

# **PRIVACY NOTICE (TIER 4)**

## **SECONDARY, SIXTH FORM STUDENTS AND THEIR FAMILIES**

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### **1. Scope**

This privacy notice covers all data subjects (students and their families) whose personal data is collected in the provision of secondary and sixth form education at Vision Academy Learning Trust schools, in line with the requirements of the General Data Protection Regulation (GDPR).

### **2. Responsibilities**

- 2.1** The Data Protection Officer / Trust Compliance Manager is responsible for ensuring that this notice is made available to data subjects prior to Vision Academy Learning Trust collecting/processing their personal data.
- 2.2** All Employees/Staff of Vision Academy Learning Trust who interact with data subjects are responsible for ensuring that this notice is drawn to the data subject's attention and their consent to the processing of their data is secured.

### **3. Privacy notice**

The Vision Academy Learning Trust is a group of secondary and primary schools with a common aim to inspire the imaginations of our students and to support them to develop in ways which stand them in good stead for their future lives and responsibilities as individuals, employees and citizens.

- Vision Academy Learning Trust is a company limited by guarantee registered in England.
- Company Number: 10249712
- Registered Office: Egglecliffe School, Urray Nook Road, Egglecliffe, Stockton-on-Tees, TS16 0LA
- ICO Registration Number ZA194005

Our Data Protection Officer can be contacted directly here:

- [dpo@valt.org.uk](mailto:dpo@valt.org.uk)
- 01642 051020

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**The personal data we would like to collect from/process about Vision secondary and sixth form students and their families is:**

<b>Data Ref</b>	<b>Personal data type:</b>	<b>Source</b> (where Vision Academy Learning Trust obtained the personal data from if it has not been collected directly from you, the data subject.):
1	Student personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, unique candidate identifier (UCI), unique learner number (ULN)/ Student school email address, care arrangements, court orders	
2	Student ethnicity, language	
3	Student Free school meal eligibility	Stockton Borough Council/ Redcar & Cleveland Borough Council Confidential Free School Meals Helpline
4	Parent names, contact telephone numbers, email addresses, addresses, relationship to pupil	
5	Attendance information – number of absences, sessions late, absence reasons	
6	Assessment information – qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades, external examination results, teacher assessment results, examination scripts	Teaching Staff, Examination Boards (eAQA, OCR, Pearson EdExcel, WJEC, PetXi, Cache, JCQ, CIE, NCFE, OFQUAL)
7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans	Teaching Staff
8	Behavioural information – e.g. number of temporary exclusions	Head Teacher
9	Student medical information – individual healthcare plans, medication, allergies	
10	Post 16 destinations (education, employment, training) and destinations of those students who leave before the normal leaving age, or mid-year	Teaching Staff
11.0	Photographs and video images (forming part of student assessment record)	Teaching Staff
11.1	Photographs of individual students (taken by Vision Employee kept on pupil record and for ID Badges)	Edukey
11.2	Photographs of individual students (taken by third party for sale to parents)	Tempest Photography
11.3	Photographs of groups of students (taken by third party for sale to parents)	Tempest Photography
11.4	First name, surname, photographs and video images shared on Trust websites and social media	Teaching Staff

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11.4a	First name, surname, photographs and video images (used in displays, school publications and printed garments such as hoodies and t-shirts)	Teaching Staff
11.4b	Photographs and video images of individual students and groups of students shared on Trust websites and social media	Simon Hogben Photography
11.5	First name, photographs and video images (in local or national newspapers, televised news programmes or on media website)	
11.6	Eye Movement recordings, Audio Recordings, Test Results	Lexplore
12	Biometric (fingerprint) data	
13	CCTV video surveillance	
14	Telephone Calls	

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**The personal data we collect will be used for the following purposes:**

