



# Privacy Notice

## How we use your information

### 2023/2024

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#### **Who are we?**

Shires Multi Academy Trust is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Shires Multi Academy Trust is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: Z7387577

You can contact Shires Multi Academy Trust as the Data Controller in writing at:

DPO - Warwickshire Legal Services/Shires Multi Academy Trust, PO Box 9, Shire Hall, Warwick, CV34 4RL or [schoolDPO@warwickshire.gov.uk](mailto:schoolDPO@warwickshire.gov.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?**

Please refer to Appendix A for details of information processed.

#### **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 assess the quality of our services
- to comply with the law regarding data sharing
- to safeguard pupils
- To share medical information with Public Health Authorities



We use Staff & Applicant data:

- assess your skills, qualifications and suitability for the role
- carry out background checks
- communicate with you about the process
- keep records
- comply with legal or regulatory requirements

We use Governor/Trustee Data:

- Fulfill statutory obligations
- Communicate relevant information to individuals or groups or Boards or Local Governing Bodies for the purpose of them carrying out their roles and responsibilities as a

### **Collecting information**

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

### **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 information in order to meet certain legal requirements and legal obligations placed upon us by law. Therefore we are required to process personal information for such purposes even if you have not consented to us doing so.

If you would like a copy of or further information regarding the statutory authorities that underpin our legal obligations, you should contact us 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.

#### **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.

#### **4) To perform a public task**

It is a day-to-day function of Shires Multi Academy Trust to ensure that individuals 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 staff are able to fulfil their role and responsibilities.



### **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 information with:

- Schools that pupils attend after leaving us
- Our local authority
- the Department for Education (DfE)
- Local Public Health team
- NHS
- Other schools within our Trust
- Information Management Systems: Sims / Arbor/ Scholarpack / Wonde
- Education / classroom apps
- Shires MAT HR staff (Staff, Applicants and Governors/Trustees)
- Companies House (Governors/Trustees only)
- Local Governing Bodies (Governors only)

We do not share personal information unless the law and our policies allow us to do so. Appropriate security measures have been put in place to prevent personal information being accidentally lost or used or accessed in an unauthorised way. Procedures are also in place deal with suspected data security breaches and you will be notified of a suspected breach where we have a legal obligation to do so.

Appendix B, details all partners with whom we currently share data.

### **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. The Shires Multi Academy Trust monitors the personal information it processes and will only share personal information with a third party if we have a legal basis to do so. We may share personal information about you with:

- Our local authority – to meet our legal duties to share certain information in terms of the Education act 2002, section 175, the Children’s Act 1989, section 17, 47 & 83 and the Children’s Act 2004, Section 11, dealing with safe-guarding concerns
- The Department for Education, central and local government, health and social welfare organisations, Educators and examining bodies (as required under Section 537A of the Education Act 1996, the Education Act 1996 s29), the Education (School Performance Information)(England) Regulations 2007, regulations 5 and 8 School Information (England) Regulations 2008, the Education (Pupil Registration) (England) (Amendment) Regulations 2013
- Your family and representatives to meet our legal obligation in terms of the Education (Pupil Information) (England) Regulations 2005, regulation 3 and 5.
- Ofsted to meet our legal obligations to share certain information in terms of the Education Act 1996, sections 537 & 537A and accompanying regulations.
- Suppliers and service providers – to provide the services we have contracted them for by public task and legal obligation.
- Health authorities in order to protect Vital Interest where the data subject is physically or legally incapable of giving consent.
- Professional advisers, bodies and consultants by legal obligation of the Education Act 2002, section 175, Children’s Act 1989, Section 17,47& 83 and the Children’s Act 2004, section 11.
- Charities and voluntary organisations, such as The Friends of Studley High School PTA, by consent
- Police forces, courts, tribunals by public task and legal obligation.
- All personal information for staff, applicants, governors and trustees is held in a manner which is compliant with Data Protection legislation. Personal information is only processed for the purpose it was collected. Shires Multi Academy Trust 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.

We have security measures in place to prevent your 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 Shires Multi Academy Trust complies with the Retention Schedules provided by the Information & Record Management Society Ltd. The schedules set out the Statutory Provisions under which the Academy Trust are required to retain the information. A copy of those schedules can be located using the following link:

[Records Management Policy](#)



### **Transferring data internationally**

If 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, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the School Data Protection Officer at Warwickshire Legal Services via email at [schooldpo@warwickshire.gov.uk](mailto:schooldpo@warwickshire.gov.uk) or alternatively:

Shires Multi Academy Trust 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 Shires Multi Academy Trust 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 academy trust processes your information with your consent, you have the right to withdraw your consent at any time. To exercise this right, please contact the school it relates to.

