



The Olympus Academy Trust Privacy Notice - Students

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On School Websites?	Yes

Amendment History

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v4.1	25 th February 2021	Head of Business Operations	<ul style="list-style-type: none"> • Update from Integra - policy amended to conform. <ul style="list-style-type: none"> • New paragraph added – 4.5 - 'collect and use pupil information' • New paragraph added – 7.2 - 'Youth Support Services (for pupils aged 13+)' added. • New Section added – 13 – Connecting Care • New Section added – 14 – West Child Health Information System (CHIS)
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v5.0	1 st April 2021		<ul style="list-style-type: none"> • Policy Issued

1. **How we use your information**

- 1.1 Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.
- 1.2 This privacy notice explains how we collect, store and use personal data about you. We, the Olympus Academy Trust, are the 'data controller' for the purpose of data protection law.

2. **The personal data we hold**

- 2.1 Personal data that we may collect, use, store and share (when appropriate) includes, but is not restricted to:
 - Contact details, contact preferences, date of birth, identification documents.
 - Results of internal assessments and externally set tests.
 - Learner and curricular records.
 - Characteristics, such as ethnic background, eligibility for free school meals, or special educational needs.
 - Exclusion information.
 - Details of any medical condition, including physical and mental health.
 - Attendance information.
 - Safeguarding information.
 - Details of any support received, including care packages, plans and support providers.
 - Photographs.
 - CCTV images captured in school.
- 2.2 We may also hold data about you that we have received from other organisations, including other schools, local authorities and the Department for Education.

3. **Why we use this data**

- 3.1 We use this data to:
 - Support learning.
 - Monitor and report on progress.
 - Provide appropriate pastoral care.
 - Protect student welfare/ wellbeing.
 - Assess the quality of our services.
 - Administer admissions waiting lists.
 - Carry out research.
 - Comply with the law regarding data sharing.
 - Provide services.

4. **Our legal basis for using this data**

4.1 We only collect and use your personal data when the law allows us to. Most commonly, we process it where:

- we need to comply with a legal obligation;
- we need it to perform an official task in the public interest.

4.2 Less commonly, we may also process personal data in situations where:

- we have obtained consent to use it in a certain way;
- we need to protect the individual's vital interests (or someone else's interest).

4.3 Where we have obtained consent to use your personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

4.4 Some of the reasons listed above for collecting and using personal data overlap, and there may be several grounds which justify our use of this data.

4.5 We collect and use pupil information under section 537A of the Education Act 1996, section 83 of the Children Act 1989, The Data Protection Act 2018 and The UK General Data Protection Regulation including Article 6 'Lawfulness of processing' and Article 9 'Processing of special categories of personal data'.

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>

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

5. **Collecting Information**

5.1 While the majority of information we collect is mandatory, there is some information that can be provided voluntarily.

5.2 Whenever we seek to collect information from you, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

6. **How we store this data**

6.1 We keep your personal information while you are attending our school. We may also keep it longer if this is necessary in order to comply with our legal obligations. Our record retention procedure sets out how long we keep information.

6.2 If you would like to request a copy of our record retention schedule, please contact the Data Protection Officer.

7. **Data Sharing**

7.1 We do not share information with any third party without consent unless the law and our policies allow us to do so.

7.2 Where it is legally required or necessary (and it complies with data protection law), we may share your personal information with:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions.
- The Department of Education.
- The students' family and representatives.
- Educators and examining bodies.
- Our regulator (Ofsted).
- Suppliers and service providers – to enable them to provide the service we have contracted them for (e.g. sending text messages, making payments etc).
- Financial organisations.
- Central and local government.
- Our auditors.
- Survey and research organisations.
- Health authorities.
- Security organisations.
- Health and social welfare organisations.
- Professional advisers and consultants.
- Charities and voluntary organisations.
- Police forces, courts, tribunals.
- Professional bodies.
- Youth Support Services (for pupils aged 13+)

This list is not exhaustive.

8. **National Pupil Database (NPD)**

8.1 We are required to provide information about students to the Department for Education as part of statutory data collections such as the school census.

8.2 Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the Department and provides evidence on school performance to inform research.

8.3 The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

- 8.4 The Department for Education may share information from the NPD with other organisations which promote children’s education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data. Please refer to Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013 for further information.
- 8.5 All data is transferred securely and held by DfE under a combination of software and hardware controls, which meet the current government security policy framework. For more information, see the department’s webpage on how it collects and shares research data.
- 8.6 You can also contact the Department for Education with any further questions about the NPD.

9. The Local Authority

- 9.1 We may be required to share information about our pupils with the local authority to ensure that they can conduct their statutory duties under the Schools Admission Code, including conducting Fair Access Panels.

