



Trust Privacy Notice

Use of Pupil Data

Policy type	Trust wide (based on The Key model)
Review	Every three years
Author/Responsible Officer	Governance Officer
Approved by	DSAMAT senior leaders
Date of ratification	February 2026
Date of next review	February 2029

This policy is a mandatory policy for all DSAMAT Academies and must be implemented without any amendments

Enabling all to flourish: Rooted in God's love



Our mission, vision and values

Our Trust has a clear **mission** at its core, ensuring that all pupils are enabled to flourish, rooted in God's Love - academically, socially, spiritually, physically and mentally. This is central to our work and rooted in our Christian foundation (John 10 v 10). Our commitment to mutual flourishing within the school community is built upon our shared belief in Church of England principles. In our Trust, just as in the wider Church of England community, 'flourish' refers to prospering, thriving and growing. It means prayerfully encouraging all within our schools so that they might prove fruitful, successful and contented in the longer term. We seek to provide space generously for all to flourish in life and all of its structures. Equitable treatment for all pupils, staff and the wider community is a core part of enabling this long term, holistic flourishing.

We have a clear **vision** about creating successful schools for the benefit of their communities and we expect every school in the Trust to continuously improve. All schools provide rich and diverse curricula which evolve to meet the needs of their children and local communities, as well as delivering educational excellence to enable them to continue to flourish in later life.

The way we work and deliver against our mission is critical to our Trust. We have shared, agreed **values** of:

Hope; Nurture; Equality; Respect; Collaboration

The Trust's vision is underpinned by a Christian values framework which is adopted by all schools. It provides clear expectations for all Trust employees on how we wish our values to impact on all areas of school life. It draws on, and is informed by, the National Church of England Vision for Education and the Diocesan Board of Education Vision.

Each school within the Trust has a personalised vision for education, developed locally to reflect the individual character and needs of the school community. This vision is underpinned by the Trust's wider vision, and agreed with the Trust, but it is owned and driven by the headteacher and their LGB.

Our community

Our Trust is dedicated to delivering education that serves local communities. Our schools are inclusive, welcoming those from all and no faiths, from all abilities and backgrounds. We believe in providing a high-quality education, underpinned by Christian values, which enables every child to flourish.

Underpinning all of the Trust's work is a belief in educational excellence. Our Trust serves all stakeholders by providing schools with the highest levels of academic rigour and pastoral care.

Our schools are places where children and young people develop and thrive intellectually, socially, culturally, and spiritually. All of our schools teach a broad and balanced curriculum within national guidelines focusing on core skills. This is designed to ensure that all pupils reach their academic potential and seek to enrich their experience along the way. Pupils will be enabled to succeed in an atmosphere of high expectation, aspiring to educational excellence with a firm foundation of values.

This policy forms part of our Trust governance and ensures that we are held to the highest standards as we carry out our duties.

Statement of Intent

This is the Diocese of St Albans Multi-Academy Trust (DSAMAT) over-arching Privacy notice for child data policy and must be implemented and adhered to in each of the academies within the Diocese of St Albans Multi Academy Trust along with those working within the central team.

This policy will also be implemented and adhered to from the first day of any other school joining the Trust.

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1. Introduction

Under UK data protection law, individuals have a right to be informed about how our school, and the multi-academy trust (MAT) we are part of, uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about pupils at our schools.

Our trust, (DPO@stalbandsmat.co.uk) is the 'data controller' for the purposes of UK data protection law.

2. The personal data we hold

We hold personal data about pupils at our schools to support teaching and learning, to provide pastoral care and to assess how the school is performing.

Personal data that we may collect, use, store and share (when appropriate) about pupils includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Exclusion information
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Information about their use of our information and communication systems, equipment and facilities (e.g. school computers)

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

- Information about any medical conditions that we need to be aware of, including physical and mental health
- Photographs and CCTV images captured in school
- Information about characteristics, such as ethnic background or special educational needs (SEN)

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

3. Why we use this data

We collect and use the data listed above to:

- a) Support pupil learning
- b) Monitor and report on pupil progress
- c) Provide appropriate pastoral care
- d) Protect pupil welfare
- e) Assess the quality of our services
- f) Administer admissions waiting lists
- g) Carry out research
- h) Administer school property

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- i) Comply with the law regarding data sharing
- j) Make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely

We will only use pupils' 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 pupils' 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 pupils' personal information without your knowledge or consent in compliance with the above rules where this is required or permitted by law.

3.1 Use of pupils' personal data for marketing purposes

We do not currently use pupils' personal data for marketing purposes. If this changes in the future, we will amend any relevant privacy notices to explain the processing to you, including your right to object to it.

