

Privacy Notice for Parent/Carers and Students

How we use your information

2023/24

Who are we?

President Kennedy School is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

The Futures Trust is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: ZA154781.

You can contact the school as the Data Controller in writing at: President Kennedy School, Rookery Lane, Coventry CV6 4GL or Reception@pks.coventry.sch.uk

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 students and parents/carers.

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, including 'special category' personal information do we process about students and parent/carer/carers/carers?

The student and parent/carer information that we collect, hold and share includes, but is not restricted to:

- Personal information including a student's name, date of birth, unique student number and home address
- Characteristics such as ethnicity, language, nationality, country of birth, etc.
- Attendance information such as sessions attended, number of absences and absence reasons and dates and times of signing in and out of the school site
- Assessment and exam results and other academic data about their school work
- Medical information, including details of any allergies or medical conditions or special educational needs that they might have
- Behavioural records and data about any disciplinary matters or conduct issues that have arisen
- Information about their future plans, including where they might move on to when they leave school
- Contact information for parent/carer 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. This will also include your relationship to your child, including any Court orders or criminal petitions which relate to you or your child that may be in place.
- Financial details (such as bank account or credit card details), and other financial details such as eligibility for free school meals or other financial assistance
- Dietary requirements
- Reported accidents
- Images recorded routinely as part of our CCTV monitoring (for example, if you attend the school and appear on footage). We use CCTV to make sure that the school site is safe. Cameras are only placed where they do not intrude on anyone's privacy and where they are necessary to fulfil their purpose.
- Biometric data (finger prints)
- Information recorded on our electronic signing in system if you attend school for meetings.
- Photographs

Why do we use personal information?

We use student data:

- to support student learning
- to monitor and report on student progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing
- to safeguard students
- to celebrate student achievements
- to notify of behaviour issues
- to share medical information with relevant school staff and Public Health agencies
- to allow cashless payments to be made
- to provide careers advice and support
- to keep the school community safe and well

Collecting student information

The school routinely collects student data in a number of ways. Firstly, the admission form that people fill in gives us lots of personal information about new students before they start at the school. Parents/carers then continue to provide additional information (for example every time they phone the school to report an absence or when they discuss their child's progress with teachers). They also update important details on student data collection forms throughout their time at school.

Teachers and other staff from the student's old school might also pass on relevant information to us. Likewise, the students themselves share personal information with their tutors and other staff throughout their time with us.

Sometimes we also receive information about named students from other people/organisations, like the student's doctor if we need it to look after them, or from an agency that is supporting them (i.e. if they need emotional support).

We also use CCTV to make sure the school site is safe and we often film or take photographs at events, so students' pictures and voices are often recorded in this way.

Whilst the majority of student 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 GDPR, we will inform you whether you are required to provide certain student information to us or if you have a choice in this.

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 student information in order to meet certain legal requirements and legal obligations placed upon The Futures Trust by law. We therefore are required to this 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 Futures Trust 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 Futures Trust to ensure that students 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 students 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.

In certain circumstances, an individual has the right to object to any processing where it is likely to cause or is causing harm or distress. To exercise this right, individuals should do so by contacting President Kennedy School to inform them of their reasons for the objection. These reasons should relate to your specific circumstances. Upon receipt of an objection, President Kennedy School will consider the reasons for the objection and balance this against the legitimate grounds to process data.

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.

In certain circumstances, an individual has the right to object to any processing where it is likely to cause or is causing harm or distress. To exercise this right, individuals should do so by contacting President Kennedy School to inform them of their reasons for the objection. These reasons should relate to your specific circumstances. Upon receipt of an objection, President Kennedy School will

consider the reasons for the objection and balance this against the legitimate grounds to process data.

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:

- 1) Explicit consent of the data subject
- 2) Processing relates to personal data which is manifestly made public by the data subject
- 3) Necessary for establishing, exercising or defending legal claims
- 4) Necessary for reasons of substantial public interest
- 5) Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
- 6) Necessary for archiving, historical research or statistical purposes in the public interest

The lawful reasons for each type of special category personal information data that we process is set out in the tables attached.

Who might we share your information with?