Data Ref	Personal data type:	Purpose of processing
1	Student personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, unique candidate identifier (UCI), unique learner number (ULN), care arrangements, court orders	To support student learning To monitor and report on student progress To provide appropriate pastoral care To safeguard the individuals on our premises To assess the quality of our service To maintain school information required by law
2	Student ethnicity, language	
3	Student free school meal eligibility	To monitor and report on student progress To provide appropriate pastoral care To maintain school information required by law
4	Parent names, contact telephone numbers, email addresses, addresses, relationship to pupil	To provide appropriate pastoral care To safeguard the individuals on our premises To communicate with parents
5	Attendance information – e.g. number of absences and absence reasons	To monitor and report on student progress To provide appropriate pastoral care To safeguard the individuals on our premises To maintain school information required by law
6	Assessment information – qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades, external examination results, teacher assessment results, examination scripts	To monitor and report on student progress To assess the quality of our service To provide appropriate pastoral care To maintain school information required by law
7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans	To monitor and report on student progress To provide appropriate pastoral care To safeguard the individuals on our premises To maintain school information required by law
8	Behavioural information – e.g. number of temporary exclusions	To support student learning To monitor and report on student progress To assess the quality of our service To provide appropriate pastoral care To safeguard the individuals on our premises To maintain school information required by law
9	Student medical information – individual healthcare plans, medication, allergies	To provide appropriate pastoral care To safeguard the individuals on our premises
10	Post 16 destinations (education, employment, training) and destinations of those students who leave before the normal leaving age, or mid-year	To assess the quality of our service To maintain school information required by law
11.0	Photographs and video images (forming part of pupil assessment record)	To monitor and report on student progress
11.1	Photographs of individual students (taken by Vision Employee kept on pupil record and for ID Badges)	To provide appropriate pastoral care To safeguard the individuals on our premises

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11.4	First name, surname, photographs and video images shared on Trust websites and social media	To communicate with students, parents and the wider community
11.4a	First name, surname, photographs and video images (used in displays, school publications and printed garments such as hoodies and t-shirts)	
11.4b	Photographs and video images of individual students and groups of students shared on Trust websites and social media	
11.5	First name, photographs and video images (in local or national newspapers, televised news programmes or on media website)	
12	Biometric (fingerprint) data	To provide meal service for students
13	CCTV video surveillance	To safeguard the individuals on our premises
14	Phone Call recording	To Safeguard Staff and callers

**Our legal basis for processing for the personal data is as follows:**

Note: "Article" refers to the section of the General Data Protection Regulation under which lawful processing is permitted.

Data Ref	Personal data type:	Legal Basis
1	Student personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, unique candidate identifier (UCI), unique learner number (ULN), care arrangements, court orders	<ul style="list-style-type: none"> <li><b>Article 6(1)(e) – official authority</b> processing is necessary in the exercise of official authority vested in the controller (Education Act 1996)</li> <li><b>Article 6(1)(c) - legal obligation</b> Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013</li> </ul>
2	Student ethnicity, language	
3	Student free school meal eligibility	
4	Parent names, contact telephone numbers, email addresses, addresses, relationship to pupil	
5	Attendance information – e.g. number of absences and absence reasons	
6	Assessment information – qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades, external examination results, teacher assessment results, examination scripts	
7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans	
8	Behavioural information – e.g. number of temporary exclusions	

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9	Student medical information – individual healthcare plans, medication, allergies	
11.0	Photographs and video images (forming part of student assessment record)	
7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans	<ul style="list-style-type: none"> <li>• <b>Article 6(1)(c) – legal obligation:</b> Section 100 Children and Families Act 2014</li> <li>• <b>Article 6(1)(d) – vital interest</b></li> </ul>
9	Student medical information – individual healthcare plans, medication, allergies	
6	Assessment information – qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades, external examination results, teacher assessment results, examination scripts	<ul style="list-style-type: none"> <li>• <b>Article 6(1)(c) – legal obligation</b> Regulation 3(1) Part 1 The Education (Independent School Standards) Regulations 2014</li> </ul>
7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans	
4	Parent names, contact telephone numbers, email addresses, addresses	<ul style="list-style-type: none"> <li>• <b>Article 6(1)(d) – to protect the vital interests of the data subject</b></li> </ul>
11.1	Photographs of individual students (taken by Vision Employee kept on pupil record and for ID Badges)	
12	Biometric (fingerprint) data	<ul style="list-style-type: none"> <li>• <b>Article 6(1)(b) – contract</b> to fulfil a contract between parent and caterer</li> </ul>
13	CCTV video surveillance	<ul style="list-style-type: none"> <li>• <b>Article 6(1)(e) – public task</b> Section 547 of the Education Act 1996</li> </ul>
14	Phone Call recording	

