



BONITAS TRUST PRIVACY NOTICE – PARENTS, CARERS AND PUPILS

BONITAS MULTI-ACADEMY TRUST PRIVACY STATEMENT

Bonitas Multi-Academy Trust is committed to protecting the privacy and security of personal data. We collect and process personal information about students, parents, carers, staff, governors, trustees and visitors and carers across our schools to meet our statutory obligations, deliver education services, and safeguard those in our care. This privacy notice explains how personal data is collected, used, and shared by each school within the Trust, in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and related guidance.

Each school within Bonitas Multi-Academy Trust is a data controller for the personal data it holds, with the Trust acting as a joint controller where services, policies, or systems are delivered centrally. The Trust provides oversight, systems, and services to support data protection compliance.

PRIVACY NOTICE FOR PARENTS OR CARERS	PRIVACY NOTICE FOR STUDENTS
<p>Under data protection law, individuals have a right to be informed about how schools use 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.</p> <p>This privacy notice explains how we collect, store and use personal data about students.</p> <p>We, [Insert School Name], are the ‘data controller’ for the purposes of data protection law.</p> <p>We are part of Bonitas Multi-Academy Trust, which may also act as a data processor on our behalf.</p> <p>Our Data Protection Officer (DPO) is provided by TurnITon, on behalf of Bonitas Multi-Academy Trust.</p> <p>To contact the DPO, please contact [Insert School Contact Name and Position], who acts as the link for data protection matters at the school.</p> <p>We usually consider children aged 12 and above to have the maturity to understand and manage their own data rights, though this is assessed on a case-by-case basis.</p>	<p>You have a legal right to be informed about how our school uses any personal information that we hold about you. To comply with this, we provide a ‘privacy notice’ to you where we are processing your personal data.</p> <p>This privacy notice explains how we collect, store and use personal data about you.</p> <p>We, [Insert School Name], are the ‘data controller’ for the purposes of data protection law. Our school is part of Bonitas Multi-Academy Trust, which supports and oversees data protection compliance across its schools.</p> <p>Our Data Protection Officer is provided by TurnITon, on behalf of Bonitas Multi-Academy Trust.</p> <p>Primary Pupils - While you're in primary school, your parent or carer usually helps manage your data. When you're older, you'll be able to take charge of more of it yourself.</p> <p>Secondary students - If you have any questions or concerns about how your data is used, please contact [Insert School Contact Name and Position], who acts as the first point of contact for data protection matters at this school.</p>

THE PERSONAL DATA WE HOLD

Personal data that we may collect, use, store and share (when appropriate) about students includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents
- Admissions information
- Data for the administration of exams (*secondary only*)
- Attendance information
- Results of internal assessments and externally set tests
- Student and curricular records
- Characteristics, such as ethnic background, language, eligibility for free school meals, or special educational needs
- Details of any medical conditions, including physical and mental health
- Safeguarding information, including professional involvement
- Behavioural information, including detentions and exclusions
- Details of any support received, including care packages, plans and support providers
- Photographs
- CCTV images captured in school
- Biometrics (fingerprints) ((secondary only)- Where we use biometric data, we will always request written consent from a parent or carer. Students can also object, even if consent is given. If consent is refused, we will provide an alternative method.
- Data for the administration of visits and activities
- We may also hold data about students that we have received from other organisations; other schools, Local Authorities and Department for Education.

We hold some personal information about you to make sure we can help you learn and look after you at school.

For the same reasons, we get information about you from some other places too like other schools, the local council and the government. This information includes:

- Your contact details, date of birth
- Your attendance records
- Your test results
- Welfare or safeguarding information
- Your characteristics, like your ethnic background, language, or any special educational needs
- Details of any medical conditions you have
- Behavioural information, including detentions or exclusions
- Photographs
- CCTV images
- Your fingerprints - If we use your fingerprints, for example in the canteen or for access, we will always ask your parent or carer to give written permission first. Even if they agree, you still have the right to say no, and we will give you another way to do what you need.

