



Privacy Notice for Pupils and Parents

This notice is to let you know how Venturers Trust (and all of its associated academies) will collect, use and process personal data as a Data Controller. It is also designed to let you know your rights and what you can do if you have questions about personal data. This document sets out the types of personal data (meaning information about an individual from which that individual can be identified) we process, the purpose of processing the personal data and any recipients of the personal data we process.

In some cases, your personal data will be outsourced to a third party processor. This will only be done with your consent, unless the law requires the Trust to share your data or it is necessary for us to do so as part of performing our functions to provide education. Where the school outsources your data to a third party processor, the Trust will obtain assurance from the processor that they will comply with their relevant legal obligations.

Our Details

We are Venturers Trust. Our registered office is Venturers Trust, [Here] Bath Road, Arnos Vale, Bristol, England, BS4 3AP.

The Data Protection Officer (DPO) for the Venturers Trust is Tony Sheppard. Their role is to oversee and monitor the Trust's data protection procedures and to ensure they are compliant with relevant legal requirements (including the General Data Protection Regulation - GDPR). The DPO can be contacted on +44 (0)20 3961 0110 or dpois@gdpr.school

Why Personal Data is Collected

Venturers Trust collect and process personal data relating to our pupils and their families and may also receive information about the pupils from their previous schools, the Local Authority (LA), the Department for Education (DfE) and other bodies linked to pupils' development and welfare. We may share personal data with other agencies as necessary under our legal duties or otherwise in accordance with our duties/obligations as a Multi-Academy Trust.

Below are set out the reasons why we collect and process personal data in relation to the legal reasons set out in the Education Act 1996 and Education Regulations 2013.

- To support our pupils' learning
- To monitor and report on pupil progress
- To provide appropriate pastoral care
- To assess the quality of our educational service
- To comply with the law regarding data sharing
- To safeguard pupils

Legal Basis for Processing

The lawful basis for us to collect/process this Personal Data is in order to provide education in accordance with statute law (such as the Education Act 1996 and other legislation), our funding agreements with the Secretary of State, our memorandum and articles of association and other guidance provided for in law.

We also process Personal Data where processing is necessary for the performance of tasks carried out in the public interest. It is in the public interest to provide educational services to our pupils and to offer extra-curricular activities such as reading sessions and afterschool clubs to benefit the personal and academic growth of our pupils.

In addition, Personal Data will be collected and/or processed for the purposes of relevant contracts for the provision of services which are paid for. This may include but is not limited to:

- the provision of music tuition;
- school trips;
- entering students for examinations.

We do not process any special categories of Personal Data except where necessary for reasons of substantial public interest in complying with legal obligations including under the Equality Act 2010 or where necessary to protect the vital interests of the Data Subject or of another natural person and where safeguards are in place to ensure that this Personal Data is kept secure.

Special categories of data means Personal Data revealing:

- racial or ethnic origin;
- political opinions; religious or philosophical beliefs or trade union membership;
- genetic or biometric data that uniquely identifies you;
- data concerning your health, sex life or sexual orientation; or
- data relating to criminal convictions or offences or related security measures.

Further Personal Data including special categories of Personal Data may be collected and/or processed where consent has been given (for example, school photographs for non-educational purposes). If consent is the only legal basis for processing and has been given then this may be revoked in which case the Personal Data will no longer be collected/processed.

Categories of Data Collected

The categories of pupil personal data the Trust collects, holds and shares includes the following listed below.

- Name and contact details
- Date of birth
- Health and/or any other relevant medical information
- Information in connection with education, including, but not limited to;
 - unique pupil numbers;
 - test results;
 - other records.
- Attendance information
- Behavioural and disciplinary information
- Free school meal eligibility
- Personal characteristics, such as;
 - nationality and ethnic group;

- religion;
- first language;
- any special educational needs;
- any relevant protected characteristics.

Whilst the majority of the data we collect is mandatory, some of it is provided to us on a voluntary basis. When collecting data, the academy will inform you whether you are required to provide the data or if your consent is needed. Where consent is required, the academy will provide you with specific and explicit information with regards to the reason the data is being requested and how the data will be used.

How Long Data is Kept For

Any personal data relating to pupils in any of the academies of Venturers Trust and their families is stored in accordance to the Venturers Trust's GDPR Policy and Data Retention Policy.

In accordance with the GDPR, Venturers Trust does not store data indefinitely – the data is only stored for as long as is necessary to complete the task for which the data was originally collected.

