



Privacy Notice: How we use Pupil Data

At Stephenson (MK) Trust the protected characteristics have been considered in the design of this policy. This policy has been obtained through a review of best policies and The Key.

Approved by:	Trust Board	Date: March 2025
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1. Introduction

Under data protection legislation, individuals have a right to be informed about how Stephenson MK Trust 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 and why we collect, store, and use personal data about pupils.

We, Stephenson MK Trust, are the 'data controller' for the purposes of data protection law. The Trust is registered as a data controller with the Information Commissioners Office (ICO). Our registration number is Z3202781.

Our Data Protection Officer is The Schools People (see below).

This Privacy Notice relates to Stephenson MK Trust, its Academies, and any Academies which join the Trust in the future (hereafter referred to as 'The Trust').

2. Types of Pupil Data We Collect

The categories of Pupil information that we collect, process, hold and share includes:

- Personal Identifiers such as name, unique pupil number, contact details, date of birth.
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Characteristics, such as language, eligibility for free school meals and Pupil Premium
- Special educational needs information including the needs and ranking
- Details of any support received, including care packages, plans and support providers
- Behavioural information including exclusions and detentions
- Attendance information (such as session attendance, number of absences, absence reasons and details of any previous schools attended)
- Safeguarding information (such as court orders and professional involvement)
- Photographs
- Data relating to your use of ITC systems including filtering and monitoring for the purpose of safeguarding
- CCTV images
- Details of where you move to after leaving us (your destination)
- Any other personal data we will inform you of from time to time.

We may also collect, store, and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Special characteristics including racial or ethnic origin
- Religious or philosophical beliefs and health
- Medical information including details of any medical conditions, including physical and mental health, GP contact details, allergies, medication, and dietary requirements
- Biometric data.

We may also hold data about pupils that we have received from other bodies, including other Schools and Academies, Social Services and Law enforcement agencies.

3. Why We Collect and Use This Information

We collect pupil information to safeguard and promote your welfare, to promote the objects and interests of the Trust, to facilitate the efficient operation of the Trust and to ensure that all relevant legal obligations are complied with. For example, we collect data to:

- support pupil learning and improve our teaching
- monitor and report on pupil progress
- provide appropriate pastoral care
- protect pupil welfare
- assess the quality of our services
- keep pupils safe
- carry out research
- comply with the law regarding data sharing
- carry out our legal obligations
- meet statutory duties placed upon us for DfE data collections

4. Collecting Pupil Information

We collect pupil information from:

- The admissions processes
- A pupil's previous setting (if relevant)
- Common Transfer files
- Assessment and attainment processes
- Attendance (routine register twice a day)
- Staff/peer observations and interactions with the pupil on a day-to-day basis
- Parent/Carer
- External partners, bodies, and agencies
- Police and the courts.

In addition, the Trust uses CCTV cameras around the site for security purposes and the protection of staff, pupils, and other stakeholders

Most of the information provided to us is mandatory, some of it is provided voluntarily. To comply with data protection legislation, we will inform parents whether you are required to provide certain information to us or if you have a choice in this and we will tell you what you need to do if you do not want to share this information with us.

5. The Lawful Bases on Which We Use This Information

We only collect and use personal data when the law and our policies allow us to do so.

We process general category data where:

- we need to comply with a legal obligation
- we need to perform a task in the public interest or for our official functions.

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

- we need to protect your vital interest or that of another person
- for our legitimate interest where the Trust is not acting in its official capacity.

We may process special category data:

- to protect the child's vital interests or those of another person, and where you/they are physically or legally incapable of giving consent
- if the information is manifestly made public by the parent (e.g. on social media)
- for the establishment, exercise or defence of legal claims, or whenever courts are acting in their judicial capacity
- where it is necessary for reasons of substantial public interest
- where it is necessary for reasons of substantial public interest in the area of public health
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

Some of the reasons listed above for collecting and using personal data overlap, and there may be several grounds which justify our use of this data.

6. Criminal Proceedings/Convictions and Child Protection/ Safeguarding Issues

This information is not routinely collected and is only likely to be processed by the Trust in specific circumstances. For example, if a child protection issue arises, or a pupil is involved in a criminal matter.

Where appropriate, such information may be shared with external agencies such as the child protection team at the Local Authority, the Local Authority Designated Officer (LADO) and/or the Police.

Such information will only be processed to the extent that it is lawful to do so, and appropriate measures will be taken to keep the data secure.

7. Consent

We may process personal information relating to the pupil without consent, in compliance with the above lawful bases, where this is required or permitted by law and our policies.

