



Privacy Notice for Parents and Pupils

How we use your information

2025/26

Who are we?

Prime7 Multi Academy Trust is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Prime7 Multi Academy Trust is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: **ZA106864**

You can contact the school as the Data Controller in writing at:

Prime7 Multi Academy Trust, Middleton Cheney Primary Academy, Main Road, Middleton Cheney, Banbury, Oxon, OX17 2PD. Tel No. 01295 710218 email: admin@prime7.org.uk

What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our pupils and parents.

What is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information relates to personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

What personal information do we process about pupils and parents? The pupil and parent information that we collect, hold and share includes:

- Personal information including a pupil's name, date of birth, unique pupil number and home address
- Characteristics such as language and free school meal eligibility.
- Attendance information such as sessions attended, number of absences and absence reasons.

- Educational information including records of work, assessment results, relevant medical information, details of pupils' special educational needs, exclusions/behavioural information, post-16 learning information.
- Contact information for parents, carers and other relatives, including telephone numbers, home addresses and e-mail addresses.
- Information about a child's home life, where required as part of necessary safeguarding and welfare processes.

Why do we use personal information?

We use pupil data:

- 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
- to safeguard pupils
- to keep the school community safe and well

Collecting pupil information

Whilst the majority of pupil information you provide 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 pupil information to us or if you have a choice in this.

What are the legal reasons for us to process your personal information?

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. The lawful reasons we have for processing personal information are as follows:

1) To comply with the law

We collect and use general purpose pupil information in order to meet certain legal requirements and legal obligations placed upon the school by law. We therefore are required to process personal information for such purposes even if you have not consented to us doing so.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

If you would like a copy of or further information regarding the statutory authorities that underpin our legal obligations, you should contact the school in writing.

2) To protect someone's vital interests

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

3) With the consent of the individual to whom that information 'belongs'

Whilst much of the personal information processed is in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

4) To perform a public task

It is a day-to-day function of the school to ensure that children receive the education and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that pupils are properly educated and supported

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

In certain circumstances, an individual has the right to object to any processing where it is likely to cause or is causing harm or distress. To exercise this right, individuals should do so by contacting Prime7 MAT to inform them of their reasons for the objection. These reasons should relate to your specific circumstances. Upon receipt of an objection, Prime7 MAT will consider the reasons for the objection and balance this against the legitimate grounds to process data.

5) We have a legitimate interest

Occasionally we have reasons to process information which fall outside of our usual day-to-day school functions. Details of the type of processing that we may undertake on this basis are set out in Table 5.

In certain circumstances an individual has the right to object to any processing where it is likely to cause or is causing harm or distress. To exercise this right, individuals should do so by contacting Prime7 MAT to inform them of their reasons for the objection. These reasons should relate to your specific circumstances. Upon receipt of an objection, Prime7 MAT will consider the reasons for the objection and balance this against the legitimate grounds to process data.

Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

- 1) Explicit consent of the data subject
- 2) Processing relates to personal data which is manifestly made public by the data subject
- 3) Necessary for establishing, exercising or defending legal claims
- 4) Necessary for reasons of substantial public interest
- 5) Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
- 6) Necessary for archiving, historical research or statistical purposes in the public interest

The lawful reasons for each type of special category personal information data that we process is set out in the tables attached.

Who might we share your information with?

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- School nurse
- NHS
- Public Health and other public health agencies
- Information Management software: Arbor/Wonde
- Educational apps: MyMaths, Purple Mash, Mathletics, Hamilton Trust,
- Conferencing software for homework and home learning: Microsoft Teams, Zoom

We do not share information about our pupils or parents unless the law and our policies allow us to do so.

Data collection requirements:

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to

<https://www.gov.uk/education/datacollectionand-censuses-for-schools>.

What do we do with your information?

All personal information is held in a manner which is compliant with data protection legislation.

Personal information is only processed for the purpose it was collected. The school monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

How long do we keep your information for?