We routinely share parent/carer and student information with other people and when we have to by law or when we have good reason to. Here are some examples:

- From time to time we may be required to provide students' information to central government, i.e. through the Department for Education, the Education and Skills Funding Agency or the Learning Records Service.
- We may need to share information with the local authority, Coventry City Council, e.g. to check eligibility for free school meals, for attendance reasons or for recording details of accidents occurring at school.
- In accordance with our legal obligations, we may share information with our local authority, Coventry City Council, the Department for Education, or other schools, for example, where we have any safeguarding or well-being concerns.
- On occasion, we may need to share information with police forces, courts, tribunals if there are incidents involving students and/or their parents/carers
- Our insurance company or our legal advisers (e.g. this might be to help with an inquiry if a student is injured at school, etc.)
- We may share information about academic progress, SEND information and medical information with tutors that the school engages to support students with their studies;
- We may need to share information with medical professionals when a student requires such medical care.
- We share student names, dates of birth and parents'/carers' contact details with the School Nursing Team and the School Age Immunisations team when required.
- We may share some information with our insurance company, for example, where there is an incident involving the school or to ensure that our cover is adequate.
- We may share information with our governors (for example if they are involved in any process, procedure or appeal which involves you/your child).
- If your child is going on a school trip or attending an event, we may need to share some of their information (i.e. information about relevant medical conditions) with the event organiser/host organisation or the tour operator or accommodation provider.
- We also have a risk management system, EVOLVE where we have to enter student data onto that in order to assess risk when planning off site activities and school trips, etc. This means that you/your child's medical information and other personal data may need to be shared with this system for the purposes of risk assessments if they want to participate in such events.
- We may use photographs of you/your child on the school's website or social media sites or in the prospectus or other publications to show prospective students what we do as well as for teaching purposes.

- We may include student names and photographs in programmes for school productions.
- We need to let our catering team, Taylor Shaw, know if you/your child has a food allergy, dietary requirements or Free School Meal entitlement.
- We may share academic and behaviour and attendance records and data with parents/carers and other professional advisers and consultants so that they can support your child's schooling.
- We share students' school email addresses with careers advice websites such as Unifrog so that students can use these to help with choices when they leave our school.
- When your child takes public examinations (e.g. GCSEs) we will need to share information about them with examination boards.
- Depending on where your child will go after leaving us we may need to provide their information to other schools, universities or potential employers. For example, we may share information about exam results and provide references.
- We share student data with other schools or provisions when students have a placement with that provision.
- We share student names, dates of birth, contact details for parents/carers, SEN information, medical information, assessment data and attendance data with other schools in The Futures Trust and other Consortia schools when students attend them for some of their subjects.
- We may also engage contractors to provide services for the school.
- We share student names, classes, and students' school email addresses with on-line learning resources, for example MyMaths, UpLearn, Timetables Rockstars and Bedrock Learning.
- We may share medical and SEND information with peripatetic music and sports coaches to ensure the safety and well-being of students during these lessons.
- The student's family and representatives.
- Our regulator, Ofsted.
- Conferencing software for home work and home learning, including Google Classroom and Microsoft Teams
- Charities and voluntary organisations who provide a range of support to students
- Financial organisations
- Our auditors who may need to review student data returns
- Survey and research organisations
- Security organisations
- Health and social welfare organisations such as CAMHS who provide specialist support to our students.
- Professional bodies

Some more specific apps and software that we use and share data with:

- Information Management software, including SIMS and Wonde
- CPOMS (Safeguarding software)

We do not share information about our students or parent/carer/carers/carers 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 Futures Trust 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).

How long do we keep your information for?

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

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

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

Transferring data internationally

Where we transfer personal data to a country or territory outside the UK, we will do so in accordance with data protection law.

What are your rights with respect of your personal information?

Under data protection law, parent/carer/carers and students 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 Officer at Warwickshire Legal Services via email at 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.**

In certain circumstances where President Kennedy School/The Futures Trust 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 school/academy trust to inform them of their reasons for their objection. The school/academy trust will consider the reasons for any objection and assess the risk to the individual against the purposes for the processing. In the event the President Kennedy School/The Futures Trust is unable to comply with an objection, we will ensure we can demonstrate compelling legitimate grounds to continue with the processing.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- 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 by contacting the school Data Champion:

Rebecca Fawcett at Fawcett@pks.coventry.sch.uk or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Review

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated in September 2023. This privacy notice is reviewed annually or earlier in response to statutory changes.

