



Privacy Notice

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Mulberry Schools Trust: Privacy Notice (How We Use Pupil Information)

Who We Are

The Mulberry Schools Trust is the 'Data Controller' for your information. This means we are responsible for deciding how your personal data is collected and used.

We are providing this notice to explain what we do with your data. We are required to do this by data protection law.

Our Data Protection Officer (DPO) is Satswana Ltd. If you have any questions about how we handle your data, you can contact them at:

Email: info@satswana.com

Telephone: 01252 516898

Address: Pembroke House, St Christopher's Place, Farnborough, Hampshire, GU14 0NH

The Pupil Friendly Privacy Notice (The "Quick Read")

We are Mulberry Schools Trust, and we need to keep some information about you. This is called your 'personal data'. This page explains what we do with it.

What information do you have about me?

We keep information like:

- Your name, address, and birthday.
- Your parents' or carers' contact details.
- Your attendance (so we know you're in school).
- Your exam results and school reports (to see how you're doing).

Information about your health (like allergies) or extra needs (like Special Educational Needs) to make sure we keep you safe and help you learn.

Why do you need this information?

We use your information to do our jobs, like:

- Teaching you and helping you learn.
- Keeping you safe (this is called safeguarding).
- Running the school (like knowing what you're having for lunch or which books you've taken from the library).
- Checking your progress to make sure you're doing well.

Do I have a choice?

- We must collect most of your information by law (the Education Act). This helps us run the school properly.
- Sometimes we ask for your permission (consent). For example, we use your fingerprint to let you pay for lunch or use the library. You can say no to this, and we will give you a different way (like a card) to use instead.

Who do you share my information with?

We keep your data safe and only share it when we absolutely have to (like when it's required by law, or when we need help to teach you). We have to share some of your data with other people, like:

- The Department for Education (DfE) and your Local Authority. This is a legal rule so they can check how all schools are doing.

- Your next school when you leave us.
- People who help us run the school (like our lunch or IT providers).
- The NHS (like the school nurse).
- We never sell your data to anyone.

What are my rights?

You have rights over your data. You can:

- Ask to see a copy of the information we have about you.
- Ask us to fix anything that is wrong.
- Ask us to delete your information (but we can only do this if the law allows it).
- If you are worried about any of this, please talk to a trusted adult (like your teacher or parent). They can help you talk to us or our DPO.

The Detailed Privacy Notice (For Parents, Carers, and Guardians)

This notice provides the full details of how we, Mulberry Schools Trust, process personal data for our pupils.

The Categories of Personal Data We Hold

We process data relating to our pupils. This includes:

- Personal Identifiers: Name, unique pupil number (UPN), address, date of birth, and contact details for parents and carers.
- Characteristics (Special Category Data): Ethnicity, language, nationality, country of birth, and religious beliefs.
- Health (Special Category Data): Relevant medical information, allergies, health conditions, and information from school nurses.
- SEN (Special Category Data): Information on special educational needs and disabilities.
- Welfare Data: Free school meal eligibility, safeguarding information, and details of any child protection plans.
- Academic Data: Attendance, behavioural information (positive records, exclusions, detentions), assessment information, and exam results.
- Biometric Data (Special Category Data): We use an automated biometric fingerprint recognition system. This system takes digital measurements of the fingerprint; it does not store a complete fingerprint image, so the original cannot be recreated from the data.

Why We Use This Data (Purposes and Lawful Basis)

We use this data to run the school and support our pupils' learning, progress, and welfare. We process data under the following legal bases:

- a) Core Processing (Public Task)
 - Most of our processing is necessary for us to perform our official functions as a school.
 - Lawful Basis: Article 6(1)(e) - Public Task.
 - Special Category Condition: Article 9(2)(g) - Substantial Public Interest (and DPA 2018, Schedule 1, Part 2, for statutory purposes).

This applies when we:

- Support pupil learning and monitor progress.
- Provide appropriate pastoral care and support.
- Protect pupil welfare and ensure safeguarding.
- Monitor attendance and behaviour.
- Comply with statutory reporting (see Section 3).

b) Biometric Data (Explicit Consent)

- Our use of the biometric system for the canteen and library is not part of our public task and requires your permission.
- Lawful Basis: Article 6(1)(a) - Consent.
- Special Category Condition: Article 9(2)(a) - Explicit Consent.
- We comply with the Protection of Freedoms Act 2012. We will seek explicit written consent from one parent/carer before we first process your child's biometric data.
- Right to Opt-Out: You and/or your child have the right to refuse or withdraw consent at any time. The school will provide an alternative (e.g., a card or PIN) to access these services.

Data Sharing (Who We Share Data With)

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

(a) Routine Sharing

We routinely share information with:

- Schools that pupils attend after leaving us.
- Our Local Authority (LA).
- The National Health Service (NHS), e.g., school nurses and immunisation teams.
- Examination boards.
- Our suppliers (e.g., catering, IT support, online learning platforms). We have contracts (Data Processing Agreements) in place to ensure they protect the data.

(b) Statutory Sharing (Department for Education)

- We are required by law to share information about our pupils with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational policy.
- We are required to provide information to the DfE as part of statutory data collections such as the School Census.

c) The National Pupil Database (NPD)

- The DfE stores some of the data we share in the National Pupil Database (NPD). The NPD is managed by the DfE and contains information about pupils in schools in England. It provides evidence on educational performance to inform independent research, which is commissioned by the DfE.
- The DfE has robust processes in place to ensure data confidentiality is maintained. To find out more about the NPD, please visit:

<https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

d) Youth Support Services (Pupils Aged 13+)

- Once pupils reach the age of 13, we are legally required (Section 507B of the Education Act 1996) to pass certain information to our Local Authority and/or their

provider of youth support services. This enables them to provide services like careers advice.

- A parent/carer can request that only their child's name, address, and date of birth be passed to the youth support provider. Please contact the school office to make this request. This right transfers to the pupil once they reach age 16.

Data Storage and Retention

- We hold pupil data in line with the Trust's Record Retention Schedule, which is based on the Information and Records Management Society (IRMS) toolkit for schools. Pupil files are generally kept until the pupil reaches the age of 25, though some information (e.g., safeguarding records) may be kept longer.

Your Data Protection Rights

- You and your child have several rights under data protection law.
- To request a copy of the information we hold about you/your child.
- To ask us to correct any data that is inaccurate.
- To ask us to delete your data (this is not an absolute right and only applies in certain circumstances, e.g., where we process by consent).
- To object to our processing of data where our lawful basis is Public Task. We must then stop unless we can demonstrate compelling legal grounds to continue.
- A child's personal data belongs to them. For a parent to make a request on behalf of their child, the child must either be unable to understand their rights, or have given their consent. We will judge this on a case-by-case basis, but we generally consider that pupils aged 12 and above have the maturity to understand and exercise their own data rights.
- To make a request, please contact the school office or our DPO. We will respond to all requests within one calendar month.

Concerns and Complaints

If you have any concerns about how we are using your data, please follow this procedure:

1. Please first contact the Headteacher of your child's school or the Mulberry Schools Trust Central Office. This allows us to investigate your concern and resolve any issues quickly.
2. If you are not satisfied with the response from the school or the Trust, you may contact our Data Protection Officer (DPO), Satswana Ltd, for independent advice and assistance.
3. If you remain unsatisfied, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).