How Data Will Be Processed

Pupil and their family personal data may be processed in a variety of ways; this will include, but is not limited to;

- maintaining written records for educational purposes;
- medical or allergy information;
- identification;
- communications, for example e-mails or text messaging;
- adding to internal documents, for spreadsheet documents or similar, for the purposes of assessing personal data;
- for educational software use (this could be for the purposes of helping children learn, behaviour management, reports and other educational purposes).

Where Data is Stored and How Data is Kept Secure

All information you provide to us is stored securely. Where we have given you - or where you have chosen - a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. You must not share your password with anyone.

When giving personal data to third parties, for example software providers, it is possible that this personal data could be stored in a location outside of the European Economic Area (EEA). We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with the Venturers Trust privacy policy. In particular, any transfer of your personal data made by us to a location outside of the EEA will be governed by clauses in a written contract in order to keep these secure.

Third-Party Information Sharing

Pupils' data will not be shared with third-parties without consent unless we are required by our legal obligations or our policies. We will disclose information to third-parties;

- if we are under a duty to disclose or share personal data in order to comply with any legal obligation, for example; we are required to share information about our pupils with the DfE

via the National Pupil Database (NPD) – more information on the NPD can be found later in this document;

- in order to enforce any agreements with you for example, music tuition;
- to protect the rights, property or safety of Venturers Trust, the pupils or others (teachers, non-teaching staff or visitors);
- in order to perform contracts with third-party suppliers for purposes listed in the section “Why Data is Collected”. The types of our third party suppliers include, but are not limited to;
 - Software applications that allow us to monitor and track pupils, for example our Management Information System called SIMS, and software that furthers the education of pupils, for example MyMaths.
 - Communication tools and software such as Teachers2Parents email and sms messaging service.
 - Other public sector bodies, such as the Local Authority (LA), the NHS and the DfE.

The National Pupil Database (NPD)

The National Pupil Database is owned and managed by the DfE and contains information about pupils in academies in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the DfE. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including academies, local authorities and awarding bodies.

Venturers Trust are required by law to provide information about our pupils to the DfE as part of a statutory data collections, such as the academy census and early years’ census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013.

The DfE may share information about pupils from the NPS with third parties who promote the education or well-being of children in England by:

- conducting research or analysis;
- producing statistics;
- providing information, advice or guidance.

The DfE has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether the DfE releases data to third-parties are subject to a strict approval process, which is based on a detailed assessment of the following:

- who is requesting the data;
- the purpose for which it is requested;
- the level and sensitivity of the data requested;
- the arrangements in place to securely store and handle the data safely.

To be granted access to pupil data, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements, retention and use of the data.

For more information, please visit the following websites.

- Information on the NPD: <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>
- Information on the department’s data sharing process: <https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>

- Information on which organisations the DfE has provided pupil information, and for which project the data has been provided: <https://www.gov.uk/government/publications/dfE-external-data-shares>

Your Data Rights

Parents and pupils have the following rights in relation to the processing of their personal data.

- Be informed of how the Venturers Trust uses your personal data.
- Request access to the personal data that is held about you.
- Request that your personal data be amended if it is incomplete or inaccurate.
- Request that your personal data be deleted if there is no compelling reason for its continued processing.
- Request that the processing of your personal data is restricted.
- Object to your personal data being processed.
- To have your data provided in a portable format.

You can find more information about your data rights from the Information Commissioner (details below).

Requesting Your Data

Where Venturers Trust holds personal data concerning you, you are entitled to access that personal data and the following information (unless an exception applies):

- a copy of the personal data we hold concerning you, provided by the Academy;
- details of why we hold that personal data;
- details of the categories of that personal data;
- details of the envisaged period for which that personal data will be stored, if possible;
- information as to the source of personal data if that personal data was not collected from you personally.

If you want to receive a copy of the information that we hold about your child, please contact the Data Protection Officer, whose details can be found in the *“Our Details”* section of this document.

Complaints

If you are unhappy with the way we have dealt with any of your concerns, you can make a complaint to the Information Commissioner’s Office (ICO), the supervisory authority for data protection issues in England and Wales. The ICO is a wholly independent regulator established in order to enforce data protection law.

If you have a complaint, we would recommend that you complain to us in the first instance, but if you wish to contact the ICO, their Contact Us page has a variety of ways in which to get in contact with them; <https://ico.org.uk/global/contact-us/>.

ICO Helpline: 0303 123 1113

ICO Email: casework@ico.org.uk

ICO Postal Address: Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow

Changes to This Notice

Any changes to this notice in the future will be posted on our website and, where appropriate, notified to you via e-mail. Please check the website frequently to see any updates or changes.