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
Student's full name	The Education (information about Individual Students) (England) Regulations 2013 Regulation 3 (2)	N/A	Third parties listed above School to which student has transferred	Legal Obligation Public Task
Student's gender	The Education (information about Individual Students) (England) Regulations 2013 Regulation 3 (2)	N/A	Third parties listed above School to which student has transferred	Legal Obligation Public Task
Student's date of birth	The Education (information about Individual Students) (England) Regulations 2013 Regulation 3 (2)	N/A	Third parties listed above School to which student has transferred	Legal Obligation Public Task
Student's home address	The Education (information about Individual Students) (England) Regulations 2013 Regulation 3 (2)	N/A	Third parties listed above School to which student has transferred	Legal Obligation Public Task
Student's first language	The Education (information about Individual Students) (England) Regulations 2013 Regulation 3 (2)	N/A	Third parties listed above School to which student has transferred	Legal Obligation Public Task
Student's medical/dietary/allergies record	The Education (information about Individual Students) (England) Regulations 2013 Regulation 3 (2)	Necessary for preventative or occupational medical care	Third parties listed above Department for Education – school census School to which student has transferred	Legal Obligation Vital Interest
Student's date of admission to school	The Education (information about Individual Students) (England) Regulations 2013	N/A	Local Authority School to which student has transferred	Legal Obligation
Student's last school attended (name and address)	The Education (information about Individual Students) (England) Regulations 2013 Regulation 5	N/A	Local Authority School to which student has transferred	Legal Obligation

Information Type	Relevant legislation	Special Category–additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Student's national curriculum year group	The Education (information about Individual Students) (England) Regulations 2013 Regulation 3 (2)	N/A	Local Authority Third parties listed above School to which student has transferred	Legal Obligation Public Task
Unique Student number	The Education (information about Individual Students) (England) Regulations 2013 Regulation 3 (2)	N/A	Local Authority School to which student has transferred Capita	Legal Obligation Public Task
Eligibility for Free School Meals	The Education (information about Individual Students) (England) Regulations 2013 Regulation 3 (2)	N/A	Local Authority School to which student has transferred Taylor Shaw catering	Legal Obligation Public Task
Mode of travel to school (if applicable)	The Education (information about Individual Students) (England) Regulations 2013 Regulation 3 (2)	N/A	Local Authority School to which student has transferred Capita	Legal Obligation Public Task
Proficiency in English	The Education (information about Individual Students) (England) Regulations 2013 Regulation 3 (2)	N/A	Local Authority School to which student has transferred DFE (School Census)	Legal Obligation
Safeguarding information	Education Act 2002, section 175 Children's Act 1989, Section 17, 47, 83. Children's Act 2004, Section 11	N/A	Local Authority School to which student has transferred	Legal Obligation
Whether a student is looked after and the Local Authority by whom the student is looked after	The Education (information about Individual Students) (England) Regulations 2013 Regulation 3 (2)	N/A	Local Authority School to which student has transferred	Legal Obligation
Where a student has been but is no longer looked after, the type of order resulting in them no longer being looked after	The Education (information about Individual Students) (England) Regulations 2013 Regulation 3 (2)	N/A	Local Authority School to which student has transferred	Legal Obligation
Special Educational	The Education (information about	N/A	Local Authority	Legal Obligation

