

## **Privacy Notice for Pupils on roll at CCSA**

### **1. Introduction**

You have a legal right to be informed about how our trust uses any personal data 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 schools** like you.

Birmingham Diocesan Multi-Academy Trust is the “data controller” for the purposes of UK data protection law.

Birmingham Diocesan Multi-Academy Trust Schools where this policy may apply:  
**Christ Church, Church of England Secondary Academy (CCSA)- Yardley Wood**

We are an education organisation, and our contact details are:

Address:	BDMAT Central Office, Christ Church, Church of England Secondary Academy, Daleview Road, Yardley Wood, Birmingham, B14 4HN
Email:	<a href="mailto:enquiries@bdmat.org.uk">enquiries@bdmat.org.uk</a>
Telephone	0121 828 3523

### **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 other places too – like other schools, the local council, and the government.

The personal information that we collect, hold and share includes:

- Your contact details
- Your attendance records.
- Your test results, details about your learning and what you have achieved at school.
- Details of any behaviour issues or suspensions
- Safeguarding information
- Information about how you use school computers and other IT and communication systems.

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

- Medical Information
- Photographs
- CCTV images captured in school
- Special Educational Needs information (such as diagnosis if any, support in place, professionals involved, assessment of need)
- Characteristics (such as ethnicity, language, nationality, country of birth and free meal eligibility)
- Recordings of online streaming of remote learning if applicable

We may also hold data about you that we have received from other organisations, including other schools and local authorities

### **3. Why we use this data**

We use the data listed above:

- a) To support your learning, including remote learning online if applicable
- b) To contact you and your parents/carers when we need to.
- c) To monitor and report on your progress.
- d) To check on how you are doing in exams and work out whether you or your teachers need any extra help
- e) To look after your well-being and keep you safe
- f) Make sure our computers and other school systems are used appropriately, legally and safely
- g) To track how well the school is performing as a whole
- h) To answer your questions and complaints
- i) To publish statistics, for example, about the number of pupils in schools
- j) To meet legal requirements placed upon us

We will only use your personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for any other reason and that reason is incompatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis that allows us to do so.

Please note that we may process your personal information without your knowledge or consent in compliance with the above rules where this is required or permitted by law

### **Use of your personal data in automated decision making and profiling**

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

### **Use of your personal data for filtering and monitoring purposes**

While you're in school, we may monitor what material you access on our computers and other IT and communication systems. We do this so that we can:

- Comply with health and safety law and other laws
- Comply with our policies (e.g. child protection policy, IT acceptable use policy)
- Keep our network(s) and devices safe from people who aren't allowed to access them, and prevent harmful software from damaging our network(s)
- Protect your welfare

## **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.

Our lawful bases for processing your personal information for the reasons listed in the "**Why we use this data**" section above are:

For the purposes of a) b) e) and h) from the section "**Why we use this data**" in accordance with the "Legal Obligation" basis – we need to process personal data to meet our responsibilities under law as set out here– The Children Acts of 1989 and 2004 and Keeping Children Safe in Education and Working Together to Safeguard Children

For the purposes of a) b) c) d) e) and f) from the section "**Why we use this data**" in accordance with the "public task" basis – we need to process personal data to fulfil our statutory function as a school as set out here: The Education Act 1996 requires that schools operate and that children in England and Wales aged five to 16 receive full-time education.

For the purposes of g) from the section **“Why we use this data”** in accordance with the “Legal Obligation” basis – we need to process personal data to meet our responsibilities under law as set out here: UKGDPR and Data Protection Act 2018

For the purposes of a) d) and f) from the section **“Why we use this data”** in accordance with the “Legitimate Interests” basis - where there is a minimal privacy impact, and we have a compelling reason including:

- where we let out school facilities, arrange or facilitate after-school or extra-curricular activities, or sporting events not part of taught sports in the school.
- Where we engage with third parties to provide resources for your learning (see **Who we share data with** section)

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

We have obtained consent to use it in a certain way, for example your consent to use your photographs for display purposes.

Where you have provided us with your consent to use your personal data, this consent can be taken back at any time. We will make it clear when we ask for your consent and explain how your consent can be withdrawn if you want.

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

### **Our basis for using special category data**

For ‘special category’ data, 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 personal data 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 data concerned has already been made obviously public by you
- We need to use it to make or defend against legal claims

- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process 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 process 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 process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing 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**

Whilst most of the information we collect about you is mandatory, (you have to give us this information) there is some information that can choose whether or not to give us..

Whenever we want to collect information from you, we make it clear if you have to provide 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 authorities
- Government departments or agencies
- Police forces, courts, tribunals
- Your parents
- Your previous school(s)
- Department for Education

## **6. How we store this data**

We keep personal information about you while you are attending one of our schools. We may also keep it after you stop attending one of our schools, if this is necessary to comply with our legal obligations or to meet our regulatory requirements.

We hold pupil data in line with our data retention guidelines, which can be found on the BDMAT website [Records-Management-Policy-and-Retention-Schedule-2024-25.pdf](#) and a copy is available via this link.

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 will dispose of your personal data securely when we no longer need it.

## **7. Who we share data with.**

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

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

- Schools/academies that you attend either before you join us or after leaving us; to assist them in discharging their legal duties.
- Our local authority, Birmingham; to meet our legal obligations such as safeguarding concerns and exclusions
- Other local authorities; to share information if you should move out of the area
- The Department for Education (DfE); for statutory returns
- Your family and representatives; in order to confirm attendance/registration at school and query or check accuracy of data they have provided.
- Auditors: to ensure schools are accessing all funding due to them and to comply with legislation such as the Academes Handbook.
- Educators and examining bodies – to support pupil eLearning and assessment
- Our regulator – Ofsted
- Survey and research organisations
- Our youth support services provider
- Financial organisations
- Security organisations
- Health Authorities; to assist them in discharging their legal duties
- Health and welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisation

- Police forces, courts and tribunals
- School nurses; to assist them in discharging their legal duties
- Suppliers and service providers – to enable them to provide the service we have contracted them for. For example:
  - ✓ Outsourced provider for school meals and allergy control – Sodexo, School Food United, Blue Runner.
  - ✓ Outsourced provider for Management Information System which stores pupil data – Arbor
  - ✓ Outsourced provider for educational visits, first aid and administration of medicine records - Evolve
  - ✓ Outsourced provider for safeguarding monitoring of all pupils – CPOMs
  - ✓ Outsourced providers for pupils learning in the curriculum such as Karboodle,

### **Sharing data with the Department for Education (DfE)**

We have to share information about you with the Department for Education (a government department) either directly or via our local authority, via various statutory data collections, for example school census and attendance.

The data shared will be in line with the following legislation:

- Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013
- Section 537A of the Education Act 1996 (as amended)
- Education (Information About Individual Pupils) (England) Regulations 2013 (as amended, including by the Education (Information About Individual Pupils) (England) (Amendment) Regulations 2024)
- Section 99 of the Childcare Act 2006 (CA 2006)
- The Childcare (Provision of Information About Young Children) (England) Regulations 2009 (the 2009 Regulations)

The data is transferred securely and held by the Department for Education under a combination of software and hardware controls that meet the current government security policy framework.

The data we share about you with the Department for Education is used for a number of different purposes, including to:

- Help decide the amount of money that our school receives

- o Monitor how well the education system is working and how well our school is doing in terms of educating our pupils
- o Support research

The information shared with the Department for Education about you could include:

- o Your name and address
- o Your unique pupil number
- o Pupil matching reference numbers
- o Details of your gender or ethnicity
- o Details of any special educational needs (SEN)
- o Details of schools attended
- o Absence and exclusion information
- o Information relating to exam results
- o Information relating to any contact with children's services
- o What you have done since finishing school

Please note: this list is not exhaustive.

Once pupils in our schools reach the age of 13, we are legally required to pass on certain information to the local authority or youth services provider, which has responsibilities regarding the education or training of 13- to 19-year-olds under section 507B of the Education Act 1996. Parents/carers, or pupils if aged 16 or over, can request that only their name, address and date of birth be passed to these agencies by informing the data protection officer (DPO).

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

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

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.

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.



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

For more information, see the Department’s webpage on [how it collects and shares research data](#).

You can also [contact the Department for Education](#) with any further questions about the NPD.

### **Transferring data internationally**

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

- 3P (Mathletics) has its main data location as the East US 2 region within Microsoft Azure. In accordance with EU GDPR requirements, Microsoft Azure complies with both the EU-US privacy shield and EU Model Clauses.
- The Schoolcomms Products and Services only processes personal information in the UK. Some supporting services (EG Microsoft CRM), might use cloud platforms that operate from Third Countries outside of the EEA. Where this is the case, Schoolcomms ensure that adequate safeguards are established to protect your data.
- Class Dojo complies with the requirements set forth in the EU-U.S. and Swiss-U.S. Privacy Shield.

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

## **8. Your Rights**

### **How to access to personal information that we hold about you- Subject Access Request (SAR)**

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 is a really good reason why we should not):

- 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 (decisions made by a computer or machine rather than by a person) is being applied to the data, 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).

Subject access requests can be made verbally. To ensure that your verbal request is fully understood the Information Commissioners Office (ICO) on their website say the following:

*Yes. You can make a subject access request verbally, but we recommend you put it in writing if possible because this gives you a record of your request.*

*If you are making a verbal request, try to:*

- *use straightforward, polite language;*
- *focus the conversation on your subject access request;*
- *discuss the reason for your request, if this is appropriate – work with the school or MAT to identify the type of information you need and where it can be found;*
- *ask the school or MAT to make written notes – especially if you are asking for very specific information; and*
- *check their understanding – ask them to briefly repeat back your request and tell them if anything is incorrect or missing before finishing the conversation.*

*However, even if you make your request verbally, we recommend you follow it up in writing (eg by letter, email or using a standard form).*

So, to avoid confusion we ask you when making a subject access request, you do so by contacting our Data Protection Officer, Michele Fullwood, in writing to Birmingham Diocesan Multi-Academy Trust, BDMAT Central Office, Christ Church, Church of England Secondary Academy, Daleview Road, Yardley Wood, Birmingham, B14 4HN or by email to [dpo@bdmat.org.uk](mailto:dpo@bdmat.org.uk)

## **Your other rights regarding your data**

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

- Say that you do not want your personal information to be used
- Object to the processing of personal data that is likely to cause, or is causing, damage or distress
- Stop it being used to send you marketing materials.
- Say that you do not 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 is inaccurate
- In some cases, have it deleted or destroyed or restrict its use
- Withdraw your consent, where you have previously provided it for collection, processing and transfer of your personal data for a particular reason.
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office if you feel we have not used your information in the right way
- Claim compensation if the Data Protection Regulations are broken and this harms you in some way.

We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:

- Your right to have all personal data deleted or destroyed doesn't apply when the lawful basis for processing is legal obligation or public task
- Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests
- Right to object to the use of your private data doesn't apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent

See information on types of lawful basis in section 4 of this privacy notice.

To exercise any of these rights, please contact us (see "Contact us" section)

## 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 concern about our data processing, please let us know first. You can make a complaint to us at any time by contacting our Data Protection Officer, Michele Fullwood, in writing at Birmingham Diocesan Multi-Academy Trust, BDMAT Central Office, Christ Church, Church of England Secondary Academy, Daleview Road, Yardley Wood, Birmingham, B14 4HN or by email [dpo@bdmat.org.uk](mailto:dpo@bdmat.org.uk)

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, or concerns, or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer, Michele Fullwood, in writing at Birmingham Diocesan Multi-Academy Trust, BDMAT Central Office, Christ Church, Church of England Secondary Academy, Daleview Road, Yardley Wood, Birmingham, B14 4HN or by email at [dpo@bdmat.org.uk](mailto:dpo@bdmat.org.uk)

## Last Updated

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was reviewed on **01 January 2025**