Ambition Education Trust

AET Privacy Notice for Parents, Carers, Students & Children over the age of 13 Policy

Policy Group	E	Data, IT, GDPR & Security
Title	E2p app	AET Privacy Notice for Parents, Carers, Students & Children over the age of 13
Trust sub-committee		Resources
Last reviewed		October 2024 (updated June 2025 - insert new section 5)
Next scheduled review		October 2028 (review date updated Sept 25)
Co-ordinated by		Director of IT

1 Data Protection Regulations 2018

We, the Ambition Education Trust (AET) are data controllers for the purposes of the General Data Protection Regulations (GDPR). The purpose of this document is to conform with your legal right to be informed about how the Trust and its schools collects, stores, uses or shares any information held about you or your child. For the purpose of this document, 'pupil information' includes any relevant details about parents, carers or persons responsible for the child/student, and references to 'school' can include information held at your child's school or by the AET.

2 Why do we Collect and use Pupil Information?

2.1 Why do we collect and use pupil information? Under Article 6 of the General Data Protection Regulation (GDPR), we collect and use information because we are legally required to collect some information about pupils and staff and we need to process this information due to our legal obligation (6,c) to provide an education to our pupils. This includes sharing information with exam boards, other schools and the Department of Education (DfE) where necessary. Our operation necessitates the use of contracts (6,b) including home-school contracts and contracts with staff and suppliers. In addition, due to our safeguarding responsibilities, we also collect information for the reason of vital interest (6,d) where processing is necessary to protect someone's life. CCTV footage is recorded and held according to school policy. Occasionally we collect and process data as a requirement for a public task (6,e), which could include collecting evidence of our duty to educate children, in the form cloud tools such as Google Extended Services, or the capture of images/video/sound at school events, such as sports day and concerts/productions at our schools.

2.2 Under Article 6 and Article 9 of GDPR, where the above lawful bases do not allow us to collect essential personal information, we will use **consent** (6,a) where the data subject has given consent to the processing of his or her personal data for one or more specific purposes.

2.3 We may receive information about them from their previous school, the Department for Education (DfE) and Hertfordshire County Council. We hold this personal data to:

- 2.3.1 support the learning in our schools
- 2.3.2 monitor and report on pupil progress
- 2.3.3 provide appropriate pastoral care
- 2.3.4 assess the quality of our services
- 2.3.5 keep our pupils/students and staff safe
- 2.3.6 comply with the law regarding data sharing

3 The Categories of Information that we Collect, Hold and Share Include:

Personal details (such as name, Unique Pupil Number and address), national curriculum assessment results, attendance information (such as sessions attended, number of absences and absence reasons), any exclusion information, where they go after they leave us, personal characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility), any special educational needs they may have as well as relevant medical information. Sensitive personal information may also be processed for safeguarding purposes (on the Legal Basis of **Vital Interest**) at any time. Explicit consent would be sought by the appropriate school, if biometric data was to be collected/used.

4 Collecting Pupil Information

4.1 We collect pupil information by using registration forms, data collection forms (which may be used annually) or file transfer from previous schools.

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

5 Use of AI Technologies

The school may use AI-assisted technologies for administrative and educational purposes. For details on how AI is applied and safeguards in place, please see our AI policy.

6 Storing Data

6.1 An annual sweep of the school network will be used to ensure that data is removed from general access where appropriate and in accordance with the AET Data and Records Management Policy, or by individual school policy. We shred or destroy redundant data onsite.

6.2 Photographs, videos and sound media will be captured by the school using school equipment and in line with any consent granted.

6.3 Data is backed up onsite daily and external backup organised by our IT service provider (Sandringham School), including Bromcom. SIMS and Arbor. We maintain a supplier compliance log to ensure that Data Processors (our suppliers) are compliant and effectively safeguard your data. Physical Security information for Data Protection can be obtained from our individual school offices.

6.4 The Trust/Schools have robust processes in place to minimise the risk of data breaches. In the unlikely event of a Data Breach, there exists an internal Data Breach Procedure and documentation which would be followed. These documents are overseen by the Trust's Data Protection Officer (DPO) or specific school's DPO. In the event of a data breach, we would act in accordance with the General Data Protection Regulations 2018.

7 Data Retention

7.1 Data will be retained by the school for the duration of the pupil's time with us. We cannot agree to delete data during this time. Please see the separate Trust Data and Records Management Policy for further details.

7.2 We will agree to remove data held on pupils, if requested, after they have left us (provided we are not required to keep it due to ratified policy or law). We will have to send their information to a new school or education establishment if applicable.

7.3 We hold pupil data until they reach 25 years of age for pupils statemented pupils* (Data will be securely deleted in the academic year of their 25th birthday). Ordinarily, data will be

removed from general access two years after they have left each school, where educational records and/or child protection records have been passed to an alternative provision (or to Herts or another county or country). A yearly sweep of school documentation is carried out to ensure that such data is protected and removed from general access, where appropriate.

7.4 Some school data will be kept for 6 years – this includes financial accounting information (legal reasons) and Data Breach Logs.

**and children without SEN if there is a major incident (for example, a safeguarding or critical/medical incident requiring external agency support). We may be required to keep the entire file until the youngest child involved turns 25 years of age, or longer for specific and regulated incidents.*

8 Who do we Share Information with?

8.1 We will not give information about you or your child to anyone without your consent unless the law and our policies allow us to.