3.2 Use of pupils' personal data in automated decision-making and profiling

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

3.3 Use of pupils' personal data for filtering and monitoring purposes

While a pupil is in our schools, we may monitor their use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations
- Comply with our policies (e.g. child protection policy, IT acceptable use policy) and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)
- Protect pupils' welfare

4. Our lawful basis for using this data

The lawful bases for processing personal data are set out in Article 6 of the UK General Data Protection Regulation. The Trust processed such data because we have:

- (6a) Consent: parents/carers have given clear consent for us to process their child's personal data for the purposes indicated above.
- (6c) A Legal obligation: the processing is necessary for us to comply with the law (e.g., we are required by law to submit certain teacher assessment information and to safeguard pupils' welfare by sharing information with other agencies).
- (6d) A duty to safeguard pupils: the processing is necessary in order to protect the vital interests of the data subject (children); (e.g., if we are required to share medical history information with emergency services in the event of an accident or to other agencies when a child may be in danger).
- (6e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law (e.g., processing attendance information or academic attainment and progress records).

Where you have provided us with consent to use your child's 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.

4.1 Our basis for using special category data

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For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and 1 of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use the pupil's personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- 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 the establishment, exercise or defence of 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 the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person 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 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

5. Collecting this data

We will only collect and use your child's information when the law allows us to (as detailed above in section 4 of this notice).

While the majority of information we collect about your child is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about your child will come from you, but we may also hold data about your child from:

- Local authorities
- Government departments or agencies
- Police forces, courts or tribunals
- Other schools or trusts
- Department for Education

6. How we store this data

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We keep personal information about pupils while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary to comply with our legal obligations or to meet our regulatory requirements. Our [Data Protection Policy](#) sets out how long we keep information about pupils.

We have put in place appropriate security measures to prevent pupils' personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of pupils' personal data securely when we no longer have a legal requirement to retain it.

7. Who we share data with

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

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

- Schools that your child may attend after leaving us
- The school's local authority
- Government departments or agencies
- Youth support services provider
- Department for Education
- Our regulator, Ofsted
- Suppliers and service providers (eg catering 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 or tribunals

7.1 Sharing data with the Department for Education (DfE)

The Department for Education (a government department) collects personal data from schools and local authorities via various statutory data collections. We are required to share information about our pupils with the DfE either directly or via our local authority, via various statutory data collections.

The data shared will be in line with the following relevant legislation: Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013 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 with the DfE is used for a number of purposes, including to:

- Inform funding
- Monitor education policy and school accountability
- Support research

The information shared with the DfE could include:

- Pupil's name and address

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- Unique pupil numbers
- Pupil matching reference numbers
- 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 they did after they finished school

Please note: this list is not exhaustive.

Once a pupil reaches 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 are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school census and early years census.

Some of this information is then stored in the [National Pupil Database](#) (NPD), which is owned and managed by the Department for Education 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 that promote children's education or wellbeing in England. These third parties must agree to strict terms and conditions about how they will use the data.

For more information, see the Department for Education's webpage on [how it collects and shares personal data](#).

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

7.2 Transferring data internationally

We may share personal information about your child with the following international third parties, where different data protection legislation applies on the basis of an adequacy regulation:

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

Where we transfer pupils' 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.

8. Your rights

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8.1 How to access personal information that we hold about your child

You have a right to make a 'subject access request' to gain access to personal information that we hold about your child.

If you make a subject access request, and if we do hold information about your child (the pupil), we will (subject to any exemptions that apply):

- Give you a description of it
- Tell you why we are holding it, how we are processing 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 is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your child's personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

Once your child is able to understand their rights over their own data (generally considered to be age 13, but this has to be considered on a case-by-case basis), we will need to obtain consent from your child for you to make a subject access request on their behalf.

8.2 Your other rights regarding your child's data

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

- Object to our use of your child's personal data
- Object to the processing of personal data that is likely to cause, or is causing, damage or distress
- Prevent your child's data being used to send direct marketing
- Object to and challenge the use of your child's personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected or blocked
- In certain circumstances, have the personal data we hold about your child deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your child's personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office (ICO)
- Claim compensation for damages caused by a breach of the data protection regulations

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 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.

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

Once your child is able to understand their rights over their own data (generally considered to be age 13, but this has to be considered on a case-by-case basis), we will need to obtain consent from your child for you to make these requests on their behalf.

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 concerns 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 DPO@stalbandsmat.co.uk

Alternatively, you can make a complaint at any time 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 (DPO)**: DPO@stalbandsmat.co.uk