Privacy Policy - Parents

PARENTS

CONCORDIA MULTI ACADEMY TRUST

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1. Document Control

Amendment History

Version No.	Date	Comments
0.1	December 2024	Published
1.1	Aug 2025	Change to DPO
1.2	October 2025	Amended ownership of document and minor updates to wording

Review Dates

Next Review Date
October 2027

Author(s)

Name	Role
Matt Larkin	Chief Financial Officer and Data Protection Officer

Reviewer(s)

Name	Role
Simon Faircloth	Chief Operating Officer

Approver(s)

Name	Role
Simon Faircloth	Chief Operating Officer

2. Introduction

Our Trust collects a lot of data and information about our pupils so that we can run effectively. This privacy notice explains how and why we collect parent data, what we do with it and what rights parents have.

Concordia Multi Academy Trust is the Data Controller for all the academies within the Trust.

The Data Protection Officer is Matt Larkin and is contactable via cfo@concordiamat.co.uk

The term "parent" is widely defined in education law to include the natural or adoptive parents (regardless of whether parents are or were married, whether a father is named on a birth certificate or has parental responsibility for the pupil, with whom the pupil lives or whether the pupil has contact with that parent), and also includes non-parents who have parental responsibility for the pupil, or with whom the pupil lives. For example, carers.

It is therefore possible for a pupil to have several "parents" for the purposes of education law. This privacy notice also covers other members of pupils' families who we may process data about from time to time, including, for example, siblings, aunts and uncles and grandparents.

3. Principles

Why do we collect and use parent / carer information?

We will comply with UK data protection law. This means that the personal information we hold about parents and carers must be used lawfully, fairly and transparently; collected only for specified, explicit and legitimate purposes; adequate, relevant and limited to what is necessary; accurate and kept up to date; kept only for as long as necessary; and processed securely.

We collect and use parents and carers information only where the law allows us to do so. Depending on the particular purpose, processing will normally be necessary to comply with a legal obligation, to perform a task in the public interest or exercise official authority vested in the Trust, or to protect someone's vital interests. In limited circumstances, we may rely on consent where no other lawful basis applies.

Where the personal data we collect about parents and carers is special category data, we will only process it where an Article 6 lawful basis applies and an additional condition under Article 9 of the UK GDPR is met. Depending on the circumstances, this may include explicit consent, the protection of someone's vital interests where the individual is physically or legally incapable of giving consent, substantial public interest under applicable law, health or social care purposes, or the establishment, exercise or defence of legal claims. Please see our Data Protection Policy for further information about special category data and the safeguards that apply when we process it.

We use the parent / carer data to support our functions of running Trust and its schools, in particular:

- to decide who to admit to the school
- to maintain a waiting list
- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing
- for the protection and welfare of pupils and others in the school, including our safeguarding / child protection obligations
- for the safe and orderly running of the school
- to promote the school
- to send you communications that may be of interest to you which may include information about school events or activities, news, campaigns, appeals, other fundraising activities
- in order to respond to investigations from our regulators or to respond to complaints raised by our stakeholders
- Bank details to process payments
- in connection with any legal proceedings threatened or commenced against the school.

The categories of parent / carer information that we collect, hold and share include:

a. Personal information (such as name, address, telephone number and email address);

b. Information relating to your identity, marital status, employment status, religion, ethnicity, language, medical conditions, nationality, country of birth and free school meal / pupil premium

eligibility / entitlement to certain benefits, information about court orders in place affecting parenting arrangements for pupils);

From time to time and in certain circumstances, we might also process personal data about parents / carers, some of which might be sensitive personal data, information about criminal proceedings / convictions or information about child protection / safeguarding.

This information is not routinely collected about parents / carers and is only likely to be processed by the school in specific circumstances relating to particular pupils, for example, if a child protection issue arises or if a parent / carer 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 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.

We collect information about parents / carers before pupils join the school and update it during pupils' time on the roll as and when new information is acquired.

There are "special categories" of more sensitive personal data which require a higher level of protection. The UK GDPR defines special category data as:

- personal data revealing racial or ethnic origin
- personal data revealing political opinions
- personal data revealing religious or philosophical beliefs
- personal data revealing trade union membership
- genetic data
- biometric data (where used for identification purposes)
- data concerning health
- data concerning a person's sex life
- data concerning a person's sexual orientation.

Collecting parent / carer information

Whilst the majority of information about parents / carers provided to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain parent / carer information to us or if you have a choice in this. Where appropriate, we will ask parents / carers for consent to process personal data where there is no other lawful basis for processing it, for example where we wish to ask your permission to use your information for marketing purposes or to request voluntary contributions. Parents / carers may withdraw consent given in these circumstances at any time.

In addition, the Trust also uses CCTV cameras around the school sites for security purposes and for the protection of staff and pupils. CCTV footage may be referred to during the course of disciplinary procedures (for staff or pupils) or to investigate other issues. CCTV footage involving parents / carers will only be processed to the extent that it is lawful to do so. Please see our CCTV policy for more details.

Storing parent / carer data

A significant amount of personal data is stored electronically in the Trust's management information, communication and other authorised systems. Some information may also be stored in hard copy format.

We have put in place appropriate technical and organisational measures to protect pupils' personal information against accidental loss, unauthorised access, alteration or disclosure. Access is limited to staff, contractors and other third parties who need the information for a legitimate purpose and who are required to handle it securely.

Some of our service providers may store or process personal information outside the United Kingdom. We may also need to transfer personal information internationally, for example when arranging an overseas school trip. Where personal information is transferred outside the United Kingdom, we will ensure that an appropriate lawful transfer mechanism and suitable safeguards are in place.

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

Details of retention periods for different aspects of your personal information are available in our Data Retention Policy.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a parent / carer of a child at the school we will retain and securely destroy your personal information in accordance with our data retention policy OR applicable laws and regulations.

Who do we share parent / carer information with?

We routinely share parent / carer information with:

- schools that pupils attend after leaving us.

From time to time, we may also share parent / carer information other third parties including the following:

- our local authority
- a pupil's home local authority (if different)
- the Department for Education (DfE)
- school local governors / trustees
- the central team
- 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
- other schools, for example, if we are negotiating a managed move and we have your consent to share information in these circumstances
- our legal advisors
- our insurance providers
- our system providers

Some organisations with which we share information will be independent data controllers responsible for their own use of the information. In some circumstances, the Trust and another organisation may jointly determine the purposes and means of processing and will therefore be joint controllers. Where this applies, the respective responsibilities of the controllers will be set out appropriately.

In the event that we share personal data about parents / carers 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.

Requesting access to your personal data

Under data protection legislation, parents / carers have the right to request access to information about you that we hold ("Subject Access Request").

To make a request for your personal data, please contact the Data Protection officer.

Any written request for personal data will be treated as a Subject Access Request.

The legal timescales for the Trust to respond to a Subject Access Request is one calendar month. As the School has limited staff resources outside of term time, we encourage parents / carers to submit Subject Access Requests during term time and to avoid sending a request during periods when the school is closed or is about to close for the holidays where possible. This will assist us in responding to your request as promptly as possible.

For further information about how we handle Subject Access Requests, please see our Data Protection Policy.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

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; and
- claim compensation for damages caused by a breach of our data protection responsibilities.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Headteacher. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data protection officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you would like to discuss anything in this privacy notice, please contact the Data Protection Officer.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

You can contact the Information Commissioners Office on 0303 123 1113 or via email as described on https://ico.org.uk/global/contact-us/email/ or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.