ACHIEVING TOGETHER

FOUR STONES GATEWAY TRUST

PRIVACY NOTICE
FOR STUDENTS & THEIR FAMILIES

DATE POLICY WAS APPROVED	30.04.2025
DATE POLICY WILL BE REVIEWED	SPRING 2027
MEMBER OF STAFF WITH RESPONSIBILTY FOR REVIEW	Head of IT Services

Key Definitions

All policies incorporate the following schools or organisations within Four Stones Gateway Trust ('the Trust'):

- Clee Hill Community Academy
- Cleobury Mortimer Primary School
- Haybridge High School and Sixth Form
- Haybridge Teaching School Hub
- Haybridge SCITT
- King Charles I School
- Lacon Childe School
- SHaW (Shropshire, Herefordshire, and Wolverhampton) Maths Hub
- Stottesdon CofE Primary School
- TDMS (The De Montfort School)
- Any other schools or organisations that may join the Trust from time to time and not listed above.

The terms Academy, School, Organisation and Trust are considered interchangeable in the context of all Trust policies.

Where appropriate, in this policy the term:

"CEO" includes the Chief Executive Officer

"CFOO" includes the Chief Financial Officer

"Trust Senior Leadership Team" includes Executive Headteachers, Headteachers, strategic operational leads and Teaching School/SCITT Directors.

"Headteacher" includes the appropriate School Headteacher.

"Trustees or Trust Board" are appointed Trustees who oversee the business of Four Stones Gateway Trust, agreeing the overarching strategic direction and ensuring robust governance.

"Local Academy Boards (LAB)" are appointed Governors at a local level associated with the Trust's Worcestershire Schools. LAB Governors act as advocates for their school's Safeguarding, SEND, Standards and Stakeholder engagement.

"Local Governing Bodies (LGB)" are appointed Governors at a local level associated with the Trust's Shropshire Schools. LGB Governors are advocates for their school's Safeguarding, SEND, Standards and Stakeholder engagement.

"Chair" responsible for leading the board and ensuring its effectiveness.

"Stakeholders" are any individuals or companies who are invested in the welfare and success of the Trust and/or School and its students, including staff members, students, parents, community members, LAB, LGB or Trust members, trade unions, local business leaders etc.

What is a Privacy Notice?
The Data Protection Act 2018 (UK GDPR) gives everyone the right to be informed about how their information is used by organisations. This Privacy Notice explains how we use information about our students and their families. If you can be identified from the information we hold, then this is known as "personal data."

This Privacy Notice explains:
- why we use your personal data.
- the reasons we need to do this.
- what kinds of personal data we use
- where we collect your personal data from
- who we will share your personal data with
- how you can find out more.

Who processes your information?
Four Stones Gateway Trust (the Trust) is the "Data Controller" of personal data. This means that the Trust and its academies are responsible for deciding how to use the personal information we hold about our students and their parent/carers.

The Trust is registered with the Information Commissioners Office: ZA521971

We refer to information that identifies you as "personal data." When we use your personal data in different ways, this is called "processing." The Data Protection Act (2018) outlines how personal data should be protected and processed appropriately by organisations including schools.

All staff employed by the Trust receive data protection training so that they understand how to use personal data appropriately.

Where we choose to share your information with people who provide essential systems and services to our academies, we ensure that the same data protection standards are in place. If sharing your information with service providers is not essential, we will always ask for your consent (permission) before this takes place.

The Trust has a Data Protection Officer (provided by Services 4 Schools Ltd). Their role is to oversee and monitor our Trust's data protection procedures, and to ensure they are compliant with data protection legislation. The data protection officer can be contacted by emailing: DPO@fourstonesgateway.org.uk

The personal data we hold for students include:
- Personal identifiers and contacts (such as name, date of birth, address, phone numbers, unique pupil number, contact details, identification documents)
- Images (such as photographs, videos, and CCTV images)
- Attendance Information (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- Safeguarding information (such as court orders, incident logs and professional involvement)
- Assessment and attainment (such as exam and test results, statutory Key Stage, and teacher assessments)
- Behavioural information (such as achievement and behaviour points, incidents, interventions, exclusions, and any relevant alternative provision put in place)
- Destination information including university attended and employment taken after leaving school.

We may also collect, store, and use information about you that falls into "special categories" of more sensitive personal data. This may include information about (where applicable):
- Special educational needs (including the needs and ranking)
- Characteristics (such as ethnicity, language, and free school meal eligibility)
- Medical and administration (such as doctors' information, health, dental health, allergies, medication and dietary requirements)
- Biometric information (which allows students to use our cashless catering systems)

The personal data we hold for parents/families include:

- Personal identifiers and contacts (such as name, address, phone numbers, email addresses, National Insurance number)
- Financial and meal management information, e.g. account and transactional information for school meals and eligibility for free school meals
- Information pertaining to home life where appropriate, e.g. where a student is identified as having a mental health issue or there are safeguarding concerns.

