PENK VALLEY ACADEMY TRUST

Privacy Notice for Pupil and Parents / Carers

Adopted by Trustees:	
Signed:	
Date:	Summer 2026
This policy is reviewed every three years by the Finance Audit and Risk Committee.	
Review date:	Summer 2029

COLLABORATION CHALLENGE CURIOSITY CARE

POLICY INFORMATION

Date of last review:	Summer 2026	**Review period:**	3 Years
Date ratified by Trustees:	Summer 2026	**Trustee committee responsible:**	Finance Audit and Risk
Policy owner:	Governance Professional and Executive Assistant	**Executive team member responsible:**	Governance Professional and Executive Assistant

Reviews/revisions

Review date	Changes made	By whom
June 2023 Summer 2026	Notice created. Updates	CH LMC

Equality and GDPR

All Penk Valley Academy Trust policies should be read in conjunction with our Equal Opportunities and GDPR policies.

Statement of principle – Equality

We will take all possible steps to ensure that this policy does not discriminate, either directly or indirectly against any individual or group of individuals. When compiling, monitoring and reviewing the policy we will consider the likely impact on the promotion of all aspects of equality as described in the Equality Act 2010.

Statement of principle – GDPR

Penk Valley Academy Trust recognises the serious issues that can occur as a consequence in failing to protect an individual adult's or child's personal and sensitive data. These include emotional distress, physical safety, child protection, loss of assets, fraud and other criminal acts.

Penk Valley Academy Trust is therefore committed to the protection of all personal and sensitive data for which it holds responsibility as the Data Controller and the handling of such data in line with the data protection principles and the Data Protection Act (DPA)/GDPR.

Penk Valley Academy Trust will be referred to as **PVAT** for the remainder of the document which includes all schools who are members of PVAT, business operations and centralised services.

PRIVACY NOTICE FOR PUPIL AND PARENTS /CARERS

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Aim

PVAT collects data and information about our pupils and parents / carers so that we can run effectively as a Trust. We are an Academy Trust and the Data Controller for the data we process on pupils attending our schools. It also explains your right to raise concerns or complaints about how your personal data is handled.

This privacy notice explains how and why we collect pupil and parent / carer data, what we do with it and what rights parents and pupils have.

The types of information held by us

We currently collect and process the following information:

- Personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- Characteristics (such as ethnicity, language, pupil premium and free school meal eligibility)
- Safeguarding information (such as court orders and professional involvement)
- Special educational needs (including the needs and ranking)
- Medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- Attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- Assessment and attainment (such as key stage 1 and phonics results)
- Behavioural information (such as exclusions and any relevant alternative provision put in place)

How we collect the information and why we have it

We collect information about pupils and parents / carers before they join PVAT and update it during their time on the roll as and when new information is acquired. It is used to:

- To support pupil learning and progress
- To run PVAT safely and effectively and protect the welfare of everyone in PVAT
- To meet our legal obligations, such as data sharing

Most of the personal information we process is provided to us directly by you but we also receive personal information when pupils join PVAT from:

- Other schools and nursery settings
- From the local authority

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for this processing are:

- Your consent. You are able to remove your consent at any time. You can do this by contacting the Data Protection Lead (DPO@penkvalley.co.uk)
- We have a contractual obligation
- We have a legal obligation;
- We need it to perform a public task;
- We have a vital interest;

- We have a legitimate interest.

Some personal information requires extra protection as it is considered more sensitive. This includes race, ethnicity, religious beliefs, medical conditions, genetic information and biometric data, criminal convictions.

If we are processing special category data, our lawful bases will also include one of the following:

- We have explicit consent
- To meet our obligations as a controller or those of data subjects
- To meet our public interest task of keeping pupils safe

What we do with the information

We use the information you have given us to:

- Support pupil learning
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Assess the quality of our services
- Comply with the law regarding data sharing
- Protect the welfare of pupils and others in PVAT
- Run the PVAT safely and effectively
- Promote PVAT, including taking photographic images
- Communicate with parents / carers.

We may share this information with:

- Schools that pupils attend after leaving us
- Our local authority, Staffordshire County Council
- The Department for Education (DfE) (statutory data collections) – please see Section 5 for more information.
- PVAT Trustees / Governors
- Companies providing services to PVAT, e.g. catering, photography, communication services

From time to time, we may also share pupil information with other third parties including the following:

- The Police and law enforcement agencies
- NHS health professionals including the school nurse
- Educational psychologists
- Education Welfare Officers
- Courts, if ordered to do so
- Prevent teams in accordance with the Prevent Duty on schools.

In the event that we share personal data about pupils with third parties, we will provide the minimum amount of personal data necessary to fulfil the purpose for which we are required to share the data.

Department of Education (DFE)

The Department of Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our pupils with the Department for Education (DfE) either directly or via our local authority for the purpose of those data collections, under: Regulation 5 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 Security Policy Framework: protecting government assets Security policy framework: protecting government assets - GOV.UK (www.gov.uk).

The pupil data that we lawfully share with the Department of 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 Pupil 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)

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

Much of the data about pupils in England goes on to be held in the National Pupil Database (NPD). To find out more about the NPD, go to: https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information.

How we store your information

A significant amount of personal data is stored electronically, for example, on our MIS (management information system) database and curriculum network. Some information may also be stored in hard copy format in lockable filing cabinets.

We hold pupil and parent / carers' data in line with our retention schedule which is available from each school office.

Your data protection rights

Under Data Protection Law parents / carers and pupils have the right to request access to information about them that we hold (a Subject Access Request).

To make a request for your personal information or to be given access to your child's educational record, please contact the Data Protection Lead (DPO@penkvalley.co.uk). Where a child does not have the maturity to make their own requests for personal data, parents may do so on their behalf in a primary school setting.

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
- A right to seek redress either through the ICO or through the courts

Under GDPR you are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Parents of pupils who attend PVAT have a separate statutory right to access their child's educational record. Upon receipt of a written request for a pupil's educational record, PVAT will respond to it within 15 school days. This is an independent legal right of parents which falls outside of the GDPR.

If you are dissatisfied with how your request has been handled, you have the right to make a complaint to PVAT or to the Information Commissioner's Office (ICO).

We aim to respond to all requests without undue delay and within the statutory timeframes. During periods where the school is closed, response times may be impacted; however, we will ensure all requests are handled in accordance with data protection legislation.
For further information about how we handle subject access requests, please see our Data Protection Policy.

Any concerns

We take any concerns about how we collect and use personal information very seriously.

If you have concerns about how we handle your or your child's personal data, you have the right to make a complaint to PVAT.

To help us investigate your concern quickly and efficiently, complaints should be submitted using our online form:
LINK TO ONLINE FORM

However, complaints can be made in any format, including by email, post, telephone or in person, and will be accepted regardless of how they are submitted.

We will acknowledge your complaint within 30 calendar days and investigate it without undue delay in accordance with Section 21 (Data Protection Complaints) of our Data Protection Policy.

You also have the right to make a complaint to the Information Commissioner's Office (ICO) at any time:

Website: www.ico.org.uk
Telephone: 0303 123 1113
Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF