

## Privacy Notice for Parents and Pupils – How we use your information

2023/24

### Who are we?

The Inclusive Learning Federation is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

The Inclusive Learning Federation's schools (Priory Common School, Bradwell Village School & Romans Field School) are registered as the Data Controller with the Information Commissioner's Office (ICO).

You can contact The Inclusive Learning Federation as the Data Controller in writing at:

Romans Field School, Shenley Road, Bletchley, Milton Keynes, MK3 7AW or  
admin@rfs.ilf.education

### What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our pupils and parents.

### What is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information relates to personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

### What personal information do we process about pupils and parents?

- The pupil and parent information that we collect, hold and share includes:



- Personal information including a pupil's name, date of birth, unique pupil number, home address
- Attendance information such as sessions attended, number of absences and absence reasons.
- Educational information including records of work, assessment results, relevant medical information, details of pupils' special educational needs, exclusions/behavioural information, post-16 learning information.
- Contact information for parents, carers and other relatives, including telephone numbers, home addresses and e-mail addresses.
- Information about a child's home life, where required as part of necessary safeguarding and welfare processes.
- Details of any support received, including care packages, plans, and support providers.
- 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:
  - Any medical conditions we need to be aware of, including physical and mental health
  - Photographs and CCTV images captured in school
  - Characteristics, such as ethnic background or special educational needs

### Why do we use personal information?

We use pupil data:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- To protect pupil welfare
- to assess the quality of our services
- to comply with the law regarding data sharing
- to safeguard pupils
- to share medical information with health professionals
- Administer admissions waiting lists
- Carry out research

### Use of yours or your child's personal data for marketing purposes

Where you have given us consent to do so, we may send you or your child marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to them.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by contacting us at Romans Field School, Shenley Road, Bletchley, Milton Keynes, MK3 7AW or [info@romansfieldschool.org.uk](mailto:info@romansfieldschool.org.uk)

### Use of your child's 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.



## 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 UK General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

Most of the data we collect in relation to parents and pupils will come direct from the parent or pupil. However, we may also hold data relating to you and/or your child that has come from:

- Local authorities
- Government departments or agencies
- Police force, courts, tribunals
- External support services

## What are the legal reasons for us to process your personal information?

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. The lawful reasons we have for processing personal information are as follows:

### 1) To comply with the law

We collect and use general purpose pupil information in order to meet certain legal requirements and legal obligations placed upon the Academy Trust by law. We therefore are required to process personal information for such purposes even if you have not consented to us doing so.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

If you would like a copy of or further information regarding the statutory authorities that underpin our legal obligations, you should contact The Inclusive Learning Federation in writing.

### 2) To protect someone's vital interests

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

### 3) With the consent of the individual to whom that information 'belongs'

Whilst much of the personal information processed is in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In



these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

#### 4) To perform a public task

It is a day-to-day function of the Academy Trust to ensure that children receive the education and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that pupils are properly educated and supported

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

#### 5) We have a legitimate interest

Occasionally we have reasons to process information which fall outside of our usual day-to-day school functions. Details of the type of processing that we may undertake on this basis are set out in Table 5.

### Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

- Explicit consent of the data subject
- Processing relates to personal data which is manifestly made public by the data subject
- Necessary for establishing, exercising or defending legal claims
- Necessary for reasons of substantial public interest
- Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
- Necessary for archiving, historical research or statistical purposes 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 child's 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 manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights

We need to process it for reasons of substantial public interest as defined in legislation

### Who might we share your information with?

We routinely share pupil information with:

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- schools that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- School nurse
- NHS
- Public Health and other public health agencies
- Information Management software: SIMS, Wonde
- Education/classroom apps: EdShed, Maths Circle
- Conferencing software for homework and home learning: Google Classroom, Microsoft Teams, Zoom.
- HR and Payroll

We do not share information about our pupils or parents unless the law and our policies allow us to do so.

Please refer to the tables for information about what personal information is shared with which specific third parties.

### **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>

### **What do we do with your information?**

All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected. The Inclusive Learning Federation monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

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

### **How long do we keep your information for?**

In retaining personal information, The Inclusive Learning Federation complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which The Inclusive Learning Federation are required to retain the information.

A copy of those schedules can be located using the following link:

<https://irms.org.uk/page/SchoolsToolkit>

## Transferring data internationally



Where we transfer personal data to a country outside of the UK, we will do so with the appropriate safeguards in place in accordance with data protection law.

## What are your rights with respect of your personal information?

Under data protection law, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or to have access to your child's educational record, contact the school Data Protection Lead or the School Data Protection Officer at Warwickshire Legal Services via email at [schooldpo@warwickshire.gov.uk](mailto:schooldpo@warwickshire.gov.uk) or alternatively;

School Data Protection Officer  
Warwickshire Legal Services  
Warwickshire County Council  
Shire Hall  
Market Square  
Warwick  
CV34 4RL

**\*\*Please ensure you specify which school your request relates to.\*\***

Bradwell Village School  
Priory Common School  
Romans Field School

In certain circumstances where The Inclusive Learning Federation processes data for the purposes of legitimate interests or to fulfil their public task, individuals have a right to object to the processing where it is likely to cause, or is causing, harm or distress. When exercising this right, individuals should contact The Inclusive Learning Federation to inform them of their reasons for their objection. The Inclusive Learning Federation will consider the reasons for any objection and assess the risk to the individual against the purposes for the processing. In the event The Inclusive Learning Federation is unable to comply with an objection, we will ensure we can demonstrate compelling legitimate grounds to continue with the processing.

Where The Inclusive Learning Federation processes your information with your consent, you have the right to withdraw your consent at any time. To exercise this right, please contact The Inclusive Learning Federation at [info@romansfieldschool.org.uk](mailto:info@romansfieldschool.org.uk)

You also have the right to:

- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and

- claim compensation for damages caused by a breach of the Data Protection regulations



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 <https://ico.org.uk/concerns/>

## Review

The content of this Privacy Notice will be reviewed annually.

Date of next review: September 2024

Table 1 – Personal information we are required to process to comply with the law:

Information Type	Relevant legislation	Special Category– additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Contact details	Education (Pupil Registrations England) Regulations 2006, Regulation 4.	The processing is necessary for complying with the law.	Local Authority, HM Chief Inspector of Education.	Legal Obligation
Characteristics (age, ethnicity, religion etc)	Education (information About Individual Pupils) (England) Regulations 2013, Regulation 5.	The processing is necessary for complying with the law.	Local Authority or Secretary of State.	Legal Obligation
Medical conditions  Dietary requirements	Education (information About Individual Pupils) (England) Regulations 2013, Regulation 5.	The processing is necessary for complying with the law.  Necessary to protect vital interests of data subject or another person where the data subject is	Health staff, police or fire crews.	Legal Obligation and Vital Interests.

		physically or legally incapable of giving consent.		
Special educational needs	Education Act 1996, section 317  Education (information About Individual Pupils) (England) Regulations 2013, Regulation 5.	The processing is necessary for complying with the law.	Local Authority	Legal Obligation.
Free school meals/pupil premium/whether they are a looked-after child	Education (information About Individual Pupils) (England) Regulations 2013, Regulation 5.	The processing is necessary for complying with the law.	Local Authority or Secretary of State.	Legal Obligation
Emergency contact details	Education (information About Individual Pupils) (England) Regulations 2013, Regulation 5.	The processing is necessary for complying with the law.  Necessary to protect vital interests of data subject or another person where the data subject is physically or legally incapable of giving consent.	Health staff, police or fire crews.	Legal Obligation and Vital Interests.
Attendance	Education (Pupil Registration) (England) Regulations 2006, Regulation 4.	The processing is necessary for complying with the law.	Local Authority, HM Chief Inspector of Education.	Legal Obligation



Admissions	Education (Pupil Registration) (England) Regulations 2006, Regulation 4.	The processing is necessary for complying with the law.	Local Authority, HM Chief Inspector of Education.	Legal Obligation
Exclusion	Education Act 1996, section 51A	The processing is necessary for complying with the law.	Local Authority, HM Chief Inspector of Education.	Legal Obligation
Safeguarding and promoting welfare of pupils	Education Act 2002, section 175 Children's Act 1989, section 17 Children's Act 1989, section 47 Children's Act 1989, section 83 Children's Act 1989, section 11	The processing is necessary for complying with the law.	Local Authority	Legal Obligation
Academic Results	Education (information About Individual Pupils) (England) Regulations 2013, Regulation 5.	The processing is necessary for complying with the law.	Local Authority or Secretary of State.	Legal Obligation

Table 2 – Personal information we are required to process as it is necessary to protect someone's vital interests

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Medical conditions	Necessary to protect vital interests of data	Health staff, police or fire crews.	Vital Interests

Dietary requirements	subject or another person where the data subject is physically or legally incapable of giving consent.		
Safeguarding and promoting welfare of pupils	The processing is necessary for complying with the law.	Local Authority	Legal Obligation

Table 3 - Personal information we are required to process with the consent of the individual to whom that information 'belongs' - *please note that you have the right to withdraw your consent for us to process this information at any time.*

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Images of pupils	Data subject has given explicit consent.	School website	Consent
Name of Doctor surgery	Data subject has given explicit consent.	Local Authority	Consent
Contact details	Data subject has given explicit consent.	Local Authority	Consent
Consent forms (photographs, school trips etc)	Data subject has given explicit consent.	School Photos Photography School Website Educational Visits	Consent

Table 4 - Personal information we are required to process because it is necessary to do so in order to perform a public task – please note that the right to object will apply to *some* of this processing, please see the section above that refers to '*What are your rights with respect of your personal information?*'

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Name of Doctor surgery	Data subject has given explicit consent.	Local Authority	Public Task

Contact details	Data subject has given explicit consent.	Local Authority	Public Task
Consent forms (photographs, school trips etc)	Data subject has given explicit consent.	School Photos Photography School Website Educational Visits	Public Task
Behaviour incidents	Processing is necessary to perform official functions.	Local Authority	Public Task
Accident reports	Processing is necessary to perform official functions.	Local Authority	Public Task
In-class app data	Processing is necessary to perform official functions.	Seesaw Accelerated Reader Wonde EdShed Maths Circle	Public Task
Records of interventions provided	Processing is necessary to perform official functions.	School Transfer	Public Task

Table 5 - Personal information we process because we have a legitimate interest. please note that the right to object will apply to *some* of this processing, please see the section above that refers to 'What are your rights with respect of your personal information?'

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Images captured on our CCTV system	n/a	This is not shared routinely	n/a