



# Attigo Academy Trust Privacy Notice

## Who are we?

We are Attigo Academy Trust, a charitable company limited by guarantee registered in England and Wales under company registration number 11420376 at registered address Worcesters Primary School, Goat Lane, Enfield, EN1 4UF.

Alma Primary School, Keys Meadow Primary School, Houndsfield Primary School and Worcesters Primary School are business names of Attigo Academy Trust. This notice applies to all the schools within the Trust.

## How we use your information

We collect information about:

- pupils of our schools, including prospective pupils
- people that have responsibility for our pupils (such as parents, carers etc.)
- our staff, contractors and volunteers, the Trust workforce
- people who use school facilities such as renting school premises

This information is used to help us:

- deliver education
- contact the right people about issues
- ensure a healthy, safe environment for learning
- carry out our functions as an employer

If we hold data about you, you have rights in respect of your data including:

- the right to be supplied information on our uses
- to see what data we are holding about you
- to request correction or erasure of your data
- to object to processing
- to complain to our data protection officer or the supervisory authority

If you wish to exercise any of these rights, please see the contact us details later in this document

This Privacy Notice is updated regularly. The latest version will always be on our website, so please check at [www.attigoacademytrust.co.uk](http://www.attigoacademytrust.co.uk) for the newest version.

The Local Education Authority, Enfield Council, also holds data to carry out their functions, and we share data with them. You can read their privacy notice at <https://new.enfield.gov.uk/privacy-notice>.

The rest of this document gives further details on our collection, storage and use of data for each type of data we hold. It also provides information on who we share with and how to exercise your rights if you are not happy.

We welcome your comments on how we can improve this notice; please contact us at the address given for the Trust.

## Data Usage Regarding Pupils, Including Prospective Pupils

### The categories of information that we collect, hold and share include:

- Personal information (such as name, unique pupil number and address)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Educational information (such as lesson plans, test/exam results, learning challenges)
- Health information (such as illnesses that may affect pupil safety in school e.g. allergies, asthma, epilepsy)
- Safeguarding information (such as recordings of remote teaching, social care issues)
- Behavioural information (such as exclusions and alternative provision)
- Information from previous schools
- Photographs of pupils and their work for identification, classroom use and updating parents
- CCTV images in areas of the school and its surroundings
- Login details for school IT
- Biometric information for ensuring safe access to school meals

### Why we collect and use this information

We use the pupil data:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to keep children safe (such as food allergies and emergency contacts)
- to meet statutory duties placed on us for supplying data to others (such as the Council, the Department for Education)

### The lawful basis on which we use this information

We collect and use pupil information under:

- the UK GDPR Article 6 1(c) legally required information. For example where we are required to collect information by the Education Act 1996
- the UK GDPR Article 6 1(e) and 9 2(g) – information necessary for the safe and effective provision of education.
- the UK GDPR Article 6 1(a) and 9 2(a) – for example where data has been supplied by the parent for use in the school setting e.g. information about family preferences in respect of religion

Note that Health professionals commonly gather data in school settings for a variety of purposes. This data is **not** held by the school, and is detailed in the Local Authority privacy notice at <https://new.enfield.gov.uk/privacy-notice>.

Where we use biometric identification, an alternative method is always available should pupils or parents wish.

### Collecting pupil information

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the data protection law, we will inform you whether you are required to give certain information to us or if you have a choice in this.

### Storing pupil data

We store pupil data as detailed in our retention schedule, published on our school and trust websites. In general, pupil data held on the pupil record is kept until the pupil transfers to a new school, or if no transfer occurs, retained until the pupil's 25th birthday.

## Who we share information with

We routinely share pupil information with:

- schools that the pupil will attend after leaving us
- our local authority
- the Department for Education (DfE)
- NHS staff working in the school setting

## Why we share pupil information

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

We share pupils' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

We are required to share information about our pupils with the (DfE) under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

## 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>.

All data is transferred securely and held by the Department for Education (DfE) under a combination of software and hardware controls, which meet the current [government security policy framework](#).