Information Type	Relevant legislation	Special Category–additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Needs status, start date, details of needs and provision	Individual Students) (England) Regulations 2013 Regulation 3 (2) Children's and Families Act 2014, section 69		School to which student has transferred	
Admissions Register	Education (Student Registration)(England) Regulations 2006, Regulation 4, 10, 11, 14 and 15	N/A	OFSTED Local Authority	Legal Obligation
Details of exclusions: start and end dates, number of sessions, fixed length/permanent and reason for exclusion	The Education (information about Individual Students) (England) Regulations 2013 Regulation 3 (2)	N/A	OFSTED Local Authority	Legal Obligation
Educational Record	Education (Student Information) (England) Regulations 2005, Regulation 5 and 6	N/A	Local Authority School to which student has transferred	Legal Obligation
Attendance records including whether absence was authorised/ unauthorised and reason for absence	The Education (information about Individual Students) (England) Regulations 2013 Regulation 3 (2)	N/A	Local Authority School to which student has transferred	Legal Obligation
School Census	Education Act 1996, Sections 537 & 537A, and accompanying regulations	N/A	Department of Education	Legal Obligation
Parent/carer's names and address	The Education (Student Information) (England) regulations 2006 Regulation 5 (1) (c)	N/A	Department of Education	Legal Obligation
Parent/carer's telephone number (if student usually resides with them)	The Education (Student Information) (England) regulations 2006 Regulation 5 (1) (c)	N/A	Department of Education	Legal Obligation
Emergency Contact Details	Education (information about individual students) (England) Regulations 2013, Regulation 5.	N/A	Healthcare professionals or emergency services	Vital Interest
Curricular Record including Assessment and achievement data	Education (Student Information) (England) Regulations 2005, Regulation 4	N/A	OFSTED Capita Local Authority School to which	Legal Obligation

Information Type	Relevant legislation	Special Category–additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
			student has transferred	
Common Transfer File	The Education (Student Information) (England) regulations 2006 Regulation 5 (1) (c)	N/A	School to which student has transferred	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, including allergies	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent'	Emergency services Relevant School staff, i.e. Teachers/First Aiders	Vital Interest
Religious beliefs	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent'	Emergency services	Vital Interest
Safeguarding and promoting welfare of students.	N/A	Local Authority Police Health and Welfare Professionals	Legal Obligation Vital interest

Table 3 - Personal information we are required to process with the consent of the individual to whom that information ‘belongs’

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Student’s full name	N/A	Third parties listed above School to which student has transferred	Consent
Student’s gender	N/A	Third parties listed above School to which student has transferred	Consent
Student’s date of birth	N/A	Third parties listed above School to which student has transferred	Consent
Student’s first language	N/A	Third parties listed above School to which student has transferred	Consent
Student’s religion	Data Subject has given explicit consent	Third parties listed above School to which student has	Consent

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
		transferred	
Student's ethnicity	Data Subject has given explicit consent	Third parties listed above School to which student has transferred	Consent
Student's national identity, country of birth, nationality	N/A	Third parties listed above School to which student has Transferred	Consent
Parent/carer's contact details	N/A	Third parties listed above School to which student has transferred ParentPay – online payment system	Consent
Student's images (including video recordings)	N/A	Third parties listed above School to which student has transferred	Consent
Parent/carer name, date of birth, National Insurance number, 30 hours eligibility code (Nursery Children only)	N/A	Local Authority Synergy Data base (Nursery students only)	Consent

Table 4 - Personal information we are required to process because it is necessary to do so in order to perform a public task

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Student information i.e. name, Parent/carer detail, Emergency Contact details	N/A	Department of Education for the school census School to which student has transferred	Public task Legal Obligation
Academic Progress data	N/A	Local Authority OFSTED Parent/carer Health agencies, such as Speech Language	Public task Legal Obligation
Safeguarding information, Medical, Special Education Needs	Necessary for preventative or occupational medical care	CPOMS CAMHS Department of Health and Social Care NHS Emergency Services Peripatetic Teachers Taylor Shaw Caterers	Vital Interest Legal Obligation
Educational and Safeguarding Information used internally for the	N/A	CPOMS Department of Health and Social Care NHS	Public task Legal Obligation

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
purpose of educating and protecting the welfare of children		Emergency Services Peripatetic Teachers	
Dietary restrictions	Necessary for preventative or occupational medicine	Taylor Shaw Caterers	Vital Interest
Medical information including allergies	Necessary for preventative or occupational medical care	Taylor Shaw Caterers NHS Emergency Services	Vital Interest
FSM entitlement		Department for Education Local Authority	Legal Obligation Education Act 1996, section 512 – requirement to provide free school meals if the student is eligible
Student Name, Groups, Gender, Registration Group, Ethnicity	Necessary for statistics, archiving and research	Compass+ (Careers and Enterprise Company)	Public Task

Table 5 - Personal information we process because we have a legitimate interest

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