WHY WE COLLECT AND USE THIS DATA	
<p>We collect and use this data to:</p> <ul style="list-style-type: none"> • Support student learning • Monitor and report on student progress • Provide appropriate pastoral care • Administer a cashless catering facility (<i>if applicable – secondary only</i>) • Protect student welfare, keep children safe • Assess the quality of our services • Administer the admissions process • Carry out planning, research and statistical analysis • Comply with the law regarding data sharing. 	<p>We collect and use this data to help run the school, including to:</p> <ul style="list-style-type: none"> • Get in touch with you and your parents or carers when we need to • Check how you're doing in exams and work out whether you or your teachers need any extra help • Track how well the school as a whole is performing • Look after your wellbeing.
OUR LEGAL BASIS FOR USING THIS DATA	
<p>We only collect and use students' personal data when the law allows us to. Most commonly, we process it where:</p> <ul style="list-style-type: none"> • We need to comply with a legal obligation • We need it to perform an official task in the public interest <p>Less commonly, we may also process students' personal data in situations where:</p> <ul style="list-style-type: none"> • 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). <p>Where we have obtained consent to use students' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.</p> <p>Some of the reasons listed above for collecting and using students' personal data overlap, and there may be several grounds which justify our use of this data.</p>	<p>We will only collect and use your information when the law allows us to. Most often, we will use your information where:</p> <ul style="list-style-type: none"> • We need to comply with the law • We need to use it to carry out a task in the public interest (in order to provide you with an education) <p>Sometimes, we may also use your personal information where:</p> <ul style="list-style-type: none"> • You, or your parents or carers have given us permission to use it in a certain way • We need to protect your interests (or someone else's interest). <p>Where we have got permission to use your data, you or your parents or carers may withdraw this at any time. We will make this clear when we ask for permission, and explain how to go about withdrawing consent.</p> <p>Some of the reasons listed above for collecting and using your information overlap, and there may be several grounds which mean we can use your data.</p>

COLLECTING THIS INFORMATION	
<p>Whilst the majority of information we collect about students is mandatory, there is some information that can be provided voluntarily.</p> <p>Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.</p>	<p>While in most cases you, or your parents or carers, must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data.</p> <p>We will always tell you if it's optional. If you must provide the data, we will explain what might happen if you don't.</p>
HOW WE STORE THIS DATA	
<p>We keep personal information about students whilst they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations.</p> <p>How long we keep your data</p> <p>We keep personal information about students only for as long as necessary to provide education and comply with our legal obligations. Our retention periods are based on guidance from the Information and Records Management Society (IRMS) and other statutory requirements.</p>	<p>We will keep personal information about you while you are a student at our school. We may also keep it after you have left the school, where we are required to by law.</p> <p>How long we keep your data</p> <p>We keep personal information about you only for as long as necessary to provide education and comply with our legal obligations. Our retention periods are based on guidance from the Information and Records Management Society (IRMS) and other statutory requirements.</p>
DATA SHARING	
<p>We do not share information about students with any third party without consent unless the law and our policies allow us to do so.</p> <p>Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about students with:</p> <ul style="list-style-type: none"> • Our Local Authority – <i>to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions</i> • The Department for Education – <i>to provide data as requested for the National Pupil Database [NPD]</i> • The Learning Records Service – <i>to provide us with a Student Unique Learner Number (ULN)</i> • The student's family and representatives – <i>to support student welfare</i> • Educators and examining bodies – <i>to register and process results of examinations</i> 	<p>We do not share personal information about you with anyone outside the school without permission from you or your parents or carers, unless the law and our policies allow us to do so.</p> <p>Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you with:</p> <ul style="list-style-type: none"> • Our Local Authority – <i>to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions</i> • The Department for Education – <i>to provide data as requested for the National Pupil Database [NPD]</i> • The Learning Records Service – <i>to provide us with your Unique Learner Number (ULN)</i> • The student's family and representatives – <i>to support student welfare</i>

<ul style="list-style-type: none"> • Our regulator, Ofsted • Suppliers and service providers –including online learning platforms and payment systems used in school. • Central and local government – <i>to provide data as requested</i> • Health authorities – <i>to support student welfare</i> • Health and social welfare organisations – <i>to support student welfare</i> • Charities and voluntary organisations – <i>Parent Teacher Association to promote and raise funds for the school</i> • Police forces, courts, tribunals – <i>to provide data as requested with a warrant</i> • Professional bodies – <i>to provide data necessary for trips, visits and work experience (work experience – secondary only).</i> 	<ul style="list-style-type: none"> • Educators and examining bodies – <i>to register and process results of examinations</i> • Our regulator, Ofsted • Suppliers and service providers –including online learning platforms and payment systems used in school. • Central and local government – <i>to provide data as requested</i> • Health authorities – <i>to support student welfare</i> • Health and social welfare organisations – <i>to support student welfare</i> • Charities and voluntary organisations – <i>Parent Teacher Association to promote and raise funds for the school</i> • Police forces, courts, tribunals - <i>to provide data as requested with a warrant</i> • Professional bodies – <i>to provide data necessary for trips, visits and work experience (work experience – secondary only).</i>
NATIONAL DATABASE	
<p>We are required to provide information about students to the Department for Education as part of statutory data collections such as the school census.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>For more information, see the Department’s webpage on <u>how it collects and shares research data</u>.</p>	<p>We are required to provide information about you to the Department for Education (a government department) as part of data collections such as the school census.</p> <p>Some of this information is then stored in the National Pupil Database, which is managed by the Department for Education and provides evidence on how schools are performing. This, in turn, supports research.</p> <p>The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, Local Authorities, exam boards and others.</p> <p>The Department for Education may share information from the database with other organisations which promote children’s education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data.</p> <p>You can find more information about this on the Department for Education’s webpage on <u>how it collects and shares research data</u>.</p> <p>You can also contact the Department for Education if you have any questions about the database.</p>

