



Privacy Notice for Pupils

Approved by:	Mohammed Ummar Azam -Chair of Governors
Reviewed by:	Laura Webb - Governor
Last reviewed:	August 2023
Next review:	August 2024

1. Introduction

You have a legal right to be informed about how our school uses any personal information that we hold about you. To comply with this, we provide a 'privacy notice' to you where we are processing your personal data.

This notice explains how we collect, store and use personal data about **pupils at our school**, like you.

We, Excellence Girls Academy (Excellence Academy Girls School Ltd.), are the 'data controller' for the purposes of UK data protection law.

Our Data Protection Officer (DPO) is Laura Webb (see 'Contact us' below).

2. The personal data we hold

We hold some personal information about you to make sure we can help you learn and look after you at school.

For the same reasons, we get information about you from some other places too – like other schools, the local council and the government.

Personal information that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Your contact details
- Your test results
- Your attendance records
- Details of any behaviour issues or exclusions

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to:

- Information about your characteristics, like your ethnic background or any special educational needs
- Information about any medical conditions you have
- Photographs and CCTV images

3. Why we use this data

We use the data listed above to:

- a) Get in touch with you and your parents when we need to
- b) Check how you're doing in exams and work out whether you or your teachers need any extra help
- c) Track how well the school as a whole is performing
- d) Look after your wellbeing

3.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you messages by email or text promoting school events, campaigns, charitable causes or services that you might be interested in.

You can take back this consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

3.2 Use of your personal data in automated decision making and profiling

We don't currently put your personal information through any automated decision making or profiling process. This means we don't make decisions about you using only computers without any human involvement.

If this changes in the future, we will update this notice in order to explain the processing to you, including your right to object to it.

4. Our lawful basis for using this data

We will only collect and use your information when the law allows us to. We need to establish a 'lawful basis' to do this.

We only collect and use personal information about you for data for the purposes listed in section 3 when the law allows us to, as per the [ICO's guidance on the lawful basis for processing](#).

Most commonly, we use it where we need to:

- Comply with a legal obligation
- Carry out a task in the public interest
- Where we have legitimate interests in processing the data – for example, the use of photographs to enable us to clearly identify you in the event of an emergency evacuation

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

Where you've provided us with consent to use your information, you may take back this consent at any time. We'll make this clear when requesting your consent, and explain how you'd go about withdrawing consent if you want to.

4.1 Our basis for using special category data

For 'special category' data (more sensitive personal information), we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your information in a certain way
- We need to use your information under employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The information has already been made obviously public by you
- We need to use it to make or defend against legal claims
- We need to use it for reasons of substantial public interest as defined in legislation
- We need to use it for health or social care purposes, and it's used by, or under the direction of, a professional obliged to confidentiality under law
- We need to use it for public health reasons, and it's used by, or under the direction of, a professional obliged to confidentiality under law
- We need to use it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the use is 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 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 obviously public by you
- We need to use it as part of legal proceedings, to obtain legal advice, or to make or defend against legal claims
- We need to use it for reasons of substantial public interest as defined in legislation

5. Collecting this data

While most of the information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we want to collect information from you, we make it clear if you have to give us this information (and if so, what the possible consequences are of not doing that), or if you have a choice.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local councils
- Government departments or agencies
- Police forces, courts, tribunals

6. How we store this data

We keep personal information about you while you're attending our school. We may also keep it beyond your attendance at our school if this is necessary. Our data retention schedule sets out how long we keep information about pupils and is available to view upon request.

We have security measures in place to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We'll dispose of your personal data securely when we no longer need it.

7. Who we share data with

We don't share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it's legally required, or necessary (and it complies with UK data protection law), we may share personal information about you with:

