

# Privacy Notice 2022/23

## Who we are

We are the Alumnis Multi-Academy Trust [Alumnis], whose central office is based at Caddsdow Business Support Centre, Bideford, Devon EX39 3BE. Member Schools in our organisation are:

- Bampton Church of England School
- Clawton Primary School
- The Clinton Church of England School
- Combe Martin Primary School
- Dolton Church of England School
- St Helen's Church of England School
- Woolacombe School

Each of our schools complies with the terms set out in this Privacy Notice. Our DPO is **XXXXXXXXXXXXXXXX** who can be contacted via email at [dpo@alumnismat.org](mailto:dpo@alumnismat.org).

## What information we process and why

We process personal data relating to learners, parents, staff, volunteers, Governors and Trustees of our organisation. Collectively we refer to you all as our Learning Community.

We process personal data so that we can provide education to our learners, and to ensure that we comply with the statutory requirements for Multi-Academy Trusts. We are lawfully allowed to process data about our learners in order to ensure that we fulfil our public tasks and comply with our legal obligations, please see Appendix A for details on how the Government uses data that we share with them. Personal data about staff is processed on the basis of the contract we have with them. Personal data about Trustees, Governors and any volunteers is processed on the basis of informed consent.

All data we process is in accordance with the rules as laid down in statute, including the UK General Data Protection Regulations, the Data Protection Act 2018, the Education Acts, the Education and Skills Act 2008 and the Apprenticeship, Skills, Children and Learning Act 2009. We also follow statutory guidance as laid down in Keeping Children Safe in Education, in order to ensure that safeguarding is a primary concern for all in our learning community.

We use personal data about learners and parents to ensure that we fulfil our legal obligation to offer educational opportunities to our learners, and are able to look after the needs and requirements of everyone in our learning community. We use personal data about our staff to ensure that we can support them in offering teaching and learning and in their personal development.

Personal data we process about our learners and staff will include some basic details such as names, addresses, contact details and dates of birth. It may also include special categories of data including health information, ethnicity, and religion. We will always ask you if it's okay to record special categories of information, and you can say no without it affecting the services we provide for you, or the role you carry out for us.

Where we rely on consent to process personal data about individuals in our learning community, we ensure that we obtain that consent freely and in a positive manner. Anyone whose personal data is processed on the basis of consent can withdraw that consent easily and quickly.

### **Who will see your personal data**

We will only share your information with people who have a legal or operational reason to see it. For learners, this could include anyone directly involved in planning, providing or supporting educational opportunities. For parents, this could include anyone who needs to be involved in conversations about your child's progress at our schools.

All staff personnel files are held securely by the HR department, and are only available to the HR team and senior management. Personal data of volunteers will be held securely by the Head Teacher and will only be available to senior management.

Personal data about Local Schools Committee members and Trust Board members is held by the Clerk to the Trust. It is only available to the Clerk, and is kept in order to ensure that Alumnis complies with our legal obligations regarding Governance.

In certain circumstances, we may need to share information with partners including the Local Authority, Social Services or the Police. This will only be done where strictly necessary, and the information shared will be limited to what is appropriate to the specific circumstances.

When learners leave our schools and move to other settings, we send copies of their school files securely by electronic mail to their next setting. This will include the Educational Record, and any other information that has been put on file about the learner's progress within the school. Any safeguarding records or concerns will be sent securely to the Designated Safeguarding Lead. We will not keep copies of safeguarding files unless there are ongoing issues that we may need to be involved in. Where a child leaves our setting but does not start at a new setting – for example if they move outside the UK or become home-educated – we will pass all files to the Local Authority for secure storage and retention.

### **What data will be kept**

We are required to keep some personal data, even after you have left our learning community.

Any personal data that we are required to keep about learners is securely stored on an encrypted database, with limited access for staff. It will not be accessed except in response to a query about our actions in the education of a particular learner. No decisions will be made about you based on this data and you will not suffer any detriment or harm by having it stored on our secure systems.

We keep an overall summary of attainment and performance of learners in our school, in order to monitor trends in teaching and learning. This data is anonymised and does not allow us to identify individual learners, once they have left our learning community.

All staff are given a copy of the Policy outlining retention periods for information on their Personnel files. This includes how data is stored, who might access it, and when it will be securely destroyed.

Personal data about volunteers, Committee Members and Trustees may be retained to ensure that we comply with the regulations concerning safeguarding, and those outlining appropriate standards of governance. Retention periods will be appropriate to the nature of the role carried out for the Trust.

If we share information with the other agencies around safeguarding concerns, they will keep a record of that information. We will keep our copies of that information while you are a member of our learning community, and may retain copies for longer if it is necessary to ensure that we comply with relevant safeguarding legislation.

The collection of this information will benefit teaching and learning by:

- Helping us to design curriculum and activities to address need
- Ensuring we focus on continual improvement in teaching and learning
- Ensuring we train and support our staff in the areas that matter
- Tailoring our resources to the issues that matter most to our learning community

### **How we will contact you**

We will need to contact parents and learners for a range of reasons. We will only contact you on relevant school business. We will use the contact details that you provide to us as our main source of communication.

Our preferred means of communicating with parents is via email. We take all due care when sending information out to parents, to ensure that it is only seen by the intended recipients.

All members of Trust Governance are provided with an Alumnis email account, which includes access to a shared Google drive. We will expect all Trust business and communications to be conducted through this account and not through personal email accounts.

## **Seeing the information we hold about you**

You can ask to see a copy of all the information we hold about you. To do this, you can write to us or email us at [dpo@alumnismat.org](mailto:dpo@alumnismat.org) marked for the attention of the Data Protection Officer.

If we are processing your data on the basis of consent, you can withdraw that consent at any time. If you do, then we will delete the majority of the data we hold about you, retaining only the minimum information we need for our records and for our internal administration.

If you aren't happy with the way we use your data, or if you think that you have suffered harm or detriment as a result of how we have used or stored your data, you can make a complaint to the Information Commissioners Office.

## Appendix A

### 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 the numbers of children and their characteristics in each school.
- informs 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).
- supports 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

### *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>

### *The National Pupil Database (NPD)*

Much of the data about pupils in England goes on to be held in the National Pupil Database (NPD). The NPD is owned and managed by the Department for Education and contains information about pupils in schools 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 schools, local authorities and awarding bodies.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

### *Sharing by the Department*

The law allows the Department to share pupils' personal data with certain third parties, including:

- schools
- local authorities
- researchers
- organisations connected with promoting the education or wellbeing of children in England
- other government departments and agencies
- organisations fighting or identifying crime

For more information about the Department's NPD data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

Organisations fighting or identifying crime may use their legal powers to contact the DfE to request access to individual level information relevant to detecting that crime. Whilst numbers fluctuate slightly over time, the DfE typically supplies data on around 600 pupils per year to the Home Office and roughly 1 per year to the Police.

For information about which organisations the Department has provided pupil information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the police please visit the following website: <https://www.gov.uk/government/publications/df-external-data-shares>

*How to find out what personal information the DfE holds about you*

Under the terms of the Data Protection Act 2018, you are entitled to ask the Department:

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:

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

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