DIOCESE OF CHICHESTER ACADEMY TRUST

Privacy Notice for Pupils, Parents and Carers

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Introduction

The Diocese of Chichester Academy Trust is committed to protecting the privacy and security of your personal information. This privacy notice explains how the Diocese of Chichester Academy Trust (DCAT) collect, store and use personal data about its pupils in accordance with the General Data Protection Regulation (GDPR), section 537A of the Education Act 1996 and section 83 of the Children Act 1989. If it, or any information linked to it is unclear, please contact the Data Manager via 01323 465400, or the Trust's Data Protection Officer:
Handsam Ltd
Office 27 East Moons Moat Business Centre
Oxleaslow Road
Redditch
Worcestershire
B98 0RE.
Email: info@handsam.co.uk
Telephone: 03332 070737

Who collects this information?

The Diocese of Chichester Academy Trust is a "data controller." This means that we are responsible for deciding how we hold and use personal information about pupils.

The Categories of Pupil Information That We Collect, Process, Hold and Share

We may collect, store and use the following categories of personal information about you: -

- Personal information such as name, pupil number, date of birth, gender and contact information;
- Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses;
- Characteristics (such as ethnicity, language, nationality, country of birth and free academy meal eligibility);
- Attendance details (such as sessions attended, number of absences and reasons for absence);
- Performance and assessment information;
- Behavioural information (including exclusions);
- Special educational needs information;
- Relevant medical information;
- Special categories of personal data (including [*ethnicity, relevant medical information, special educational needs information*]);
- Images of pupils engaging in academy activities; and

- Information about the use of our IT, communications and other systems, and other monitoring information.

We recognise that pupils are children and that children's personal data requires particular care. We will provide privacy information in clear and age-appropriate language and will take account of children's needs and understanding when explaining how their personal data is used and how they can exercise their rights.

Collecting This Information

Whilst the majority of information you provide to us is mandatory because we are required to collect it by law or because it is necessary for the provision and administration of education and related services, some information may be provided on a voluntary basis. Where we collect personal information directly from you, we will explain whether the provision of that information is a statutory or contractual requirement, or whether you may choose whether to provide it, and the possible consequences of not providing it. We will only rely on consent where consent is an appropriate lawful basis.

Where we obtain personal information from a source other than you or the pupil, we will provide the privacy information required by law within the applicable timescale, unless a legal exemption applies. This may include information received from another school, the local authority, health or social care services, the DfE or other public authorities.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

How We Use Your Personal Information

We hold pupil data and use it for: -

- Pupil selection (and to confirm the identity of prospective pupils and their parents);
- Providing education services and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Informing decisions such as the funding of academies;
- Assessing performance and to set targets for academies;
- Safeguarding pupils' welfare and providing appropriate pastoral (and where necessary medical) care;
- Support teaching and learning;
- Giving and receive information and references about past, current and prospective pupils, and to provide references to potential employers of past pupils;
- Managing internal policy and procedure;
- Enabling pupils to take part in assessments, to publish the results of examinations and to record pupil achievements;
- To carry out statistical analysis for diversity purposes;
- Legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care;

- Enabling relevant authorities to monitor the academy's performance and to intervene or assist with incidents as appropriate;
- Monitoring use of the academy's IT and communications systems in accordance with the academy's IT security policy;
- Making use of photographic images of pupils in academy publications, on the academy website and on social media channels;
- Security purposes, including CCTV; and
- Where otherwise reasonably necessary for the academy's purposes, including to obtain appropriate professional advice and insurance for the academy.

We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances: -

- Consent: the individual has given clear consent to process their personal data for a specific purpose;
- Contract: the processing is necessary for a contract with the individual;
- Legal obligation: the processing is necessary to comply with the law (not including contractual obligations);
- Vital interests: the processing is necessary to protect someone's life.
- Public task: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law; and
- The Education Act 1996: for Departmental Censuses 3 times a year. More information can be found at: https://www.gov.uk/education/data-collection-and-censuses-for-schools.

Where we process special category data, such as health, biometric, racial or ethnic, or other protected information, we will identify and rely on an appropriate condition under Article 9 UK GDPR and, where required, an additional condition under the Data Protection Act 2018. We will apply appropriate safeguards and only process the minimum information necessary for the purpose.

Recognised legitimate interests: where the conditions in the UK GDPR, as amended by the Data (Use and Access) Act 2025, are met and the processing is necessary for a recognised legitimate interest. Where we process special category data, we will also identify an appropriate Article 9 condition and, where required, a condition under the Data Protection Act 2018. Where we process personal data relating to criminal convictions and offences, we will comply with the additional requirements of Article 10 UK GDPR and the Data Protection Act 2018.

The specific lawful basis used will depend on the purpose for which the information is being processed. Where special category data is processed, an additional condition under Article 9 UK GDPR will also be identified. Further details are available in the Trust's data protection policies and records of processing activities.