In limited circumstances, we may require written consent to allow us to process certain particularly sensitive data, or to use pupil images on our social media channels. If we do so require consent, we will provide full details of the information we would like and the reason we need it, so that careful consideration may be given to whether you wish to consent.

Where we rely solely on consent as the lawful basis for processing, consent may be withdrawn at any time (see below).

8. Storage and Retention

A significant amount of personal data is stored electronically. Some information may also be stored as a hard copy. All data is stored and processed following the Trust's **Data Protection Policy** and the **Information Security Policy**.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including to satisfy any legal, accounting, insurance or reporting requirements.

Details of retention periods for various categories of your personal information are available in our **Records Retention Schedule**.

9. CCTV

We have installed CCTV systems on some of our premises for the safety of staff, pupils, governors/trustees, and other stakeholders, and for the prevention and detection of crime.

Signs are displayed notifying you that CCTV is in operation.

All CCTV images will be retained for 30 days. After this period the images are permanently deleted unless they are required for an ongoing incident/investigation which has been identified. For example, if a crime has been observed and recorded, or the images are subject to a legal hold following a subject access request. In such cases, images will be retained for as long as necessary to support any internal or external proceedings.

10. Who Do We Share Pupil Information With?

We do not share pupil information with anyone without consent unless the law and our policies allow us to do so. We routinely share pupil information with:

- The Department for Education – to meet our legal obligations to report on Pupil progress
- Our local authority (Milton Keynes City Council) – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions, and to fulfil our public interest tasks such as the provision of free school meals
- A Pupil's home Local Authority (if different)
- National Pupil Database
- Youth Support Service.

Youth support services

Pupils aged 13+

Once our pupils reach the age of thirteen, we also pass pupil information to the Local Authority and/or provider of youth support services. They have responsibilities relating 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

The information shared is limited to the child's name, address, and date of birth. However, where a parent or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the pupil once they reach the age of 16.

Pupils aged 16+

We will also share certain information about pupils aged 16+ with the 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:

- post-16 education and training providers
- youth support services
- careers advisers.

For more information about services for young people, please visit our local authority website <https://www.milton-keynes.gov.uk/schools-and-lifelong-learning/CLMK/16-19-team-support-and-resources>.

Department for Education

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 pupils with the Department for Education (DfE) either directly or via our local authority.

All data is transferred securely and held by DfE under a combination of software and hardware controls that meet the current government security policy framework. For more information, please see '[How Government uses your data](#)' section, below.

Local Authorities

We may be required to share information about our pupils with the local authority to ensure that they can conduct their statutory duties under the Schools Admission Code, including conducting Fair Access Panels.

National Pupil Database (NPD)

We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school census.

Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the Department 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 exam boards.

The Department for Education may share information from the NPD with other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

For more information, see the Department's webpage on how it collects and shares research data. You can also contact the Department for Education with any further questions about the NPD.

All data is transferred securely and held by DfE under a combination of software and hardware controls that meet the current government security policy framework. For more information, please see '[How Government uses your data](#)' section, below.

We may occasionally also share pupil data with:

- your family and representatives – to carry out our public interest tasks such as reporting on pupil progress or being a contact if a pupil is ill
- educators and examining bodies – to carry out our public interest tasks in relation to examinations
- our regulator Ofsted which monitors many aspects of our public interest tasks
- our auditors – to meet our legal and public interest obligations relating to financial matters
- survey and research organisations
- health authorities – to carry out our public interest tasks and safeguard the vital interests of pupils
- security organisations – for our public interest tasks in relation to keeping pupils safe, keeping the site secure and preventing crime

- health and social welfare organisations – where this is covered by our public interest tasks or to safeguard the vital interests of pupils
- professional advisers and consultants – to help us carry out our public interest tasks
- charities and voluntary organisations – which may, for example, provide us with services or support our educational activities carried out in the public interest
- police forces, courts, tribunals – where this is necessary for the prevention and detection of crime, required by law or for purposes arising out of our public interest tasks such as safeguarding pupils
- professional bodies – to help us carry out our public interest tasks.

Third-party service providers

Limited personal data is shared with third-party service providers who require access to the data to deliver contracted services.

These third-party service providers act as data processors on the Trust's behalf. They are required to take appropriate security measures to protect your personal information in line with our policies and data protection legislation. We authorise these service providers to use personal data only as necessary to perform services on our behalf, or to comply with legal obligations if necessary.

11. Transferring Data Outside The UK

We do not routinely share data with organisations outside the UK. Where this may be necessary, we may transfer data with your explicit consent and with appropriate safeguards.