### The legitimate interests pursued by us are as follows:

Note: “Article” refers to the section of the General Data Protection Regulation under which lawful processing is permitted.

Data Ref	Personal data type:	Legitimate interests
4	Parent names, contact telephone numbers, email addresses, addresses	Article 6(1)(f) – legitimate interest To communicate with parents
6	Assessment information – examination scripts	Article 6(1)(f) – legitimate interest To support student learning
6	Assessment information – external examination results	Article 6(1)(f) – legitimate interest To communicate with students, parents and the wider community

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11.4a	First name, surname, photographs and video images (used in displays, school publications and printed garments such as hoodies and t-shirts).	Article 6(1)(f) – legitimate interest To communicate with students, parents and the wider community; to celebrate key milestones in our school community.
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**The special categories of personal data concerned are:**

Note: “Article” refers to the section of the General Data Protection Regulation under which lawful processing of special category data is permitted.

Data Ref	Special categories of personal data:	Lawful basis for processing
2	Student ethnicity, language	Article 9(2)(b) – obligation of the controller authorised by law <b>The data subject may withhold this information at the time of collection if they choose.</b>
7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans	Article 9(2)(b) – obligation of the controller authorised by law
9	Student medical information – individual healthcare plans, medication, allergies	Article 9(2)(b) – obligation of the controller authorised by law
12	Biometric (fingerprint) data	Article 9(2)(a) – explicit consent <b>We require your explicit consent for processing this data; see section 3.1</b>

### 3.1 Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Vision Academy Learning Trust to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

**The personal data that requires your explicit consent for processing is as follows:**

Data Ref	Personal data type:	Purpose of processing where Article 6(1)(a) – consent is explicitly required
6	Assessment information – examination scripts	We will request your examination script from the Exam Board to support the learning of others. At the time of requesting this consent we will also ask if we can share your name alongside the script.
6	Assessment information – external examination results	We may publish external exam results on our school website, together with the students first and surname. The results will be published in surname order.

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11.2	Photographs of individual students (taken by third party for sale to parents)	An external photographer, using his/her own equipment, also comes into school to take individual student and group photographs that are then made available for parents to purchase.
11.3	Photographs of groups of students (taken by third party for sale to parents)	
11.4	First name, surname, photographs and video images shared on Trust websites and social media	We take photographs or videos for use on Trust websites/social media. Photographs and videos may also be taken on school trips and activities for use by the school. School equipment will be used to take photographs or record images.
11.4b	Photographs and video images of individual students and groups of students (taken by third party)	An external photographer, using his or her own equipment, also comes into school to take individual and group photographs of students for use on Trust websites/social media and for sharing on the Friends of Egglecliffe School Music website/social media
11.5	First name, photographs and video images and examination results (in local or national newspapers, televised news programmes or on media website)	Occasionally Vision schools may be visited by the media to take photographs or videos of an event or particular achievement we are celebrating. Students will often appear in these images, which may feature in local or national newspapers, televised news programmes or on media websites. When filming or photography is carried out by the media they will use their own equipment, students first names will only be shared if there is a particular reason to do so.
12	Biometric (fingerprint) data	Vision schools use biometric data to operate our cashless catering system. Students are identified by a biometric system which reads their fingerprint. Our system uses an image of the fingerprint to create a mathematical algorithm and then discards the fingerprint; only the numbers remain and these cannot be re-interpreted back into a fingerprint image.

