parent or guardian of a pupil. This information is held under a legal obligation to ensure that we can make contact. Such information includes:

- Name and address
- Contact telephone number(s)
- Email address
- Alternative emergency contact details.

This list is not exhaustive.

Where processing is likely to result in a high risk to individuals' rights and freedoms, the trust carries out Data Protection Impact Assessments (DPIAs).

All third party processors handling personal data on behalf of the trust are subject to contractual data protection obligations.





Why we collect and use pupil information

We will only collect pupil information when we have a good reason to do so in line with the law – this is known as having a lawful basis to use data. Here are the reasons we collect your information:

- a) to support pupil learning
- b) to monitor and report on pupil attainment progress
- c) to provide appropriate pastoral care
- d) to assess the quality of our services
- e) to keep children safe*
- f) to meet the statutory duties placed upon us by the Department for Education
- g) to provide additional curriculum opportunities
- h) to promote the achievements of pupils and the work of the trust and its schools.

** This includes using CCTV in certain locations on the school site for safeguarding, safety and security purposes.*

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing pupil information are:

- for the purpose of (a), (b), (c), (d), (e), (f) and (g) in accordance with the legal basis of public task: collecting the data is necessary to perform tasks that the trust and its schools are required to perform as part of their statutory function
- for the purpose of (e) in accordance with the legal basis of vital interests: to keep pupils safe (food allergies, medical conditions or disclosure of information about pupils to prevent them or being seriously harmed)
- for the purpose of (f) in accordance with the legal basis of legal obligation: fulfilling our statutory reporting requirements to the Department for Education (DfE)
- for the purpose of (h) in accordance with the legal basis of consent: to use personal data such as images in displays, on our website, on our social media and in publications to celebrate the achievements of pupils and to promote the work of the trust and its schools.

Some information we process is considered more sensitive under data protection law, such as health information, ethnicity, religious beliefs and safeguarding information. We only use this information where the law allows us to do so and where it is necessary to support pupils, safeguard children, meet our legal duties or provide education services.

We may also process other sensitive information where necessary to support pupils, safeguarding and educational provision. This sensitive information includes children's services interactions, free school meal status, pupil premium eligibility, elements of special educational needs information, safeguarding information and some behaviour data.

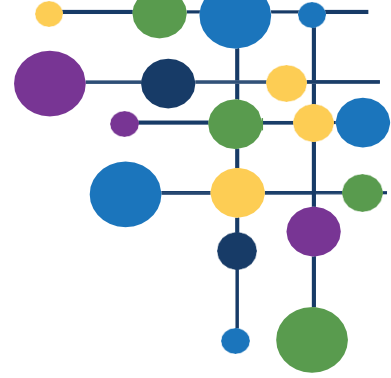
Automated decision-making and profiling

The trust does not make solely automated decisions about pupils or parents.

Collecting pupil information

We collect pupil information in a variety of ways. Some information comes from registration forms completed when your child joins the school or through secure transfer from previous schools or





settings. We also receive information about pupils from other agencies, such as the local authority and healthcare professionals. Data is also obtained from your child and their teachers.

Pupil data is essential for the trust and its schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with data protection legislation, we will inform you at the point of collection whether you are required to provide certain pupil information to us or if you have a choice.

Storing pupil data

We take the security of pupils' personal data very seriously. Data is stored in the UK/Ireland, however some service providers may process limited personal data outside the UK. Where this occurs, appropriate safeguards are applied in accordance with UK GDPR. We have internal policies and controls in place to try to ensure that data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where we engage third parties to process personal data on our behalf, they do so based on written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

We hold pupil data securely for the set amount of time shown in our data retention schedule which is aligned with the IRMS Management Toolkit. For more information on our data retention schedule and how we keep your data safe, please visit our data protection policies available on SHARE Multi-Academy Trust's website.

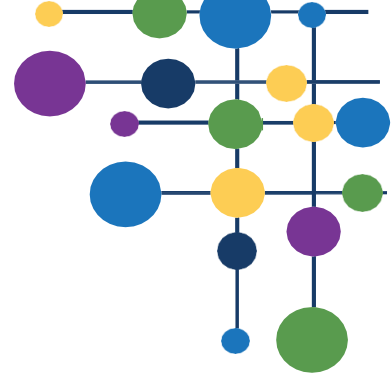
Who we share pupil information with

We routinely share pupil information with:

- The Local Authority for the school, including social care and SEND teams
- The Department for Education (DfE)
- SHARE Multi-Academy Trust
- NHS
- School nurse
- Schools that pupils attend after leaving us
- Ofsted
- Central and local government
- Our auditors
- Professional advisors and consultants
- Police and legal forces
- Professional bodies.