<p>You can also contact the Department for Education with any further questions about the NPD.</p>	
YOUTH SUPPORT SERVICES	
<p>Once our students reach the age of 13, we are legally required to pass on certain information about them to Bracknell Forest Borough Council as it has legal responsibilities regarding the education or training of 13–19-year-olds.</p> <p>This information enables them to provide youth support services, post-16 education and training services, and careers advisers.</p> <p>Parents or carers, or students once aged 16 or over, can contact our data protection officer to request that we only pass the individual's name, address and date of birth to Bracknell Forest Borough Council.</p>	<p>Once you reach the age of 13, we are legally required to pass on certain information about you to Bracknell Forest Borough Council as it has legal responsibilities regarding the education or training of 13–19-year-olds.</p> <p>This information enables them to provide youth support services, post-16 education and training services, and careers advisers.</p> <p>Your parents or carers, or you once you're 16, can contact our data protection officer to ask us to only pass your name, address and date of birth to Bracknell Forest Borough Council.</p> <p>For younger pupils, these rights are typically exercised by a parent or carer until the child is considered mature enough to understand and manage their own data rights (usually age 12 or above).</p>
TRANSFERRING DATA INTERNATIONALLY	
<p>Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.</p>	<p>Where we share data with an organisation that is based outside the European Economic Area, we will protect your data by following data protection law.</p>
PARENTS' OR CARERS' RIGHTS REGARDING PERSONAL DATA	YOUR RIGHTS REGARDING PERSONAL DATA
<p>Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them.</p> <p>Parents or carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.</p> <p>Parents also have the right to make a subject access request with respect to any personal data the school holds about them.</p> <p>If you make a subject access request, and if we do hold information about</p>	<p>How to access personal information we hold about you</p> <p>You can find out if we hold any personal information about you, and how we use it, by making a 'subject access request', as long as we judge that you can properly understand your rights and what they mean.</p> <p>If we do hold information about you, we will:</p> <ul style="list-style-type: none"> • Give you a description of it • Tell you why we are holding and using it, and how long we will keep it for

<p>you or your child, we will:</p> <ul style="list-style-type: none"> • Give you a description of it • Tell you why we are holding and processing it, and how long we will keep it for • Explain where we got it from, if not from you or your child • Tell you who it has been, or will be, shared with • Let you know whether any automated decision-making is being applied to the data, and any consequences of this • Give you a copy of the information in an intelligible form. <p>Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.</p> <p>In most cases, particularly in primary schools or where a child is under the age of 12, parents or carers will act on behalf of their child when it comes to data rights and requests.</p> <p>If you would like to make a request, please contact our data protection officer.</p>	<ul style="list-style-type: none"> • 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. <p>You may also ask us to send your personal information to another organisation electronically in certain circumstances.</p> <p>If you want to make a request, please contact our data protection officer.</p> <p><i>If you're in primary school, or under the age of 12, your parent or carer will usually look after your data rights for you. As you get older, you'll be able to take more control of this yourself.</i></p>
PARENTS' OR CARERS' OTHER RIGHTS OVER DATA	YOUR OTHER RIGHTS OVER YOUR DATA
<p>Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:</p> <ul style="list-style-type: none"> • Object to the use of personal data if it would cause, or is causing, damage or distress • Prevent it being used to send direct marketing • Object to decisions being taken by automated means (by a computer or machine, rather than by a person) • In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing • Seek redress for damages caused by a breach of the data protection regulations. • To exercise any of these rights, please contact our data protection officer. 	<p>You have other rights over how your personal data is used and kept safe, including the right to:</p> <ul style="list-style-type: none"> • Say that you don't want it to be used if this would cause, or is causing, harm or distress • Stop it being used to send you marketing materials • Say that you don't want it used to make automated decisions (decisions made by a computer or machine, rather than by a person) • Have it corrected, deleted or destroyed if it is wrong, or restrict our use of it • Seek redress if the data protection rules are broken and this harms you in some way.

COMPLAINTS

We take any complaints about 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 concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

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

You can make a complaint at any time by contacting our data protection Officer. You can also complain to the Information Commissioner's Office in one of the following ways:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

CONTACT US

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact [Insert School Contact Name and Position].

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