Consent for the above personal data is given at the time of collecting the information on the School Admission Form, except for Item 6 which is collected as part of our Post Results service.

You may withdraw this consent at any time by completing a **Withdrawal of Consent Form GDPR REC 4.6B**.



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### 3.2 Disclosure

Vision Academy Learning Trust has a legal obligation to routinely pass on your personal data to the third parties listed below:

Data Ref	Personal Data Type	Name of Third Party	Purpose of processing
1	Student personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, unique candidate identifier (UCI), unique learner number (ULN), care arrangements, court orders	Department for Education  ESFA  LRS ( operated by ESFA)	<ul style="list-style-type: none"> <li><b>Article 6(1)(c) - legal obligation</b></li> </ul> Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013  The National Pupil Database (NPD) is managed by the DfE and contains information about students in schools in England. Vision Academy Learning Trust is required by law to provide information about our students to the DfE as part of statutory data collections, such as the school census; some of this information is then stored in the NPD.
2	Student ethnicity, language		The DfE may share information about our students from the NPD with third parties who promote the education or wellbeing of children in England by: <ul style="list-style-type: none"> <li>Conducting research or analysis.</li> <li>Producing statistics.</li> <li>Providing information, advice or guidance.</li> </ul> The DfE has robust processes in place to ensure the confidentiality of any data shared from the NPD is maintained.  <b>Retrieve a copy of the safeguards in place here</b> <a href="https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information">https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information</a>  <a href="#">LRS privacy notice - GOV.UK (www.gov.uk)</a>
3	Student free school meal eligibility		
5	Attendance information – e.g. number of absences and absence reasons		
6	Assessment information – qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades, external examination results, teacher assessment results		
7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans		

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8	Behavioural information – e.g. number of temporary exclusions		
1-8	Personal Data Type 1-8 listed above	Destination School	<ul style="list-style-type: none"> <li><b>Article 6(1)(e) – official authority</b> processing is necessary in the exercise of official authority vested in the controller (Education Act 1996)</li> <li><b>Article 6(1)(c) - legal obligation</b> Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013</li> </ul> <p><b>Your child's destination school will have its own Privacy Policy.</b></p>
4	Parent names, contact telephone numbers, email addresses, addresses, relationship to pupil		
1-8	Personal Data Type 1-8	Local Authority Authorities and those responsible for looked after or previously looked after children Post 16 Destinations and Education Providers Welfare Call ASSET for Education	<ul style="list-style-type: none"> <li><b>Article 6(1)(c) - legal obligation</b></li> <li><b>Section 175 Education Act 2002</b> places a duty on both the Education Provider and the LA to safeguard and promote the welfare of children.</li> <li><b>Education Act 1996 Section 436A</b> imposes a duty on the LA to identify and monitor children missing education.</li> <li><b>Education Act 1996 Section 444</b> places responsibilities on the LA in terms of enforcing student attendance.</li> <li><b>Exclusion from maintained schools, academies and pupil referral units in England 2017</b> Education Providers are obliged by its funding agreement to follow current law and DfE advice on Exclusions.</li> <li><b>Education Act 1996 Section 507B</b> – responsibilities in relation to the education or training of 13-19 year olds.  <u>Students aged 13+</u>            When a student turns 13 we pass on personal information to youth support services and careers advisers.  <u>Students aged 16+</u>            Student details are also provided to post-16 education and training providers.  <b>A parent can request that only their child's name, address and date of birth is passed to the local authority in these circumstances by informing the Data Protection Officer, see section 3.5.</b>  <u>Post 16</u>  <b>This right is transferred to the student once he/she reaches the age 16.</b></li> </ul>

