

## **Pupil Privacy Notice - Secondaries**

### **Why are we giving this to you?**

Your school is part of a Multi Academy Trust (MAT) called Inspire Education Trust. The MAT and your school need to use information about you. We do this for a number of reasons. This form tells you what information we use about you and why we use it. It is very important that information about you is kept safe. We explain below how the school keeps your information safe.

If you want to know anything about what we do with information about you then please ask your teacher, or speak to your parents/guardians and ask them to contact your school or the MAT. The MAT wants you to feel free to raise any questions at all. Alternatively, the MAT can be contacted c/o Hearsall Academy, Kingston Road, Earlsdon, Coventry CV5 6LR.

We also have a person called the Data Protection Officer. They can answer any questions you have about what the school does with your information. If you or your parents/guardian want to speak to them, then you can do, by contacting Warwickshire County Council DPO Service via [schoolDPO@warwickshire.gov.uk](mailto:schoolDPO@warwickshire.gov.uk).

The Trust registration number is ZA764316.

### **Privacy Statement**

We are Inspire Education Trust. During your time with us, we will use information that we gather in relation to you for various purposes. Information that we hold in relation to you is known as “personal data”. This will include data that we obtain from you directly and data about you which we obtain from other people and organisations. We might also need to continue to hold your personal data for a period of time after you have left the school. Anything that we do with your personal data is known as “processing”.

This document sets out what personal data we will hold about you, why we process that data, who we share this information with, and your rights in relation to your personal data processed by us.

### **What information do we use about you?**

We will collect, hold, share and otherwise use information about you set out in the boxes below:

<ul style="list-style-type: none"><li>• Name</li></ul>	<ul style="list-style-type: none"><li>• Telephone and email contact details</li></ul>	<ul style="list-style-type: none"><li>• Date of Birth</li></ul>
<ul style="list-style-type: none"><li>• Address</li></ul>	<ul style="list-style-type: none"><li>• Assessment information</li></ul>	<ul style="list-style-type: none"><li>• Details of previous/future schools</li></ul>
<ul style="list-style-type: none"><li>• Unique pupil number</li></ul>	<ul style="list-style-type: none"><li>• Behavioural information</li></ul>	<ul style="list-style-type: none"><li>• Language(s)</li></ul>

<ul style="list-style-type: none"> <li>Nationality</li> </ul>	<ul style="list-style-type: none"> <li>Country of birth</li> </ul>	<ul style="list-style-type: none"> <li>Eligibility for free school meals</li> </ul>
<ul style="list-style-type: none"> <li>Photographs / videos / audio recordings</li> </ul>	<ul style="list-style-type: none"> <li>Attendance information</li> </ul>	<ul style="list-style-type: none"> <li>CCTV images at some sites</li> </ul>
<ul style="list-style-type: none"> <li>Exam entries and grades</li> </ul>	<ul style="list-style-type: none"> <li>Use of ICT and internet facilities</li> </ul>	<ul style="list-style-type: none"> <li>Courses and classes</li> </ul>
<ul style="list-style-type: none"> <li>Library use</li> </ul>	<ul style="list-style-type: none"> <li>School trips and events</li> </ul>	<ul style="list-style-type: none"> <li>Admission information</li> </ul>

We will also collect, hold, share and otherwise use some information about you which is “special category personal data” and we will take extra care to make sure that this is kept safe:

<ul style="list-style-type: none"> <li>Racial or ethnic origin</li> </ul>	<ul style="list-style-type: none"> <li>Religious beliefs</li> </ul>	<ul style="list-style-type: none"> <li>Special educational needs and disability information</li> </ul>
<ul style="list-style-type: none"> <li>Medical / health information</li> </ul>	<ul style="list-style-type: none"> <li>Genetic and biometric data</li> </ul>	<ul style="list-style-type: none"> <li>Information relating to keeping you safe</li> </ul>
<ul style="list-style-type: none"> <li>Sexual life</li> </ul>	<ul style="list-style-type: none"> <li>Sexual orientation</li> </ul>	<ul style="list-style-type: none"> <li>Dietary requirements</li> </ul>

### Where do we get this information from?

We get this information from:

- You
- Your parents/guardians, and other children’s parents/guardians
- Teachers and other staff
- People from other organisations, like doctors, nurses or the local authority for example

### Why do we use this information?

We use this information for lots of reasons, including:

- To make sure that we give you a good education and to support you through this
- To make sure that we are able to address and support any educational, health or social needs you may have

- To make sure everyone is treated fairly and equally
- To keep you and everyone at the school safe and secure
- To deal with emergencies involving you
- To celebrate your achievements
- To provide reports and additional information to your parents/carers
- To conduct research or analysis and/or provide statistical reports

Some of these things we have to do by law. Other things we do because we need to so that we can run the school.

