



**GREENWOOD ACADEMIES TRUST**

**Privacy Notice for Parents and Carers  
– use of your child’s  
personal data**

Document Owner:	Corporate Affairs Director
Reviewed:	August 2025

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## 1. Introduction

Under UK data protection law, individuals have a right to be informed about how our Academy, 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 in our Academies**.

This privacy notice applies while we believe your child is not capable of understanding and exercising their own data protection rights.

Once your child is able to understand their rights over their own personal data (generally considered to be Year 9 upwards, but this has to be considered on a case-by-case basis), you should instead refer to our Privacy Notice for Pupils to see what rights they have over their own personal data.

Our Trust, the Greenwood Academies Trust, is the 'data controller' for the purposes of UK data protection law.

## 2. The personal data we hold

We hold personal data about pupils in our Academies 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 your child includes but is not restricted to:

- Pupil name and contact details, contact preferences, date of birth, identification documents
- Unique pupil number
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Details of any behaviour issues or exclusions
- 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 your child 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 your child 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
- 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 your child's 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 your child's 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 your child's 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 your child's personal data for marketing purposes**

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

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by selecting the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

### **3.2 Use of your child's 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 your child's personal data for filtering and monitoring purposes**

While your child is in our Academy, 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 and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)
- Protect your child's welfare

## **4. Our lawful basis for using this data**

Under Article 6 of the General Data Protection Regulation (GDPR), our lawful bases for processing your child's personal data for the purposes listed in section 3 above are as follows:

- For the purposes of a) to f), in accordance with the 'public task' basis – we need to process data to fulfil our statutory function as an Academy;

- For the purposes of i) and j), in accordance with the 'legal obligation' basis – we need to process data to meet our responsibilities under law;
- For the purposes of obtaining photos or videos or use of CCTV, in accordance with the 'consent' basis – we will obtain consent from you to use your child's personal data; and
- For the purposes of c) and d), in accordance with the 'vital interests' basis – we will use this personal data in a life-or-death situation

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**

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 your child'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
- The NHS and other health authorities

## 6. How we store this data

We keep personal information about your child while they are attending our Academy. We may also keep it beyond their attendance at our Academy if this is necessary to comply with our legal obligations or to meet our regulatory requirements.

Our Trust Record Managements Policy sets out how long we keep information about pupils and can be found on your Academy website, under Policies.

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

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

## 7. Who we share data with

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

- Schools that your child may attend after leaving us
- Our local authorities
- Government departments or agencies
- Youth support services provider
- Department for Education
- Our regulator, Ofsted
- Suppliers and service providers:
  - a list of the external parties and suppliers who we share staff data with, and the type of data shared, is shown in the appendix to this document
- 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 relevant legislation.

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:

- › Your child's name and address
- › 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 your child 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 examination 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:

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

Where we transfer your child’s personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

## 8. Your rights

### 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.

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 your Academy in the first instance, or the DPO as detailed in section 9.

Once your child is able to understand their rights over their own data (generally considered to be Year 9 upwards, 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. 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 Year 9 upwards, 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, Concerns or Queries

We take 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 do this at any time by contacting the Trust's Data Protection Officer, Alison Hope, on:

[dataprotection@greenwoodacademies.org](mailto:dataprotection@greenwoodacademies.org)

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