- **Our local authority (Stoke-on-Trent)** – to meet our legal duties to share certain information with it, such as concerns about pupils' safety and exclusions
- **The Department for Education (a government department)** – we share data with the Department for Education on a statutory basis. We are required to share information about you with the (DfE) under regulation 5 of The Education (Information about Individual Pupils) (England) Regulations 2013 (More information about the National Pupil Database below).
- **Your family and representatives** – to enable us to contact others in the event of an emergency (we will assume that you have checked with the individuals before you supply their contact details to us)
- **Educators and examining bodies** – to deliver and administer your education, record the details of your studies (including and placements with external organisations), and determine /confirm your academic achievements (e.g. results, prizes). We need to tell the appropriate teachers if you are allergic to something or might need extra help with some tasks.
- **Our regulator** (the organisation or "watchdog" that supervises us, Ofsted) – to monitor the school's performance and to intervene or assist with incidents as appropriate. Ofsted uses information about the progress and performance of pupils to help inspectors evaluate the work of schools, to assist schools in their self-evaluation, and as part of Ofsted's assessment of the effectiveness of education initiatives and policy. Ofsted also uses information about the views of children and young people, to inform children's services inspections in local authority areas.
- **Suppliers and service providers** – so that they can provide the services we have contracted them for.
- **Financial organisations** – to administer the financial aspects of your relationship with us and any funders.
- **Central and local government** – to give and receive information and references about past, current and prospective pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend and to provide reference to potential employers of past students.
- **Health authorities** – We need to share information about your health and wellbeing with the NHS, Department of Health, the school nurses, immunization team, school GP, Public Health etc... to safeguard and promote pupil health and welfare, prevent the spread of infections, and to protect against life threatening diseases some of which may pose a public health concern. The NHS also use information about you for research and statistical purposes, to monitor the performance of local health services and to evaluate and develop them.
- **Security organisations** – to operate security (including CCTV) in accordance with the school's CCTV policy; and where otherwise reasonably necessary for the school's purposes, including to obtain professional advice and insurance for the school
- **Health and social welfare organisations** – to safeguard your welfare and provide appropriate pastoral (and where necessary, medical) care, and take appropriate action in the event of an emergency, incident or accident, including by disclosing details of your medical condition where it is in

your interest to do so: for example, for medical advice, social services, insurance purposes or to organisers of school trips;

- **Professional advisers and consultants** – to assist the school in fulfilling its obligations and to help the school run properly. We might need to share your information with them if this is relevant to their work.
- **Police forces, courts, tribunals** – to fulfil and monitor our responsibilities under equalities, immigration and public safety legislation. We will need information about any court orders or criminal matters which relate to you. This is so that we can safeguard your welfare and wellbeing and the other pupils at the school. We need to share information with the police or our legal advisers if something goes wrong or help with an enquiry. For example, if one of your classmates is injured at school or if there is a burglary.
- **Professional bodies** – in accordance with Data Protection Law, some of the school's processing activity is carried out on its behalf by third parties, such as IT systems, web developers and cloud storage. Where possible this is subject to contractual assurances that personal data will be kept securely and only in accordance with the schools' specific direction.

National Pupil Database

We have to provide information about you to the Department for Education (a government department) as part of data collections such as the school census.

Some of this information is then stored in the [National Pupil Database](#), which is managed by the Department for Education and provides evidence on how schools are performing. This, in turn, supports research.

The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards and others.

The Department for Education may share information from the database with other organisations, such as organisations that promote children's education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data.

You can find more information about this on the Department for Education's webpage on [how it collects and shares research data](#).

You can also [contact the Department for Education](#) if you have any questions about the database.

7.1 Transferring data internationally

We may share personal information about you with the following international third parties, where different data protection legislation applies:

For example:

- Other schools or educational establishments
- Government departments or agencies
- Security organisations
- App or cloud server providers

For each of above, we transfer data on the basis of an adequacy regulation (previously named 'adequacy decision') by the UK government.

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

8. Your rights

8.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (unless there's a really good reason why we shouldn't):

- Give you a description of it
- Tell you why we are holding and using it, and how long we will keep it for
- Explain where we got it from, if not from you
- 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 (decisions made by a computer or machine, rather than by a person), and any consequences of this
- Give you a copy of the information in an understandable form

You may also have the right for your personal information to be shared with another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

8.2 Your other rights regarding your data

Under UK data protection law, you have certain rights regarding how your personal information is used and kept safe. For example, you have the right to:

- Say that you don't want your personal information to be used
- Stop it being used to send you marketing materials
- Say that you don't want it to be used for automated decisions (decisions made by a computer or machine, rather than by a person)
- In some cases, have it corrected if it's inaccurate
- In some cases, have it deleted or destroyed, or restrict its use
- Withdraw your consent, where you previously provided consent for your personal information to be collected, processed and transferred for a particular reason
- In some cases, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation if the data protection rules are broken and this harms you in some way

To exercise any of these rights, please contact us (see 'Contact us' below).

9. 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 concerns about our data processing, please let us know first.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

10. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **Data Protection Officer (DPO)**, Laura Webb, via dpo@excellencegirlsacademy.co.uk.