

Kettering Buccleuch Academy

Data Privacy Policy

REVIEWED BY: Caroline Hodkin

DATE AGREED BY GOVERNORS: March 2019

DATE OF NEXT REVIEW: March 2020

This notice is intended to provide information about how the Academy will use or “process” personal data about individuals including current, past and prospective pupils and their parents, carers or guardians (referred to in this notice as “parents”).

Responsibility for Data Protection

The data controller for personal information held by Kettering Buccleuch Academy (KBA) is United Learning Trust (ULT). ULT is registered with the Information Commissioners Office (ICO). The registration number is Z7415170.

The Company Secretary, Steve Whiffen, is responsible for ensuring that ULT complies with the Data Protection Law. He can be contacted on company.secretary@unitedlearning.org.uk or 01832 864538.

KBA is responsible for ensuring that the Academy complies with ULT’s policies and procedures in relation to data protection. They can be contacted on 01536 515644.

The purpose for which we process pupil data and parent personal data.

KBA and United Learning Trust collect, create and hold personal information relating to our pupils and may also receive information about them from their previous school, local authority and /or the Department for Education (DfE). We also collect and hold personal information about our pupils’ parents and carers. We use this personal data to:

- Provide education services (including SEN), career services and extra-curricular activities to pupils; and to monitor pupils’ progress and educational needs.

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care.
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils at the school.
- To maintain relationships with alumni and the school community.
- For the purposes of management planning and forecasting, research and statistical analysis and to enable ULT to monitor the Academy's performance.
- To monitor use of the Academy's IT systems in accordance with the schools Acceptable Use Policy.
- To receive information about current and prospective pupils from any educational institution that they attended.
- To confirm the identity of prospective pupils and their parents.
- To make use of photographic images of pupils in school publications and on the school website in accordance with the Academy's policy on taking, storing and using images of children.
- To create invoices and process payments for services such as school meals, school trips etc.
- For security purposes, and for regulatory and legal purposes (for example child protection and health and safety) and to comply with its legal obligations.
- To receive reports from any external bodies who may be working with your child.
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the Academy.
- To keep you updated about the activities of the Academy including by sending updates and newsletters by email and post.
- To organise trips and visits both in the UK and abroad.

The categories of personal data that we process

The Types of personal data processed by the school will include:

1. Name, addresses, telephone numbers, email addresses and other contact details.
2. Academic records and national curriculum assessment results, including examination scripts and marks.
3. Personal characteristics such as ethnic group, religious beliefs, any special educational needs you may have and any relevant medical information.
4. Attendance information, behavioural records, any exclusion information.
5. Information provided by previous educational establishments on or other professionals or organisations working with pupils.
6. Where pupils go after they leave the Academy.
7. For pupils enrolling for post 14 qualifications, the Learning Records Service will give us the unique learner number (ULN) and may also give us details about your learning or qualifications.
8. Images captured by the Academy's CCTV system (in accordance with the school's policy on taking, storing and using images of children).

The legal basis for the processing of pupil and parent data

The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller and where necessary to comply with our legal obligations.

Information relating to racial or ethnic origin, religious beliefs or health (point 3) will only be processed with the explicit consent of the pupil or the pupil's parents. Further information regarding the purposes for which these data would be processed will be provided with the data collection form.

Data Retention Form

The pupils' educational record will move with the pupil to their next school. Where the school is the last school that the pupil attends the records will be kept until the pupil is 25 years old.

For further information on how long we keep personal data for please refer to our records retention schedule which can be found on the school's website.

Data Security

ULT has in place technical and organisational measures that ensure a level of security appropriate to the sensitive nature of the personal data that we process. For further information regarding how we keep personal data secure please refer to our security of personal data policy.

Data Processors

We use third party data processor to provide us with a management information system, accounts software, cloud storage services, apps and software for use in the classroom and to facilitate the secure transfer of data between the school and central office. This use of data processors will only take place if it is in compliance with the Data Protection Act 1998 and the General Data Protection Regulation.

Decisions on whether we contract with these third part processors are subject to a robust approval process and are based on a detailed assessment of the purpose for which the data processing is required, the level and sensitivity of data involved and the arrangements in place to store and handle data. To be granted access to pupil level data, data processor must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and retention and use of the data.