We will not transfer personal data outside the UK unless the transfer complies with the UK GDPR. This means that we cannot transfer any personal data outside the UK unless:

- The Secretary of State has decided that another country or international organisation ensures an adequate level of protection for personal data
- One of the derogations in the UK GDPR applies (including if an individual explicitly consents to the proposed transfer).

12. Data Security

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

In addition, we limit access to your personal information to those employees, consultants, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

13. Your Data Subject Rights

You have the right to:

- make a subject access request (SAR) (see below)
- withdraw your consent to the processing at any time
- ask us to rectify, erase or restrict the processing of your personal data, or object to the processing of it (in certain circumstances)

- prevent the use of your personal data for direct marketing
- challenge processing which has been justified based on public interest
- request a copy of agreements under which your personal data is transferred outside of the UK
- object to decisions based solely on automated decision-making or profiling. (the Trust does not use automated decision-making and/or profiling in any of its processes and procedures)
- prevent processing that is likely to cause damage or distress
- be notified of a data breach (in certain circumstances)
- ask for their personal data to be transferred to a third party in a structured, commonly used, and machine-readable format (in certain circumstances).
- make a complaint to the ICO.

For more information about your rights please see here [For the public | ICO](#)

14. Your Duty to Inform Us of Change

The personal information we hold about pupils must be accurate and current. Please keep us informed if personal information changes during your child's time with us.

15. Subject Access Requests

Under the data protection legislation a pupil's personal data, regardless of their age, belongs to the pupil, not the parent. In general, where a pupil is under the age of 12 years, parents may exercise individual rights on the pupil's behalf.

Where a pupil is age 12 *and* over, **and** considered mature enough to understand their rights under the data protection legislation, the pupil should make the access request themselves, or provide explicit consent for the parent to act on their behalf. Please see here for further information about children's rights. [What rights do children have? | ICO](#)

It would be helpful, though not mandatory, for access requests to be made in writing to the Trust, including:

- your name and address
- the pupil's name if you are making a SAR on behalf of your child
- email address and telephone number
- details of the information required.

For more information about making a SAR please see [Getting copies of your information \(SAR\) | ICO](#)

16. Exercising Other Data Subject Rights

If you wish to review, verify, correct or request the erasure of your child's personal information, object to the processing of their personal data, or request that we transfer a copy of their personal information to another party, please contact the Trust in the first instance ([details below](#)).

17. The Right to Withdraw Consent

Where you may have provided your consent to the collection, processing, and transfer of your child's personal information for a specific purpose, and there is no other applicable lawful basis for processing the data, you have the right to withdraw your consent for that specific processing at any time.

For Bridge Academy and MKPPRU, to withdraw your consent please write to:

Shelley Rowland

School Business Manager

Bridge Academy

Jonathans

Coffee Hall

Milton Keynes

MK6 5DE

shelley.rowland@bridgeacademy.org.uk

For Stephenson Academy, to withdraw your consent please write to:

School Business Manager

Stephenson Academy

Crosslands

Stantonbury

Milton Keynes

MK14 6AX

reception@stephensonacademy.org.uk

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

18. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you consider our collection or use of personal information is unfair, misleading, or inappropriate, or you have any other concerns about our data processing, please raise this with us in the first instance by contacting Lyndsay Preen, Head of Operations on 01908 889400.

If you have any concerns that we are not able to resolve to your satisfaction, you can contact our Data Protection Officer at DPOService@schoolspeople.co.uk

Alternatively, you can register your concern with the UK's data protection regulator - the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/your-personal-information-concerns/>
- Call 0303 123 1113
- Or write to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK 9 5AF

18. Changes to this Privacy Notice

This notice will be reviewed every year or as necessary in response to changes in the data protection legislation or our processing activities.

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 substantial changes.

19. Contact

If you would like to discuss anything in this privacy notice, please contact Lyndsay Preen, Head of Operations on 01908 889400.

20. How Government uses your data

The pupil 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 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)

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)

The NPD is owned and managed by the Department for Education (DfE) and contains information about pupils in schools in England. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

The data in the NPD is provided as part of the operation of the education system and is used for research and statistical purposes to improve, and promote, the education and well-being of children in England.

The evidence and data provide DfE, education providers, Parliament and the wider public with a clear picture of how the education and children's services sectors are working in order to better target, and evaluate, policy interventions to help ensure all children are kept safe from harm and receive the best possible education.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-npd-privacy-notice/national-pupil-database-npd-privacy-notice>

Sharing by the Department for Education (DfE)

DfE will only share pupils' personal data where it is lawful, secure, and ethical to do so. Where these conditions are met, 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 UK GDPR, 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're 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>

or

<https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

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