Sometimes we need permission to use your information. This includes taking pictures or videos of you to be used on our website or in the newspaper. Before we do these things we will ask you or if necessary your parent/carer for permission.

The Trust uses Microsoft Office365 applications, including Teams, to collaborate and communicate with staff, pupils and parents. Any use of services within the Trust are subject to security controls and staff training.

Inspire Education Trust share personal data with The Headteachers Report Limited for the purpose of receiving aggregated management information reports

For further detail the lawful basis for why we use your personal data, please see annex 2.

### **Why do we use special category personal data?**

We may need to use the information about you which is special (mentioned above) where there is a specific interest for us to do so, for example health and social care purposes or to provide you with equal opportunities and treatment. We will also use this information where you have given us permission to do so.

There may also be circumstances where we need to use your information in relation to legal claims, or to protect your vital interests or where you are unable to provide your consent.

### **How long will we hold information in relation to our pupils?**

We will hold information relating to you only for as long as necessary. How long we need to hold on to any information will depend on the type of information. Where you change school we will usually pass your information to your new school.

Personal data relating to pupils at the MAT is stored in line with the MAT's [Data Protection Policy and record retention and archiving procedures](#).

### **Who will we share pupil information with?**

We may give information about you to:

- Other schools or educational institutions you may attend or require support from, Local Authorities, to assist them in the exercise of their responsibilities in relation to education and training, youth support and safeguarding purposes
- The Department for Education and / or ESFA as required by the law
- The Department for Education as part of daily attendance data collections.
- Contractors, to enable them to provide an effective service to the school, such as school meal providers or external tutors
- Your parents and guardians
- The National Health Service
- Authorities in relation to the prevention and detection of crime
- Suppliers and service providers to allow them to perform contracts for services

### **Youth support services**

Once our pupils reach the age of 13, we pass pupil information to our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- youth support services
- careers advisers

A parent or guardian can object to any information in addition to their child's name, address and date of birth being passed to their local authority or provider of youth support services by informing us. This right is transferred to the child / pupil once they reach the age 16.

Data is securely transferred to the youth support service via a secure web portal and is stored on a cloud service within the UK and held for a period of one year.

### **CPOMS**

Working alongside school's existing safeguarding processes we use CPOMS which is a system which enables us to manage child protection, behavioural issues, bullying, special educational needs, domestic issues and much more. It is a system which ensures that students are safe and fully supported, and staff are trained and use CPOMS to report any concerns about the children in their care. When a child transfers from one school to another, information from CPOMS can also be transferred to the new school if they also use CPOMS. The transfer of information is done in a secure way and means that the safeguarding of a child is continued when they have left a school. The Safeguarding Lead at the Local Authority has access to CPOMS for emergency use, for example when schools are not in session.

## **School Immunisation Programs**

We share information with the School Age Immunisation Service (SAIS) in line with Department for Education guidance. This includes sharing lists of eligible young people, and parent contact information.

## **International Transfers outside the European Economic Area**

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law, ensuring there are adequate safeguards in place. The transfer mechanisms include standard contractual clauses, adequacy agreements, and International Data Transfer Agreements.

## **Keeping this information safe**

It is very important that only people who need to use your information can see it. The school keeps your information safe by:

Training and supporting our staff to work with data safely.  
Carefully selecting and managing the IT systems we use.  
Carefully choosing suppliers of services to the MAT.  
Appointing a Data Protection Officer  
Performing data protection impact assessments where appropriate  
Only disclosing information to others where it is lawful and necessary.  
Securely disposing of old IT devices and paper records.

## **Your rights in relation to your information**

You can ask to see or receive a copy of the information we hold about you. If you wish to do this you should contact your form tutor in the first instance.

You also have the right to:

- Be informed about how the MAT uses your personal data
- Object to what we are doing with your information
- Have inaccurate or incomplete information about you amended
- Ask us to stop doing certain things with your information in some cases
- Ask that decisions about you are not made using automatic systems
- Request that your personal data is deleted where the school no longer needs to keep this
- Claim against the MAT in certain circumstances where you have suffered as a result of the MAT breaching your data protection rights
- Withdraw your consent and request that we erase your information where consent was used or where we no longer have a reason to keep it

If you feel it necessary to do any of the above, you can speak with your form tutor. The MAT does not have to meet all of your requests and we will let you know where we are unable to do so.

### Concerns

If you are concerned about how we are using your personal data then you can speak with your tutor, or our Data Protection Officer, whose details are above, or if necessary you or your parent/ carer can contact an outside agency - the Information Commissioner's Office who could also help at <https://ico.org.uk/concerns/>.

### Changes to our privacy notice

We keep our privacy notice under review and we will place any updates on this webpage. This privacy notice was last updated in February 2025.

### **Appendix 1 – Blue Coat school specific processing**

*Blue Coat Church Of England School uses CCTV for the following purposes:*

- *To provide a safe and secure environment for pupils, staff and visitors.*
- *Footage may be used as evidence during internal disciplinary proceedings, grievance procedures or complaints where related to the provision of such a safe and secure environment, subject to the usual confidentiality requirements of those procedures.*
- *To prevent the loss of or damage to Blue Coat's buildings and/or assets*
- *To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders*
- *To provide evidence in case of disputes with contractors and other third parties*

*For further information about our use of CCTV, please refer to our CCTV Policy*  
<https://bluecoatschool.com/about/policies>

*Blue Coat Church Of England School may use Microsoft Teams to help us deliver online lessons where some or all pupils are at home. We will explain at the start of the lesson what our expectations are regarding pupil behaviour, including having pupils at home turn off their cameras and microphones at the start of the lesson, and when to un-mute the microphone. The teacher will position the camera inside the classroom so that it points towards the teacher, and away from pupils.*

*On some occasions, the teacher may wish to record the lesson for the purposes of allowing children who missed the lesson to catch up, or for the class to be able to refer to the lesson for revision purposes. In which case, Microsoft Teams will notify the user that the session will be recorded. If a student does not wish to participate in the recorded session, the lesson can be watched at a later date. The teacher will ensure that footage of any such recorded lesson is only shared with children in that class, it will be stored securely and with limited access*

*and they will only retain the footage for as long as necessary, which will be no longer than the end of the current academic year.*

*We use educational systems for the purpose of supporting students whose first language is not English, and to support students with a low level of literacy.*

*We use a variety of online learning platforms in order to support and enhance lessons, homework, and learning.*

*We use third party systems to help us manage our careers provision to pupils, for staff recruitment purposes, and for communication with staff, students and parents.*

*We use video conferencing platforms to communicate with staff, parents, students, and other organisations, including the delivery of parents evenings.*

*Our library provision is supplemented by online systems, allowing access to electronic reading materials and promoting literacy.*

*Data integration services link our MIS data to the aforementioned systems and platforms to enable them to function.*

*We use third party systems and portals to exchange data with exam boards, such as exam entries, withdrawals, results etc.*

*We share data with third party organisations when they provide work related learning and alternate provision for our students.*

*We share data with Coventry LA when we source Work Related Learning provision through the LA programme. Further information can be found here via [this link](#).*

*Carefully selected providers assist us with the operation and management of our ICT systems and services.*

*Our Christmas and other music videos will include performances from participating children, where there is consent for the school to do so. The videos will be published for public access on YouTube and on the school website, for up to two years.*

*We participate in teacher training with other training providers. Where trainee teacher observations cannot be performed on site due to social distancing measures, teacher observations may take place remotely via a live, private video stream. The camera is pointed away from children. No recording takes place.*

*The LRS (Learning Records Service) requires us to give the following information:*

*The information you supply is used by the Learning Records Service (LRS). The LRS issues Unique Learner Numbers (ULN) and creates Personal Learning records across England, Wales and Northern Ireland, and is operated by the Education and Skills Funding Agency, an executive agency of the Department for Education (DfE). For more information about how your information is processed, and to access your Personal Learning Record, please refer to: <https://www.gov.uk/government/publications/lrs-privacy-notice>*