For more information, please see 'How Government uses your data' section. For privacy information on the data the Department for Education collects and uses, please see:

<https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3>

## 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.

We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school 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.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

The department may share information about our pupils from the NPD 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 Department 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 DfE releases data to third parties are subject to a strict approval process and 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 information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided pupil information, (and for which project), please visit the following website: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

To contact DfE: <https://www.gov.uk/contact-dfe>

## **Data Usage Regarding People That Have Responsibility for our Pupils**

### **The categories of information that we collect, hold and share include:**

- Personal information (such as name and address)
- Contact details (such as mobile telephone number or other ways to get in touch)
- Information you have provided us e.g. emails and telephone calls
- Social care information as part of your child's record, where applicable

### **Why we collect and use this information**

We use the data about people that have responsibility for our pupils:

- to contact them, both routinely and in emergencies
- to ensure they are kept aware of pupil's progress as appropriate
- to comply with the law regarding data sharing

### **The lawful basis on which we use this information**

We collect and use this information under:

- the UK GDPR Article 6 1(c) – for example where we are required to do so by the Education Act 1996
- the UK GDPR Article 6 1(e) and 9 2(g) – information necessary for the safe and effective provision of education.
- the UK GDPR Article 6 1(a) – for example additional contact information supplied to us above that required by law

### **Collecting information**

Whilst much of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the data protection law, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

### **Storing data**

We store data as detailed in our retention schedule, published on our school and trust websites. In general, if your data is held on the pupil record it is kept until the pupil transfers to a new school, or if no transfer occurs, retained until the pupil's 25th birthday.

### **Who we share people that have responsibility for our pupils' information with**

We routinely share information with:

- schools that the pupil will attend after leaving us
- our local authority
- the Department for Education (DfE)
- NHS staff working in the school setting

### **Why we share information**

We do not share information about people that have responsibility for our pupils with anyone without consent unless the law and our policies allow us to do so.

We are required to share information about people that have responsibility for our pupils with the (DfE) under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

## **Data Usage Regarding Schools Workforce and Applicants**

### **The categories of school workforce information that we collect, process, hold and share include:**

- personal information (such as name, employee or teacher number, national insurance number)
- special categories of data including characteristics information such as gender, age, ethnic group, vetting and barring information
- contract information (such as start dates, hours worked, post, roles and salary information)
- work absence information (such as number of absences and reasons, which commonly includes health data)
- safeguarding information (such as recording of remote learning sessions)
- qualifications (and, where relevant, subjects taught)

### **Why we collect and use this information**

We use school workforce data to:

- enable the development of a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- maintain safety of staff and pupils
- enable individuals to be paid
- manage the occupational health of the workforce

### **The lawful basis on which we process this information**

We process this information under UK GDPR Article 6 1(b) – contract to which the data subject is a party or information prior to entering into a contract, specifically, the employment or volunteer contract and Article 6 1(c) e.g. Education Act 1996.

Certain special characteristics are processed under UK GDPR Article 6 1(c) and Article 9 2(b) e.g. Ethnicity information required by the Equalities Act 2010.

### **Collecting this information**

Whilst much of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain school workforce information to us or if you have a choice in this.

### **Storing this information**

We store data as detailed in our retention schedule, published on our school and trust websites. . In general, workforce data is held until 6 years after the workforce member leaves, applicant data for six months following unsuccessful application.

### **Who we share this information with**

We routinely share this information with:

- our local authority
- the Department for Education (DfE)
- our occupational health provider, COPE Occupational Health

### **Why we share school workforce information**

We do not share information about workforce members with anyone without consent unless the law and our policies allow us to do so.

#### **Local authority**

We are required to share information about our workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

### **Department for Education (DfE)**

We share personal data with the Department for Education (DfE) on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding / expenditure and the assessment educational attainment.