In retaining personal information, the school complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the school are required to retain the information. For further information please see the Trust Document Management Policy.

Transferring data internationally

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.

What are your rights with respect of your personal information?

Under data protection law, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or to have access to your child's educational record, contact the School Data Protection Officer at Warwickshire Legal Services via email at schooldpo@warwickshire.gov.uk or alternatively;

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick

****Please ensure you specify which school your request relates to.**

In certain circumstances where Prime7 MAT processes data for the purposes of legitimate interests or to fulfil their public task, individuals have a right to object to the processing where it is likely to cause, or is causing, harm or distress. When exercising this right, individuals should contact the school/academy trust to inform them of their reasons for their objection. The school/academy trust will consider the reasons for any objection and assess the risk to the individual against the purposes for the processing. In the event Prime7 MAT is unable to comply with an objection, we will ensure we can demonstrate compelling legitimate grounds to continue with the processing.

Where Prime7 processes your information with your consent, you have the right to withdraw your consent at anytime. To exercise this right, please contact Prime7 at admin@prime7.org.uk

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 the Data Protection regulations
- Subject to the complaints procedure below, you have the right to complain to the ICO

Data Protection Complaints

We are committed to handling your personal data in a way that is fair, transparent, and in accordance with the law. If you are unhappy with how we have handled your data, this process outlines how you can make a complaint.

How to Make a Complaint

If you have a concern about how your personal data has been handled, please contact our Data Protection Lead (DPL).. This gives us the opportunity to investigate and resolve the matter as quickly as possible.

There is no set format for making a data protection complaint. However, submitting your complaint in writing may help us to respond more promptly. Please direct your complaint to:

Prime7 MAT (DPL) email: bursar@prime7.org.uk

What to Expect from Us

We will acknowledge receipt of your complaint within 30 days. We will, without undue delay, take appropriate steps to respond to your complaint, including making appropriate enquires.

Throughout the process, we will:

Keep you informed of our progress.

Request any additional information we may need from you in a timely and proportionate manner.

Provide you with a clear and comprehensive outcome of our investigation.

If You Remain Unhappy

If you are not satisfied with the outcome of your complaint, or if you feel we have not handled it appropriately, you have the right to complain to the Information Commissioner's Office (ICO). The ICO is the UK's independent regulator for data protection and information rights.

For more information about the ICO and their complaints process, you can visit their website at ico.org.uk.

Review

The content of this Privacy Notice will be reviewed annually every September.

Table 1 – Personal information we are required to process to comply with the law:

Information Type	Relevant legislation	Special Category– additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Name	Education regulation 2006		Arbor/DfE/LA/MASH/School Grid	Legal obligation
Date of birth	Education regulation 2006		Arbor/DfE/LA/MASH/School Grid	Legal obligation
Gender	Education regulation 2006		Arbor/DfE/LA/MASH/School Grid	Legal obligation
Address	Education regulation 2006		Arbor/DfE/LA/MASH/School Grid	Legal obligation
Telephones	Education regulation 2006		Arbor/DfE/LA/MASH/School Grid	Legal obligation
Family links	Children’s Act 2004		MASH	Legal obligation
Ethnicity	Education regulation 2013	Explicit consent given by data subject	Arbor/DfE/LA/MASH	Legal obligation
SEN / Disability	Children’s Act 2004 Education regulations 2013	Explicit consent given by data subject	Arbor/DfE/LA/MASH	Legal obligation
Safeguarding	Education regulation 2013		Arbor/ LA/MASH	Legal obligation
Previous school	Education regulation 2013		Arbor/ Staff/ DfE/ LA	Legal obligation
Assessment	Education regulation 2013		Arbor/ Staff/ DfE / LA	Legal obligation
Attendance	Education regulation 2013		Arbor / DfE / LA /MASH	Legal obligation
FSM eligibility	Education regulation 2013		Arbor/ DfE/ LA /School Grid	Legal obligation
UPN number	Education regulation 2013		Arbor/ DfE/ LA / MASH	Legal obligation
Year group	Education regulation 2013		Arbor/ DfE/ LA / MASH	Legal obligation
Admissions information	Education regulation 2013		Arbor/ LA /	Legal obligation