8.2 Where our school is involved in collaborative delivery with other schools and learning providers, pupil information may also be shared to aid the preparation of learning plans and the use of data to achieve the objectives identified above or with schools that the pupil attends after leaving us. We need to share information, on occasion with (but not limited to) Virtual Schools, Education Psychologist, transfer schools, Social Services Assessment Team, Children's Services, school governors/trustees, local authority support services including the NHS, police and courts as necessary, and other health related assessment teams including disability allowance. We are required, by law, to share some information with the Department for Education (DfE). This information will, in turn, then be made available for the use by the Local Authority. Additionally, the curriculum may require the use of third party web-based learning platforms, if GDPR compliant. We may share information with our Parents' Association if we have your consent.

9 Why we Share Information

9.1 We are required to share information about our pupils with the (DfE) under regulation 4 and 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

9.2 Whilst we share information as an ongoing school management requirement, which would include non-standard operational activity such as promoting the school and complaints/legal proceedings as required, we do not share information about our pupils with anyone without your consent unless the law and our policies allow us to do so.

10 Safeguarding

10.1 GDPR does not prevent, or limit, the sharing of information for the purposes of keeping children safe. Legal and secure information sharing between schools, Children's Social Care, and other local agencies, is essential for keeping children safe and ensuring they get the support they need.

10.2 Information can be shared without consent if to gain consent would place a child at risk. Fears about sharing information must not be allowed to stand in the way of promoting the welfare and protecting the safety of children. As with all data sharing, appropriate organisational and technical safeguards should still be in place.

11 Data Collection Requirements

11.1 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/datacollection-and-censuses-for-schools.

11.2 If you need more information about how our local authority and/or DfE collect and use your information, please visit:

11.2.1 our local authority at https://www.hertfordshire.gov.uk/about-the-council/legal/privacy-policy/privacy-policy.aspx

11.2.2 the DfE website at https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data

12 How Government Uses Your Data

12.1 The pupil data that we lawfully share with the DfE through data collections:

12.1.1 underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.

12.1.2 informs 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).

12.1.3 supports 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

13 The National Pupil Database (Npd)

13.1 Much of the data about pupils in England goes on to be held in the National Pupil Database (NPD).

13.2 The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department.

13.3 It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

13.4 To find out more about the NPD, go to: https://www.gov.uk/government/publications/nationalpupil-database-user-guide-and-supporting-information

13.5 To contact DfE: https://www.gov.uk/contact-dfe

14 Requesting Access to your Personal Data

14.1 Under data protection legislation, parents, carers have the right to request access to any information that we hold about them. To make a request for your personal information, or be given access to your child's educational record, contact the appropriate school office or email the Data Protection Officer (see 'Contact' below). Please be aware that in certain situations such as, but not restricted to safeguarding, this data may not be disclosed.

14.2 You also have the right to:

14.2.1 object to processing of personal data that is likely to cause, or is causing, damage or distress

14.2.3 prevent processing for the purposes of direct marketing

14.2.4 object to decisions being taken by automated means

14.2.5 in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed

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

14.2.7 withdraw any consent that you have provided**

14.3 To find out more about your rights, visit https://ico.org.uk/your-data-matters/

***Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.*

15 No Fee Usually Required

You will not usually have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

16 Cookies

Our website uses Cookies to track visits to our website but we do not use it to identify you or for marketing purposes. You do not have to use our website as the information can be provided to you by the school office at your request.

17 Concerns

We understand that there are penalties for inadequately protecting your data or for noncompliance with the GDPR. If you have a concern about the way we are collecting or using your personal data, you can raise your concern with us in the first instance or directly to the Information Commissioner's Office at https://ico.org.uk/concerns/
on 0303 123 1113
or via email by visiting https://ico.org.uk/global/contact-us/email/

18 Contact

18.1 If a parent/carer wishes to access personal data held about them or their child, please contact the appropriate school:

18.1.1 Ridgeway Academy: dpo@ridgeway.aetrust.uk
18.1.2 Verulam School: dpo@verulam.aetrust.uk
18.1.3 Sandringham School: dpo@sandringham.aetrust.uk
18.1.4 St Albans Girls School: dpo@stags.aetrust.uk
18.1.5 The Adeyfield Academy: dpo@adeyfield.aetrust.uk
18.1.6 Wheatfields Junior School: dpo@wheatfieldsjm.aetrust.uk
18.1.7 Wheatfields Infants' and Nursery School: dpo@wheatfieldsinfants.aetrust.uk
18.1.8 Garden Fields JMI: dpo@gardenfields.aetrust.uk
18.1.9 Skyswood Primary & Nursery School: dpo@skyswood.aetrust.uk
18.1.10 Beech Hyde Primary School: dpo@beechhyde.aetrust.uk
18.1.11 Ambition Education Trust: dpo@aetrust.uk

18.2 Additional Contact Details:
LA's Data Protection Office: Information Governance Unit
Room C1, County Hall, Pegs Lane, Hertford, SG13 8DQ
dataprotectionhertscc.gov.uk

18.3 QCA's Data Protection Officer
83 Piccadilly, London, W1J 8QA

18.4 DfE's Data Protection Office
Caxton House, Tothill St, London, SW1H 9NA
Ofsted Data Protection Office
Alexandra House, 33 Kingsway, London, WC2B 6SE

19 Policy Review – GDPR

This policy will be reviewed in full by Trustees every three years. We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

The policy was last reviewed and agreed by Trustees October 2024

Name	Alan Gray	Name	Deborah Strazza
Signature		Signature	
Date	22 October 2024	Date	22 October 2024
CEO		**Chair of Trustees**	

Ambition
Education Trust

www.ambitioneducationtrust.org