We are required to share information about our pupils with the (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

### **Occupational Health Provider**

We share personal data with COPE Occupational Health, our occupational health provider, on a contracted basis to help us meet the legal requirements of the Health and Safety at Work etc., Act 1974 and related law and regulations. Their privacy notice is available at the link below:

COPE Occupational Health

<https://www.cope.co.uk/privacy-notice>

### **Data collection requirements**

The DfE collects and processes personal data relating to those employed by schools (including Multi Academy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

The department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

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

The department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal data to third parties are subject to a strict approval process and 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 securely store and handle the data

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

For more information about the department's data sharing process, please visit:

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

To contact the department: <https://www.gov.uk/contact-dfe>

## **Data Usage Regarding People Who Use School Facilities**

### **The categories of facilities user information that we collect, process, hold and share include:**

- personal information (such as name, address, email, other contact details)
- special categories of data including characteristics information such as gender, age, ethnic group, vetting and barring information
- contract information (such as start dates, premises rented, financial transactions, usages of premises)

### **Why we collect and use this information**

We use facilities user data to:

- fulfil our contracts with you to provide facilities
- ensure payments are collected
- maintain safety of staff and pupils

### **The lawful basis on which we process this information**

We process this information under UK GDPR Article 6 1(b) the contract to rent you facilities and Article 6 1(c) e.g. Education Act 1996. Certain special characteristics are processed under UK GDPR Article 6 1(c) and Article 9 2(b) e.g. Ethnicity information required by the Equalities Act 2010.

Full details of the legal basis for our data use is given in our Data Protection Impact Assessments which are available on request.

### **Collecting this information**

Whilst much of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain school workforce information to us or if you have a choice in this.

### **Storing this information**

We store data as detailed in our retention schedule, published on our school and trust websites.

### **Who we share this information with**

We do not routinely share this information.

### **Why we share facilities user information**

We do not share information about facilities users with anyone without consent unless the law and our policies allow us to do so.

# Your Rights in Relation to Personal Information

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request in relation to personal information, or be given access to your child's educational record, please contact us at the details in the [Contact Us](#) section of this notice.

You also have the right to:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for a copy of your personal information we have about you – this is called 'right of access', this is also known as a subject access request (SAR), data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete, in certain circumstances – this is called 'right to rectification'.
- the right to ask us to delete your personal information, in certain circumstances – this is called 'right to erasure'.
- the right to ask us to stop using your information – this is called 'right to restriction of processing', in certain circumstances.
- the 'right to object to processing' of your information, in certain circumstances.
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to [complain to the Information Commissioner](#) if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not 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.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at [raise a concern with ICO](#).

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

## Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know at the contact details below. Note that for pupils most data is not processed by consent.

## Contact Us

If you would like to discuss anything in this privacy notice, contact the school, the data protection officer or the regulator, details are given below.

### Contacting the schools

We strongly recommend you contact our member schools directly with your concerns. The schools can be contacted at:

Website: [www.almaprimary.co.uk](http://www.almaprimary.co.uk)  
By Email: [office@alma-primary.org.uk](mailto:office@alma-primary.org.uk)  
By Phone: 0208 804 3302  
By Post: Alma Primary School, Alma Road, Enfield, EN3 4UQ

Website: [www.houndsfieldprimary.co.uk](http://www.houndsfieldprimary.co.uk)  
By Email: [office@houndsfield.enfield.sch.uk](mailto:office@houndsfield.enfield.sch.uk)  
By Phone: 020 8805 3406  
By Post: Houndsfield Primary School, Ripon Road, N9 7RE

Website: [www.keysmeadowprimary.co.uk](http://www.keysmeadowprimary.co.uk)  
By Email: [office@keysmeadow.enfield.sch.uk](mailto:office@keysmeadow.enfield.sch.uk)  
By Phone: 0208 350 8200  
By Post: 84 Tysoe Avenue, Enfield, EN3 6FB

Website: [www.worcestersprimary.co.uk](http://www.worcestersprimary.co.uk)  
By Email: [office@worcesters.enfield.sch.uk](mailto:office@worcesters.enfield.sch.uk)  
By Phone: 020 8363 7860  
By Post: Worcesters Primary School, Goat Lane, Enfield, EN1 4UF

### Contacting our Data Protection Officer

The Data Protection Officer for the school can be contacted as below. Please ensure you include which school is involved:

By Email: [dpoattigo@excathedra.solutions](mailto:dpoattigo@excathedra.solutions)  
By Post: Data Protection Officer, Attigo Academy Trust, Worcesters Primary School, Goat Lane, Enfield, EN1 4UF

### Contacting the regulator

We recommend that you try to resolve the issue with the school or the Data Protection Officer in the first instance.

To contact the Information Commissioner's Office, please go to <https://ico.org.uk/concerns/>