*Blue Coat School sometimes creates videos of teachers in classrooms for the purposes of developing teacher pedagogy and improve teaching and learning. Videos are focused on staff members but pupils may appear in videos on screen on through sound. These videos are only available internally within Inspire Education Trust.*

*We share some parent data with Sparx Learning to improve student engagement with tasks and provide feedback on student work.*

*The school may use generative AI including ChatGPT for the purpose of improving pedagogy and pupil education. Pupil personal data is not entered into the system.*

*The school canteen has an optional biometrics system allowing pupils to pay via facial recognition and/or fingerprint. This data is shared with CRB Cunninghams who provide the Canteen system, and OCS Catering who staff the canteen. Pupils who do not wish to use biometrics can pay via a PIN. Pupils/Parents who have chosen to use the biometric system and later change their minds can do so by emailing [schooloffice@bluecoatschool.com](mailto:schooloffice@bluecoatschool.com)*



## **Appendix 2 – Lawful Basis for processing data**

**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
Special Education Needs Report	Children's and Families Act 2014, section 69		Local Authority	Legal Obligation
Attendance register	Education (Pupil Registration)(England) Regulations 2006, Regulation 4, 10, 11 and 12		OFSTED, Local Authority	Legal Obligation
Common Transfer file	Education (Pupil Registration)(England) Regulations 2005, Regulation 6		School pupil transfers to	Legal Obligation
Safeguarding information	Education Act 2002, section 175 Children's Act 1989, Section 17, 47, 83. Children's Act 2004, Section 11		Local Authority	Legal Obligation
Admissions Register	Education (Pupil Registration)(England) Regulations 2006, Regulation 4, 10, 11, 14 and 15		OFSTED, Local Authority	Legal Obligation
Curricular Record including Assessment and achievement data	Education (Pupil Information) (England) Regulations 2005, Regulation 4		OFSTED, Local School. Local Authority	Legal Obligation

Educational Record	Education (Pupil Information) (England) Regulations 2005, Regulation 5 and 6		Parents, Local school	Legal Obligation
Pupil Information i.e name, age address, Emergency contact details	Education (Information About Individual Pupils) (England) Regulations 2013, Regulation 3 and 5		Department of Education – school census. Other schools – when pupils transfers, elearning platforms – when required to create accounts (under public task)	Legal Obligation, Public Task
Medical / Dietary / allergies		Necessary for preventative or occupational medicine	Department of Education – school census. Other schools – when pupils transfers	Legal Obligation
School Census & DfE daily data collections	Education Act 1996, Sections 537 & 537A, and accompanying regulations		Department of Education	Legal Obligation
Staff information, including personal details, DBS check, qualifications	Education Act 2005, section 114		Secretary of State, Warwickshire County Council, Disclosure and Barring Service	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 Information	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent'	Medical staff i.e. paramedics/ambulance	Vital Interest
Religious belief	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent'	Medical staff i.e. paramedics/ambulance	Vital Interest

**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
Photographs		Websites & other organisations with whom you have given consent, or those who allow us to celebrate achievement and/or promote the school.	Consent
Biometrics data for Canteen system (Face / Fingerprint)	Explicit consent	Canteen providers	Consent
Basic personal details e.g. name		Production of school leavers material, sharing name with media where it celebrates achievement and/or promotes the school	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 ‘*Your rights in relation to your information*’

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Pupil Information i.e name, age address, Parent detail, Emergency contact details		Department of Education – school census. Other schools – when pupils transfers	Legal Obligation
Academic Progress data including assessments, classwork, homework and staff observations		OFSTED, Parents, Health such as Speech and Language	Public Task & Legal Obligation
Safeguarding information, Medical, Special Education Needs		Local Authority, Health, Parents	Legal Obligation
Educational and Safeguarding Information used internally for the purpose of educating and protecting the welfare of children.			
Behaviour & achievement records		Parents	Public Task
Images captured on our CCTV system		This is not shared routinely. Rarely images may be shared with consent, or to authorities e.g. Police.	Legal Consent Obligation,
Examination data including access arrangements	Substantial public interest	JCQ & exam boards	Public Task
Any personal information shared with school counsellors	Substantial public interest		N/A