Sharing Data

We may need to share your data with third parties where it is necessary. There are strict controls on who can see your information. We will not share your data if you have advised

us that you do not want it shared unless it's the only way we can make sure you stay safe and healthy or we are legally required to do so.

We share pupil information with: -

- the Department for Education (DfE) and other government departments or agencies, where required or permitted by law, including through statutory education data collections;
- Ofsted and other regulatory or inspection bodies where required or permitted by law;
- youth support services where the relevant statutory requirements are met;
- other schools or academies within the Trust where necessary and lawful;
- other schools, academies, colleges or education providers that pupils have attended, or will attend, where necessary and lawful;
- the NHS and health or medical professionals where necessary and lawful;
- welfare and safeguarding services, including children's social care;
- law enforcement and other public authorities, including the police and HMRC, where required or permitted by law;
- the Local Authority Designated Officer (LADO) and other safeguarding agencies where necessary and lawful;
- professional advisers such as lawyers, auditors and consultants where necessary and lawful;
- service providers and support services, including insurance, IT support, information security and other data processors; and
- the local authority and other public bodies where required or permitted by law.

Information will be provided to recipients securely and, where appropriate and lawful, in an anonymised or pseudonymised form. Where we use a data processor, we will have appropriate contractual arrangements and require it to process personal data only in accordance with our instructions and applicable data protection law.

Recipients of personal information may also have their own legal responsibilities as independent data controllers. Where appropriate, we will ensure that data-sharing arrangements, confidentiality obligations and security measures are in place and that information is handled in accordance with data protection law.

We may transfer personal information outside the UK where this is necessary and lawful. Where we do so, we will comply with the UK GDPR requirements for international transfers and ensure that appropriate safeguards or an applicable adequacy regulation are in place.

The National Pupil Database (NPD)

The NPD is owned and managed by the Department for Education and contains information about pupils in academies in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including academies, local authorities and awarding bodies. We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the academy census and early years' 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 the NPD, go to:-
https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information.
The department may 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; and
- Providing information, advice or guidance.

The Department 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 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 information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

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

For information about which organisations the department has provided pupil information, (and for which project), please visit the following website:
https://www.gov.uk/government/publications/national-pupil-database-requests-received

To contact DfE: https://www.gov.uk/contact-dfe

Why We Share This Information

We share information only where there is a lawful basis for doing so. This may be because the sharing is required by law, necessary for a public task or statutory function, necessary to protect someone's vital interests, based on consent where consent is appropriate, or otherwise permitted by data protection law. We will not use consent as the lawful basis where the law provides another appropriate basis.

For example, we share student's data with the DfE on a statutory basis which underpins academy funding and educational attainment. To find out more about the data collection requirements placed on us by the DfE please go to https://www.gov.uk/education/data-collection-and-censuses-for-schools

Storing Pupil Data

We keep information about pupils on computer systems and sometimes on paper. Any information about pupil is kept secure and except as otherwise permitted or required by applicable law or regulation. Except as required by law, the Trust only retains information about pupils for as long as necessary in accordance with timeframes imposed by law and our internal policy.
The Trust/School only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

If you require further information about our retention periods, please let the Data Manager know who can provide you with a copy of our policy.

We have data protection policies and procedures in place, including strong organisational and technical measures, which are regularly reviewed.

Automated Decision Making

Automated decision making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision making in limited circumstances.

Pupils will not be subject to automated decision-making, unless we have a lawful basis for doing so and we have notified you.

Requesting Access to Your Personal Data and Your Data Protection Rights

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, contact the Data Manager**.**

If you make a subject access request, and if we do hold information about you, 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; and
- Give you a copy of the information in an intelligible form.

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 the Data Manager via emailing admin@stcatherines.college. This request will then be actioned by the Data Protection Officer, who will comply within 30 days.

You also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress (however, this will not apply if the data is part of a legal requirement);
- 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 want to exercise any of the above rights, please contact the Data Manager in writing. We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to Withdraw Consent

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Manager**.** Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Contact us

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with the Data Manager in the first instance.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by the Data Manager, then you can contact the DPO on the details below:
Handsam Ltd:
Office 27 East Moons Moat Business Centre
Oxleaslow Road
Redditch
Worcestershire
B98 0RE
Email: info@handsam.co.uk
Telephone: 03332 070737

Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance. We will acknowledge a data protection complaint within 30 days, take appropriate steps to investigate it and keep you informed of progress where appropriate. We will communicate the outcome without undue delay.

To make a complaint, please contact our Data Protection Officer:
Handsam Ltd:
Office 27 East Moons Moat Business Centre
Oxleaslow Road
Redditch
Worcestershire
B98 0RE.
Email: info@handsam.co.uk
Telephone: 03332 070737

Alternatively, or failing a satisfactory conclusion, 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

Changes to This Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.