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			<p><b>Your child's destination school/ college will have its own Privacy Policy.</b></p> <p><b>Retrieve a copy of the Local Authority Privacy Policies in place here</b>  <a href="#">Middlesbrough Council's Privacy Policy</a>  <a href="#">Stockton Borough Council's Privacy Policy</a>  <a href="#">Redcar &amp; Cleveland Privacy Policy</a>  <a href="#">Cumbria Council Privacy Policy</a></p> <p><b>Welfare Call is used to collect the attendance of pupils classified as being a looked after child.</b>  <a href="#">Welfare Call - Privacy Notice</a></p> <p><b>ASSET for Schools is used to collect the attendance of pupils classified as being a looked after child.</b>  <a href="#">ASSET Privacy Notice</a></p>
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**The following third parties will receive your personal data for the following purpose(s) as part of our routine processing activities (public task):**

Data Ref	Personal Data Type	Name of Third Party	Purpose of processing
9	Pupil medical information – individual healthcare plans, medication, allergies	Caterlink Middlesbrough Council Catering	We share the data identified with our catering providers to cater to individual dietary requirements.
1-10	Personal Data Type 1-10	Microsoft Google Adobe Groupcall HCSS – Access Group Wonde ONE ITT Autodata / Wasabi Apple	These are the operating systems used within the Trust to create, store and share documents. Wasabi is used for off site backups.
1-10 11.1	Personal Data Type 1-10 Photographs of individual students (taken by Vision Employee kept on pupil	Capita SIMS Arbor	Arbor is replacing Capita SIMS as our electronic management information system and contains the majority of our student records. <a href="#">Capita Privacy Notice</a> <a href="#">Arbor Privacy Notice</a>

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	record and for ID Badges)	Edukey (TES)  Evolve	Staff have permissions-controlled access to this.  <a href="#">Edukey Privacy Notice</a>  <a href="#">Evolve Privacy Policy</a> Evolve is used to facilitate educational visits and school trips.
4	Parent names, contact telephone numbers, email addresses, addresses, relationship to pupil	Aim High Attendance – (previously A Star Attendance)	Aim High Attendance provide pupil attendance monitoring services to schools.  Please contact Aim High Attendance for a copy of their privacy notice.
5	Attendance information – e.g. number of absences and absence reasons		
1-9	Personal Data Type 1-9	CPOMS	CPOMS is our child protection online management information system and contains the majority of our student records including behaviour, welfare and medical records.  Staff have permissions-controlled access to this.
1	Personal Data Type 1 Name, Date of Birth, Postcode, Year Group, Level of study, school/institution name/course, Gender, Ethnicity/Student school email address	COMPASS+	COMPASS+ has access to the minimum Personally Identifiable Information as is necessary to build and maintain the system. Only pseudonymised data (replacing most identifying fields within a data record by one or more artificial identifiers, or pseudonyms) will otherwise be viewed by staff.. Student email fields will be included in the data transferred to Compass+ from 05.11.2022 Staff have permissions-controlled access to this.
1	Personal Data Type 1 Name, Date of Birth, Postcode, Year Group, Level of study, school/institution name/course, Gender, Ethnicity	One Vision	One Vision is a pilot scheme involving a number of selected pupils. Names will be anonymized before being shared with One Vision.
1	Personal Data Type 1 Name, Date of Birth, Postcode, Year Group, Level of study,	Progress Careers – previously Careers Inc	A service to provide information, advice and guidance on careers. CV's of applicants and overall generalised destination information.

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	school/institution name/course, Gender, Ethnicity		
1	Personal Data Type 1 Name, Date of Birth, Postcode, Year Group, Level of study, school/institution name/course, Gender, Ethnicity	Future Me	North East Uni Connect Programme (NEUCP) is a group of all colleges and universities in the North East of England working together to help young people think about their futures and how higher education can help them reach their goals.