CCTV footage may be shared with police or other lawful authorities where necessary for the prevention or detection of crime, safeguarding or where required by law. In addition to this, we regularly share information with a number of contracted third parties in order to carry out our public task of running the trust and its schools safely and effectively.





Why we regularly share pupil information

We do not share information about our pupils 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.

Pupils' data, where it is reasonable to do so, may also be shared with other professionals such as health and social care professionals, outside education professionals and advisers in order to meet the individual needs of our pupils.

In addition, we have contracts with third parties for IT services or as part of cloud based storage applications for the purpose of securely holding and protecting your data. We also subscribe to online learning platforms that provide children with engaging personalised learning programmes. Before entering into a contract, we ensure that adequate policies and security measures are in place.

Here are some further examples of why we collect, hold and share pupils' personal data.

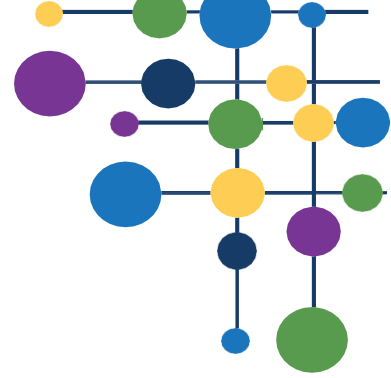
- We may need to share information about your child's health and wellbeing with those who have responsibility for pupil welfare.
- We need to tell all appropriate members of staff if your child has specific medical needs.
- We need to tell all appropriate members of staff if your child might need extra help with some tasks.
- Sometimes we need to share information with the police or our legal advisers to help with an inquiry. For example, safeguarding issues or injuries.
- We might need to share pupils' information with consultants, experts and other advisers who assist us to meet individual pupils' needs and in the running of the school, if this is relevant to their work.
- We may need to share some information with our insurance provider to ensure we maintain cover or to process any claims.
- We may need information about any court proceedings or judgements concerning your child. This is so that we can safeguard your child's welfare and the welfare of other pupils at the school.
- Where we have CCTV in operation, we need to monitor data to make sure the school sites are safe. In some schools, CCTV may also be used in the communal (non-cubicle) areas of toilet blocks, such as entrances, sinks, and hand-washing areas. Cameras will never monitor private areas such as cubicles, ingress and egress to cubicles or changing rooms. This processing is carried out to safeguard pupils, prevent bullying or vandalism, and maintain a safe environment. Signage is displayed where CCTV operates. Access to footage is strictly limited to authorised senior staff and is only accessed where there is a legitimate reason to do so. Retention periods are short and all images are stored securely.
- We may use photographs or videos of your child on our website, social media sites, newsletters and publications to celebrate achievements and to promote the work of the trust and its schools. We would always have sought your consent before doing this.

Personal data is transferred and stored securely using appropriate technical and organisational security measures.

Department for Education

The DfE collects personal information from us and our LA through various collections the school is required to undertake legally. We are required to share information about pupils with the DfE





either directly or via our LA for the purpose of those data collections, under:

- [regulation 5 of The Education \(Information About Individual Pupils\) \(England\) Regulations 2013.](#)

All information we share with the DfE is transferred securely and held by the DfE under a combination of software and hardware controls which meet the current government security policy framework, which can be found by following this link: <https://www.gov.uk/government/publications/security-policy-framework>

How the government uses your data

The pupil data that we lawfully share with the DfE through data collections:

- Underpins school funding, which is calculated based upon numbers of pupils and their characteristics in each school.
- Informs 'short-term' education policy monitoring and school accountability and intervention.
- Supports 'longer-term' research and monitoring of educational policy, e.g. how certain subject choices go on to affect education or earnings beyond school.

To find out more about the data collection requirements placed on us by the DfE, e.g. via the school census, follow this link: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

The National Pupil Database (NPD)

Much of the data about pupils in England goes on to be held in the NPD.

The NPD is owned and managed by the DfE and contains information about pupils in schools in England – it provides evidence on educational performance to inform independent research as well as studies commissioned by the DfE.

Information on the NPD is held in an electronic format for statistical purposes and it is securely collected from a range of sources, including schools, LAs and awarding bodies.

