

Privacy notice for students

You have a legal right to be informed about how the Trust, and our schools use 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 **students at our school**, like you.

We, Anthem Schools Trust, are the 'data controller' for the purposes of data protection law.

Our Trust Data Protection Officer is Claire Pannell. We also have school data protection leads (see 'Contact us' below).

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
- Information about how you use school computers and other IT and communications systems.

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
- Biometric data (for example fingerprints)

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

Why we use this data

We use the data listed above to:

- Educate you
- Look after your wellbeing and keep you safe
- Get in touch with you and your parents or carers when we need to

- Check how you're doing in exams and work out whether you or your teachers need any extra help
- Track how well the school as a whole is performing
- Monitor and report on your progress, attendance and welfare
- Provide food in school
- Make sure our computers and other school systems and equipment are used appropriately, legally and safely
- Answer your questions and complaints
- Publish statistics, for example, about the number of pupils or learners in schools
- 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 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).

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.

Use of your personal data for filtering and monitoring purposes

While you are 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 and Safeguarding Policy, Acceptable Use agreement)
- 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

Our lawful basis for using this data

Our lawful bases for processing your personal data for the purposes listed above will be one or more of the following:

- Public task
- Legal obligation
- Consent
- Vital interests
- To fulfil a contract
- Legitimate interests

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

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.

Collecting this data

We will only collect and use your personal information when the law allows us to, as detailed above. While most of the information we collect about you is mandatory (i.e. you have to give us the information), 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 or your parents/carers, but we may also hold data about you from:

- Local councils
- Government departments or agencies
- Police forces, courts, tribunals
- Other schools or trusts
- Department for Education (DfE)

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 to comply with our legal obligations or to meet our regulatory requirements. Our Retaining Records Policy, available on request, sets out how long we keep information about students.

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 have a legal requirement to retain it.

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:

- Schools that you may attend after leaving us
- The local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions
- Government departments or agencies
- Our youth support services provider
- Our regulator, Ofsted Department for Education
- Suppliers and service providers including but not limited to catering suppliers, school trip providers, third party education resources, apps and providers
- Financial organisations
- 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

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.

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

Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013 (as amended, including by the Education (Information About Individual Pupils) (England) (Amendment) Regulations 2024).

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

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

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

Please note: this list is not exhaustive.

Once students 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).

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 personal data](#).

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

Transferring data internationally

We may share personal information about you with the following international third parties (organisations, companies, etc, that are based outside the UK), where different data protection legislation applies:

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

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.

How to access personal information that we hold about you

Once you are old enough to be able to understand your rights over your own data (generally considered to be age 12, but this has to be considered on a case-by-case basis), you have a right to make a 'subject access request' to gain access to personal information that we hold about you. For students who do not have sufficient capacity, parents/carers can make this request on their behalf.

For further information please see the Data Protection Policy.

If you would like to make a request or you have any questions about this, please contact us (see 'Contact us' below).

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, dependent on your age. For example, you (or your parents/carers on your behalf) have the right to:

- Say that you don't 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 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 (ICO), if you feel we have not used your information in the right way
- Claim compensation if the data protection rules 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.

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

Complaints

We take complaints about how we collect and use 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 raise this with us in the first instance. You can make a complaint to us at any time by contacting our Deputy Data Protection Officer at complaints@anthemtrust.uk. Upon receiving a complaint, we will:

- Acknowledge receipt of the complaint within 30 days of receiving it
- Without undue delay, take appropriate steps to respond to the complaint, including:
 - Making appropriate enquiries based on the circumstances of the complaint
 - Keeping the complainant informed on the progress of the investigation

- Without undue delay, inform the complainant of the outcome of the investigation.

You can also 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.

Recording of telephone calls

All telephone calls with Anthem schools may be recorded for training, quality assurance, and establishment of facts purposes. We have notices on our websites, in our Data Protection policy and in all our privacy notices to set this out. We also have included information about this on the automatic voice message for each school and the Trust. Personal data obtained on calls is collected, stored, and processed in accordance with data protection legislation as set out in our Data Protection policy.

Contact us

If you have any questions, concerns, or would like more information about anything mentioned in this privacy notice, please contact the **school data protection lead** (see Appendix 2 of our Data Protection Policy) or our **Trust Data Protection Officer**:

Claire Pannell at cpannell@anthemtrust.uk, 0333 996 3030

The school **data protection lead** has day-to-day responsibility for data protection issues in our schools.