10. Youth Support Services

- 10.1 Once students reach the age of 13, we are legally required to pass certain information about them to South Gloucestershire Council local authority or Youth Support Services as it has legal responsibilities regarding the education of training of 13 – 19 year-olds under section 507B of the Education Act 1996.
- 10.2 This information enables it to provide youth support services, post 16 education and training services, and careers advisers.
- 10.3 Parents/carers, or students once aged 16 or over, can contact our Data Protection Officer to request that we only pass the individual’s name, address and date of birth to South Gloucestershire Council local authority or Youth Support Services.

11. Transferring Data Internationally

- 11.1 Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

12. Parents’ and Students’ Rights Regarding Personal Data

- 12.1 Individuals have a right to make a ‘subject access request’ to gain access to personal information that the school holds about them.

12.2 Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

12.3 If you want to make a request please contact our Data Protection Officer.

13. **Connecting Care**

13.1 Your local council is a partner in Connecting Care, a project which links social care information with health information.

13.2 The Connecting Care Local Record is a new way for staff who are directly involved in a child's care to share relevant information about their care in a way that is secure, controlled, consistent and efficient. It allows health and local council staff who are directly involved in a child's care access to a summary of existing records, such as those held by the GP, hospital or social care provider.

13.3 Staff who are directly involved in a child's care, will only access their record with a legitimate reason, and if they can, they will ask your permission before they look at it.

13.4 The Connecting Care Record will contain information such as:

- who is involved in a child's care;
- any allergies they have;
- medications;
- recent appointments (but only whether they were attended, this will not include any information about what was discussed at that appointment);
- diagnoses.

13.5 The Connecting Care record will not contain information about conversations with the GP or any information on sensitive subjects such as sexual health. Staff who have a responsibility for designing services to improve children's general well-being will also have access to relevant information from the record. The detail that staff can see is linked to the job they do. If for their job they don't need to see specific information, they cannot see it.

13.6 Connecting Care has been established in order to share important health and social care information to support the care of the wider Bristol population. Your contact with local Connecting Care NHS Partner Organisations may result in them seeking your consent to participate in a research study. Where you have consented to participate in such a study, the research team may access the information held by GPs and Hospital Trusts through Connecting Care to ensure that your participation (or those that you are responsible for) will not put you at risk of increased harm, and is suitable for the aims of the study. If you later choose to withdraw from the study, the research team will discuss the use of your information with you. As part of the consent process, the research team will inform you of the information they would seek access to.

13.7 If you require further information about Connecting Care, how it works, how information is shared and protected, and how you can opt out (and the implications for doing so) please contact PALS on 0800 073 0907, or visit <https://www.connectingcarebnssg.co.uk>

14. **West Child Health Information System (CHIS)**

14.1 Your local council also shares a limited amount of school enrolment information with the South West Child Health Information System (CHIS), which is used by local organisations to deliver child health services safely, effectively and efficiently. The CHIS maintains a record of all children from birth up to the age of 19 and receives data from General Practice, maternity departments, health visitor providers, screening providers and school age vaccination providers.

14.2 The information shared by the school with CHIS includes:

- School assigned ID and/or NHS number
- Pupil name and gender
- Pupil date of birth
- Pupil home postcode
- Pupil start date at the school

14.3 The CHIS is commissioned by NHS England on behalf of Public Health England and the service is provided by Health Intelligence Ltd. If you require further information about the CHIS, how it works and how information is shared and protected, please visit: <http://www.swchis.co.uk>

15. **Other Rights**

15.1 Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress.
- Prevent it being used to send direct marketing.
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person).
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing.
- Claim compensation for damages caused by a breach of the data protection regulations.

15.2 To exercise any of these rights, please contact the data co-ordinator for the relevant school, please see below.

16. Complaints

- 16.1 We take any complaints about our collection and use of personal information very seriously.
- 16.2 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.
- 16.3 To make a complaint, please contact the data co-ordinator for the relevant school, contact details can be found below.

Alternatively, 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:

The Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

17. Contact Us

- 17.1 If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact the data co-ordinator for your school:

Abbeywood Community School	Catherine Thompson	info@abbeywoodschoool.com
Bradley Stoke Community School	Fran Bolshaw	admin@bradleystokecs.org.uk
Patchway Community School	Allison Anstey	pcsenquiries@olympustrust.co.uk
Winterbourne Academy	Charlie Peake	office@winterbourneacademy.org.uk

The appointed Data Protection Officer is Carole Browne, info@integra.co.uk

APPENDIX 1

How 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 DfE to request access to individual level information relevant to detecting that crime. Whilst numbers fluctuate slightly over time, 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 the Home Office and the Police, please visit the following website:

<https://www.gov.uk/government/publications/dfе-external-data-shares>

How to find out what personal information DfE hold 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.
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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 DfE: <https://www.gov.uk/contact-dfe>