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 using the contact details above.

**Author: T Jordan 15/3/2022**

**Reviewed by: M Thake 07/02/2024**

**Review Date: February 2025**

## Appendix A

	Pupil	Parent	Staff	Applicant	Governor or Trustee
Name	✓	✓	✓	✓	✓
DOB	✓		✓	✓	✓
Unique Pupil Number	✓				
Occupation					✓
Health or medical information	✓	✓	✓	✓	
Characteristics such as ethnicity, language, nationality, country of birth.	✓		✓	✓	✓
Free school meal eligibility	✓				
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 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.	✓				
Photographs, recorded images, CCTV images (not by consent) and biometric data by consent	✓		✓		
Employment History			✓	✓	
Education			✓	✓	✓
Qualifications			✓	✓	✓
Training activities			✓	✓	✓
Current level of remuneration			✓	✓	
Referee Information			✓	✓	✓
DBS related information			✓	✓	✓
Business Interest					✓



## Appendix B

Third party data sharing list		
500 words competition	Funzone	PSHE Association
Academy 21	Future Youth Impact	Purple Mash/2 Simple
All websites - cookies	GCSE Pod	Redgate Sports
All-in language software	Get Information About Schools website	Renaissance
Aperture Photography	GL assessment	RS Assessments (Snap)
AQA	Glenn Mellor Counselling LTD	Salamander
Arbor MIS	Gloverspiece Mini Farm	School Cloud
ASDAN	Google apps for education	School Days
Astwood Smiles	Govenor Hub	School nurses
AU Sports	Green House	School Website
Avon Educational services Ltd	Hodder Education software	Schools Fruit & Veg scheme
B4BC	iCloud	Scolarpack
Birmingham City University	IRIS	Seesaw
Blackwell Adventure	Jackie Holmes	SEND Pathways ltd
Braisewick Photography	Jane Askew	SENSO
Bromsgrove & Redditch Trophies	JCA	Services 4 Schools
Caboodle Technology	Joan Mitchell	Severn Arts
Capita	Julie McDermot	Shires Catering
CCTV	Kapow	Shred It
Chadsgrove	Keith Jones	Single Central Record
Classcharts (Edukey Education Ltd)	Kerboodle	SISRA/Juniper
CLM	Kip Mcgrath	Social media check
CoConnect	Letterjoin	Social workers
Collins Ebooks	Liberata	Sonic Pi
Community policing agencies	Library management	Spag.com
Companies House	Lifespace	Sparx
Computershare	Local Government Authorities (LA's)	Staff Safe (CPOMS)
Concero	Local Government Pension Scheme	Stage Coach
Conerstone	Local newspapers (per agreed permissions)	Steves Private Hire
Cool Milk	Local Public Health Teams	Surf Photo
CPD various training facilities	Maths Circle Ltd	Sync
Cpoms	Medical tracking	Teachers Pensions Scheme
Cunninghams	Microsoft	Teachers to Parents
CWLEP	Mills Pyatt Chartered Accountants	Testwise
D&D	My Tutor	The Adventure Element
Department for Education	National College	The Aspire Academy
Discovery Education	Nautilus	The Forge AP
Dolphin tec	NCOP	Timelock Photography
DoubleStruck Ltd	NGA	Tinkerclad



Dr Caroline Doggett	No More Marking	Tour operators
DSP Photography	Noel Copeland	TTRS / Numbots
Duke of Edinburgh (The Awards Scheme)	NPQ program	Tudor Grange
Eden Red	Nutrition Program	Twinkle
Education Support	OCR	Unifrog
EduFocus	Online SCR	Vaccination UK
Edukey Education Ltd	Oxford Owl	Venture Outdoor
Edusites	PageOne	Welfare agencies
Eleanor Creed Miles	Papercut	Welfare Call Group Ltd
Entrust	Parago	White Rose Maths
Enviro Electronics	Parentpay	Whizkids (EduLife)
Epraise	PASSTAB	WJEC CBAC Ltd
Exeant	Pearson Edexcel	Wonde
FDC	PinPoint	Worcestershire Education Business Partnership
FFT	Pinterest	Work experience employer checks
FLT	Pixrl	Writers Toolbox
	Poetry Competition	Zigzag Education