Why we collect and use your information.

Most of the information we collect about students and their families is used to help perform our duties as a public authority. These include:

- To support student learning (onsite and remote)
- To monitor and report on student progress.
- To provide appropriate pastoral care
- To provide access to services we have commissioned to support students.
- To keep students safe when learning online
- To assess the quality of our service
- To comply with the law regarding data sharing
- To keep children safe (safeguarding, health, and safety of students)
- To meet the statutory duties placed upon us for the Department for Education (DfE) data collections.

Our lawful basis for using this data.

We only collect and use personal information about students and their families when the law allows us to. Most commonly, we use it where we need to:

- We need to comply with a legal obligation.
- We need it to perform an official task in the public interest.

Less commonly, we may also process students' personal data in situations where:

- We have obtained consent to use it in a certain way.
- We need to protect the individual's vital interests (or someone else's interests)

We also collect and use personal data where it is necessary to meet the legal responsibilities set out in data protection legislation, other UK law and regulation that applies to schools. These include the following:

- Education Act 2011
- Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013
- Keeping Children Safe in Education regulations

We may also need to share your personal data with other official bodies, or organisations where we are required to by other UK law.

If we would like to use your information for another reason, then we will ask for your permission (consent) before doing so. When we ask for consent, we will explain what your information will be used for, by who and what choices you have about how it is used.

Collecting Student Information

We collect Student information via registration forms at the start of the school year or Common Transfer File (CTF) or secure file transfer from previous school.

Student data is essential for the schools' operational use. Whilst most of the student information you provide to us is mandatory, some of it requested on a voluntary basis. To comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain student information to us or if you have a choice in this.

Storing your data

Personal data relating to students and their families is stored in line with the Trust's records management policy and procedure. This policy is based on retention guidance published by the Information Records Management Society (IRMS) in their toolkits for schools and academies.

In accordance with the Data Protection Act, the Trust does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected.

We are required to retain your child's information for 25 years from their date of birth as stated in section 2 of the Limitation Act 1980. If your child leaves the school at 16, then we will retain their student record for a further 9 years. If your child leaves the school at 18, then we will retain their student record for a further 7 years.

Your child's information is stored securely and at the end of the retention period is disposed of in a secure way. Our methods of disposal are in accordance with government guidance and are conducted in a way that ensures that reconstruction is highly unlikely.

We will also retain personal data in the form of images, registers, and examples of work for the purposes of archiving and as a historical record of school life. This information may later be published in school literature, displays or external media. In this case, the personal data we retain will be proportionate and limited to what is necessary.

Who we share information with
We do not share information about our students with anyone without consent unless the law and our policies allow us to do so. We routinely share student information with:

- The Department for Education
- Educators and examining bodies.
- Ofsted
- Our local authorities – Shropshire or Worcestershire - to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusion.
- Other schools within the Trust
- Other schools within our sixth form collaboration (Years 12 and 13 students only)
- Other education providers
- Students' destinations upon leaving the school.
- The NHS (including the School Nursing Service, Speech, and Language Therapists)
- Other agencies i.e. Social Care, Police, Public Health England
- The system we use for managing student welfare.
- The systems we use for active monitoring and filtering of online activities.
- The systems we use to help manage school finance.
- The cashless payments systems available to parents
- Our door entry systems
- The systems and online resources we use to help deliver the curriculum.
- The systems we use to manage student information.
- The systems we use to help communicate with parents.
- The providers of therapeutic and counselling support to our schools
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

The information that we share with these parties includes the following:
- Personal information – names, addresses, dates of birth, gender, contact details.
- Student assessments- end of Key Stage assessment and results
- Attendance Information - number of absences at school
- Safeguarding information -Where this is necessary.
- Relevant medical information
- Information relating to SEND.
- Behavioural information – number of exclusions
- Biometric information (only where you have given explicit consent)

Department for Education (DfE)
The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our students with the

Department for Education (DfE) either directly or via our local authority for the purpose of those data collections, under regulation five of The Education (Information About Individual Pupils) (England) Regulations 2013.

All data is transferred securely and held by the Department for Education (DfE) under a combination of software and hardware controls, which meet the current government security policy framework.

For more information, please see '*How Government uses your data'* section.

Making Choices About Your Personal Data (consent)
Where students or parents have given, us consent to do so, we may send you messages by email or text promoting school events, campaigns, charitable causes, or services that you might be interested in.

Where these messages are optional, you can withdraw or 'opt out' by clicking on the 'Unsubscribe' link at the bottom, or by contacting us (see 'Contact us' below).

Use Of Your Personal Data in Automated Decision Making and Profiling
We don't currently put students' personal data through any automated decision making or profiling process. This means we don't make decisions about you using only computers without any human involvement.