EAL	Education regulation 2013		Arbor/ DfE/ LA /MASH	Legal obligation
LAC information	Education regulation 2013		Arbor/DfE / LA	Legal obligation
Service child	Education regulation 2013		Arbor / DfE / LA	Legal obligation
Court order	Children's Act 2004		MASH	Legal obligation

Table 2 – Personal information we are required to process as it is necessary to protect someone's vital interests.

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Medical / Health information	Necessary to protect data subject	Arbor / NHS/ LA / Staff	Vital interest
Dietary information	Necessary to protect data subject	Arbor / NHS / LA / Staff	Vital interest

Table 3 - Personal information we are required to process with the consent of the individual to whom that information 'belongs'

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Religion	Explicit consent has been given by data subject	Arbor/ LA	Consent
Image consent	Explicit consent has been given by data subject	Arbor / Staff/ Photography company / Local press / Website	Consent
Collection consent	Explicit consent has been given by data subject	School staff	Consent

Table 4 – Personal information we are required to process because it is necessary to do so in order to perform a public task - please note that the right to object will apply to this processing, please see the section above that refers to “What are your rights with respect of your personal information”

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Name		MASH/LA/NHS/ Public Health Agencies School staff / School Grid /Online learning platforms i.e Teams/Outlook/Zoom /Tapestry/IMS/NMPAT/PurpleMash/My Maths/Mathletics/Numbots/NFER/Neli/ Cool Milk/BugClub/Oxford Reading Buddy/Lexia/No More Marking/Charanga/Class DoJo/CPOMS/Seesaw/Edukey/Imagative Minds	Public Task
Date of birth		MASH/LA/NHS/ Public Health Agencies School staff/ School Grid/Online learning platforms i.e Teams/Outlook/Zoom Public Health and other public health agencies/Tapestry/FFT Aspire/NFER/Neli/No More Marking/CPOMS/Seesaw/Edukey	Public Task
Gender		MASH/LA/NHS/ School staff/School Grid/ Tapestry/FFT Aspire/NFER/Neli/No More Marking/CPOMS/Seesaw/Edukey	Public Task
Emergency contact Details/Parent Contact Number		MASH/LA/NHS/ Public Health Agencies School staff/School Grid Public Health and other public health agencies/Tapestry/Cool Milk/Seesaw/Dolce	Public Task
Results of COVID-19 testing	Necessary for reasons of public health	Public Health and other public health agencies	Public Task
Year Group details		MASH/LA/NHS/ School staff School Grid/Online learning platforms i.e Teams/Outlook/Zoom Public Health and other public health agencies/Tapestry/IMS/NMPAT/Purple Mash/MyMaths/Mathletics/Numbots/NFER/ Cool Milk/Bug Club/Oxford Reading Buddy/Lexia/No More Marking/Class DoJo/CPOMS/Edukey	Public Task

SEND information	Data subject has given explicit consent	MASH/LA/NHS/School staff / CPOMS/Edukey	Public Task
FSM eligibility		Arbor/LA/School Grid/Edukey	Public Task
Dietary Info		NHS /School Grid/ School staff/Edukey	Public Task
Medical Info	Data subject has given explicit consent	NHS /School Grid/ School staff / MASH /CPOMS/Edukey	Public Task
GP practice		Arbor/NHS	Public Task
Attendance		Arbor/Edukey/CPOMS	Public Task
Mode of transport		Arbor	Public Task
LAC Status		SENCO / Other school staff	Public Task

Table 5 – Personal information we process because we have a legitimate interest

Information Type	Special Category – additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Images captured on our CCTV system	n/a	This is not shared routinely	n/a