You can find out more about the NPD by following this link:

<https://www.gov.uk/government/publications/national-pupil-database-mpd-privacy-notice/nationalpupil-database-mpd-privacy-notice>

Sharing by the DfE

The DfE is legally allowed to share pupils' personal information with certain third parties, including the following:

- Schools
- Local Authority - we may also be required to share information about our pupils with the local authority to ensure that they can conduct their statutory duties. Data sharing agreements are in place
- Researchers
- Organisations connected with promoting the education or wellbeing of children in England
- Other government departments and agencies
- Organisations fighting or identifying crime, such as the Home Office and the police, may use their legal powers to contact the DfE to request access to individual level information relating to a crime.





For more information about how the DfE collects and shares pupil information, you can look at the information in the following two links:

- <https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>
- <https://www.gov.uk/government/publications/dfE-external-data-shares>

How to find out what personal information the DfE holds about pupils

Under the Data Protection Act 2018, pupils and parents are entitled to ask the DfE what personal information it holds. You have the right to ask the DfE:

- If it processes personal data
- For a description of the data it holds
- The reasons it is holding the data and any recipient it may be disclosed to
- For a copy of the personal data and any details of its source.

To exercise these rights, you should make a subject access request. Information on how to do this can be found by following this link:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-informationcharter>

You can also contact the DfE directly using its online contact form by following this link: <https://www.gov.uk/contact-dfe>.

The use of Artificial Intelligence (AI)

The trust does not make solely automated decisions about pupils. Any decisions affecting pupils are reviewed by appropriately authorised staff. SHARE MAT follows strict data security and privacy controls.

The trust may use approved AI tools to support administrative and educational activities. AI tools are not used to make solely automated decisions about pupils. Any use of AI involving personal data is subject to human oversight, security controls and data protection safeguards. The trust currently uses Microsoft 365 Copilot within its secure Microsoft environment.

Further information about the use of AI can be found in the SHARE MAT Artificial Intelligence Policy & Procedure.

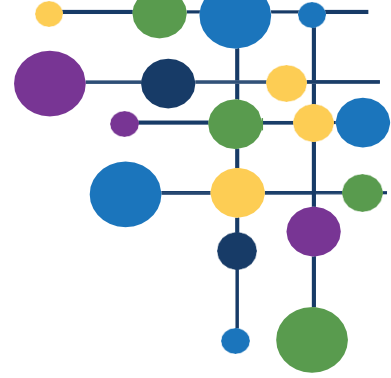
Requesting access to your personal data

Under UK GDPR, 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 be given access to your child's educational record, contact the school's principal (contact details can be found on the website) or the trust's Data Protection Officer, whose contact details are set out at the beginning of this privacy notice.

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'
- the right to ask us for copies of your personal information we have about you – this is called 'right of access', this is also known as a subject access request (SAR), data subject access request or right of access request





- the right to ask us to change any information you think is not accurate or complete – this is called ‘right to rectification’
- the right to ask us to delete your personal information – this is called ‘right to erasure’
- the right to ask us to stop using your information – this is called ‘right to restriction of processing’
- the ‘right to object to processing’ of your information, in certain circumstances
- rights in relation to automated decision making and profiling
- the right to withdraw consent at any time (where relevant)
- the right to complain to the Information Commissioner if you feel we have not used your information in the right way.

Where appropriate, privacy information will also be explained directly to the pupils in language suitable for their age and understanding.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don’t have the right to object, but you have the right to withdraw consent.

We will normally respond to information rights requests within one calendar month.

The right to raise concerns, complaints or withdrawal of consent

If you have any concerns about the way we collect or process your data or you would like to discuss anything in this privacy notice, please contact the Data Protection Officer in the first instance.

You can also contact the Information Commissioner’s Office (ICO) at <https://ico.org.uk/concerns>. The ICO is the UK’s independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

Where we are processing your personal data with your consent, you have the right to withdraw that consent. This only applies where consent is the lawful basis and does not affect statutory processing.

If you require further information about how we and/or the DfE store and use your personal data, please visit our [website](#) where you can find the latest version of our Data Protection Policy, or the Gov.UK website, (<https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>).

If you require this privacy notice in an alternative format, please contact the Data Protection Officer.





Schedule of Amendment

Version	Amendment
1.0	New version
2.0	Strengthened the document in terms of AI governance, CCTV transparency, international transfers, children's transparency and DUAA 2025 awareness and technical wording amended to be more reader friendly