If this changes in the future, we will update this notice to explain the processing to you, including your right to object to it.

Transferring Data Internationally
Where we share data with an organisation that is based outside the UK, we will protect your data by following data protection law.

Youth Support Services
Once our students reach the age of 13, we also pass student 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/carer can request that only their son/daughter's name, address and date of birth is passed to their local authority or provider of youth support services by informing:
King Charles I School: on 01562 512880 or via email at office@kingcharles1.worcs.sch.uk;
Haybridge High School: on 01562 886213 or via email at office@haybridge.worcs.sch.uk;
TDMS on 01386 442060 or via email at office@tdms.worcs.sch.uk

This right is transferred to the student once he/she reaches the age 16.

Your Information Rights
Data Protection law provides you with certain rights.

Requesting access to your personal data
You (or your parent) have the right to request access to information about you that we hold.
If we do hold information about you, we will:

- Give you a description of it.
- Tell you why we are holding and using it, and how long we will keep it for
- Explain where we got it from, if not from you or your parents
- Tell you who it has been, or will be, shared with
- Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)
- Give you a copy of the information.

To make a request to access your personal information, please contact our Data Protection Officer by emailing DPO@fourstonesgateway.org.uk ,

or in writing to: Four Stones Gateway Trust, Love Lane, Cleobury Mortimer, Shropshire, DY14 8PE.

Please address letters: For the attention of the Data Protection Officer.

We may require you to provide proof of your identity before we can help with your request.

Your Other Information Rights:

- **The right to know how your information is being used** – We uphold this by publishing Privacy Notices and letting you know how your information will be used when we collect it.
- **The right to have inaccurate information amended** - We uphold this right by asking you to review the information we hold on record and updating information if you provide evidence to show it has changed.
- **The right to have information removed or deleted from your records** – We uphold this right by removing or deleting your information that we are no longer required to keep.
- **The right to temporarily restrict how your information is used** - We uphold this right by not using information until we have confirmed what is accurate, unless it is necessary to do so.
- **The right to object to us using your data for certain purposes** – We uphold this by asking for your consent or permission to use your information for these purposes (including direct marketing and for scientific/historical research and statistics)
- **The right for important decisions about you not to be made solely by automated systems that use your information (like computer algorithms and AI**) – We uphold this right by letting you know if these systems are used and giving you a choice for these types of decisions to be reviewed.

Who to Contact

The Trust has a Data Protection Officer (provided by Services 4 Schools Ltd). Their role is to oversee and monitor our data protection procedures, and to make sure we are compliant with data protection legislation.

The Data Protection Officer is responsible for helping Students and Parents uphold their information rights.

You can contact our Data Protection Officer by emailing: DPO@fourstonesgateway.org.uk

or in writing to: Four Stones Gateway Trust, Love Lane, Cleobury Mortimer, Shropshire, DY14 8PE. Please address letters: For the attention of the Data Protection Officer.

Complaints or Concerns

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we have done something wrong.

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with our Data Protection Officer in the first instance. You can also raise a concern with the Information Commissioner's Office at https://ico.org.uk/concerns/

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

How Government uses your data

- The student data that we lawfully share with the Department for Education (DfE) through data collections:
- underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- informs 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Student Progress measures).
- supports 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

Data Collection Requirements

To find out more about the data collection requirements placed on us by the Department for Education (DfE) (for example; via the school census) go to https://www.gov.uk/education/data-collection-and-censuses-for-schools

The National Pupil Database (NPD)
Much of the data about pupils in England goes on to be held in the National Pupil Database (NPD).
The NPD is owned and managed by the Department for Education (DfE) 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 for Education (DfE).
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.

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

Sharing by the Department for Education (DfE)
The law allows the Department for Education (DfE) to share pupils' personal data with certain third parties, including:

- schools and local authorities
- researchers
- organisations connected with promoting the education or wellbeing of children in England.
- other government departments and agencies
- organisations fighting or identifying crime.
- For more information about the Department for Education's (DfE) NPD data sharing process, please visit: https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

Organisations fighting or identifying crime may use their legal powers to contact the Department for Education (DfE) to request access to individual level information relevant to detecting that crime.
For information about which organisations the Department for Education (DfE) has provided pupil information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the Police please visit the following website: https://www.gov.uk/government/publications/dfe-external-data-shares

How to find out what personal information the Department for Education (DfE) holds about you.
Under the terms of the Data Protection Act 2018, you are entitled to ask the Department for Education (DfE):

- if they are processing your personal data
- for a description of the data, they hold about you.
- the reasons they are holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department for Education (DfE), you should make a 'subject access request.' Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at the address below:
https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter

To contact the Department for Education (DfE): https://www.gov.uk/contact-dfe