We currently use the following data processor:

Primary	Secondary	Sixth Form
<ul style="list-style-type: none"> • SIMS Parent App • Parents Evening Booking System • Teachers2Parents • Photography Company • Accelerated Reader • Entry Sign • CPOMS 		
<ul style="list-style-type: none"> • Classroom Monitor • Rising Stars • Renaissance Learning • Third Space Learning • Leonix Sound Training • Times Tables Rockstars • Teach Your Monster to Read • Nessy Learning Program • Tapestry 	<ul style="list-style-type: none"> • Show My Homework • Hegarty Maths • FFT Aspire • 4 Matrix • Science Tool – Merit • EdLounge 	<ul style="list-style-type: none"> • UCAS • NCOP • Employers • Universities / Colleges • Student Finance England • Prospects – Careers Service • 3AAA – Apprenticeships • Starting Off - Apprenticeships

Sharing Data with Third Parties (other data controllers)

We share data with the following recipients:

Keeping in touch and supporting the school

We would like to share pupil and parent personal data with both our Parent Teacher Association and our Alumni Association. We will only do so if you have signed the appropriate consent form, details of how these groups use your personal data are given on the consent form. Consent may be withdrawn at any point by writing to Data Protection Lead, Kettering Buccleuch Academy, Weekley Glebe Road, Kettering, NN16 9NS

Careers Guidance

We share pupil and parent personal data with Prospects, our designated careers advisory service. This includes information relevant to careers interviews or presentations. Destination data for students in Years 11, 12 and 13 is also shared including information that helps Prospects to work with students who are potential NEET. As and when appropriate, we share pupil information with career programme providers, apprenticeship providers, employers and colleges and universities relating to vacancies, student applications or their wider provision. This can be prior to a potential application having been made, once an application has been submitted or it can be to facilitate or enable pupils to access any specific programmes or activities these organisations are offering.

Unless there is a legal obligation to pass on pupil and/ or parent data, prior consent will be obtained in order to do so.

Where pupils and/or parents (as appropriate) have consented, we share data with NCOP to enable pupils to take advantage of the range of free opportunities this organisation offers.

References

We will provide references to any other educational institution that the pupil proposes to attend and to potential employers of past and present pupils.

School Inspections

On request we will share the academic records with inspectors from Ofsted.

Department for Education

We are required, by law, to pass some information about our pupils to the Department for Education (DfE). This information will, in turn, then be made available for use by the Local Authority.

DfE may also share pupil level personal data that we supply to them, with third parties. This will only take place where legislation allows it to do so and it is in compliance with the Data Protection Act 1998 and the General Data Protection Regulation.

Decision on whether DfE release this personal data to third parties are subject to a robust approval process and are 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 level data, requestors must comply with strict terms and conditions covering confidentiality and handling of data, security arrangements and retention and use of the data.

For more information on how this sharing process works, please visit:

<https://www.gov.uk/guidance/national-pupil-database-apply-for-a-data-extract>

For information which third party organisations (and for which project) pupil level data has been provided to, please visit: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

If you need more information about how our local authority and/or DfE collect and use your information, please visit:

- Our local authority at <http://www3.northamptonshire.gov.uk/councilservices/council-and-democracy/transparency/information-policies/Pages/data-protection.aspx>
- The DfE website at <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

We will not give information about our pupils to any other third parties without your consent unless the law and our policies allow us to do so.

Rights of the Data Subject

Data protection legislation gives individuals certain rights which are detailed below. If you wish to exercise these rights please contact, in writing, Caroline Hodkin (Systems and Information Manager) on carolinehodkin@kba.uk

Right of access to personal data “subject access request”

You have the right to access the personal data that the school holds about you. Requests need to be made in writing. If your child is over the age of 12 they will also need to sign the request. We take the security of personal data seriously, so we may ask you for proof of identity to verify that you are entitled to the information requested.

Right to withdraw consent

Where we have obtained your consent to specific processing activities you may withdraw this consent at any time.

Right to rectification

You have the right to have personal data that we hold about you rectified if it is inaccurate or incomplete. We will respond to such requests within one month.

Right to erasure

You have the right to have your personal data erased in certain specific circumstances. If you make such a request, we will consider whether the right to erasure applies and give you a full and reasoned response.

Right to restrict processing

In certain circumstances you have the right to request we restrict the processing of your personal data. If you make such a request, we will consider whether the right to restrict processing applies and give you a full and reasoned response.

For further information regarding these rights please refer to the Group’s rights of the data subject policy.

If you disagree with a decision that we have taken regarding the processing of your personal data please contact UCST’s Company Secretary, Steve Whiffen, on 01832 864538 or company.secretary@unitedlearning.org.uk

You also have the right to lodge a complaint with the Information Commissioners Office on 0303 123 1113 or <https://ico.org.uk/for-the-public/> .