1	Student personal information – Legal Forename and Surname, Middle names, gender, DOB, Candidate Number, ULN, UCI, year group	Exam Boards eAQA, OCR, Pearson EdExcel, WJEC, PET-Xi, CACHE, JCQ, NCFE, CIE	The exam boards require us to provide this information in order for the exams to be successfully administered. Please note that Legal Forename and Surname are the details that appear on the birth certificate. We are not permitted to share shortened versions of these names. Exam Boards require information for all students sitting public examinations; this is likely to be students in Years 10, 11, 12 and 13.  Staff have permissions-controlled access to this.
6	Assessment information – qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades		

1,6	Personal data 1 and 6 as above plus	Exam Boards (Special Considerations) eAQA, OCR, Pearson EdExcel, WJEC, PET-Xi, CACHE, JCQ, NCFE, CIE	For students needing special consideration, we would also share brief details of the situation / medical condition leading to disadvantage during exams or coursework.  Staff have permissions-controlled access to this.
7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans		
9	Student medical information		

1	Student personal information – Legal Forename and Surname, Middle names, gender, DOB, Candidate Number, ULN, UCI, year group	Exam Boards (Moderation) eAQA, OCR, Pearson EdExcel, WJEC, PET-Xi, CACHE, JCQ, NCFE, CIE	Information is shared with the Exam Boards to enter and coursework for external examinations.  This information may also be shared with individual moderators from each Exam Board.  Staff have permissions-controlled access to this.
6	Assessment information – qualifications being entered for and relevant unit codes and tier of entry, coursework marks		

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	or grades, teacher assessment results		
11.	Photographs and video images (forming part of student assessment record)		

1	Student personal information – Legal Forename and Surname, Middle names, gender, DOB, Candidate Number, ULN, UCI, year group	Exam Boards (Post Results Services) eAQA, OCR, Pearson EdExcel, WJEC, PET-Xi, CACHE, JCQ, NCFE, CIE	This information is shared with Exam Boards in the event of students’ enquiries about results or where they request access to scripts.  Staff have permissions-controlled access to this.
6	Assessment information – qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades, teacher assessment results		

1	Student personal information – Legal Forename and Surname, Middle names, gender, DOB, Candidate Number, ULN, UCI, year group	Exam delivery system - Certiport	The IC3 Spark Certificate (an IT exam) is completed via an online system – PearsonVUE Certiport Console 8. The data centre is located in the USA. The data of students sitting this exam will be transferred outside the European Economic Area (EEA), but it is protected under the USA Privacy Shield.
6	Assessment information – qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades		<b>Retrieve a copy of the Privacy Policy in place</b> <a href="https://home.pearsonvue.com/privacy#how-to-contact-us">https://home.pearsonvue.com/privacy#how-to-contact-us</a>

1	Student personal information – names, pupil identification number	ePraise	Vision schools track and communicate their child’s progress with parents by sharing the personal data identified with ePraise.
11.	Photographs and video images (forming part of		<b>Retrieve a copy of the Privacy Policy in place</b> <a href="https://www.epraise.co.uk/index.php?view=privacy">https://www.epraise.co.uk/index.php?view=privacy</a>

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	student assessment record)		
1	Student personal information – names, date of birth, gender, pupil identification number	FFT Aspire	We share information with FFT Aspire to enable us to calculate students’ KS2 scores to where the student should be at various points in their education. We use this information to assess ourselves.
2	Student ethnicity, language, ,		
3	Student Free school meal eligibility		
6	Assessment information examination results, teacher assessment results		
7	Student SEN provision (formerly stage) Student SEN type ranking		
1	Student personal information – names, , pupil identification number, username, profile picture	Learning Platform/Resource Providers <ul style="list-style-type: none"> <li>• Accelerated Reader</li> <li>• Bebras Computing Challenge</li> <li>• GlobalBridge</li> <li>• Kerboodle</li> <li>• Lexia</li> <li>• MicroLibrarian Systems</li> <li>• My GCSE Science</li> <li>• UK Rocketry Association (UKRA)</li> <li>• Show My Homework</li> <li>• Snakify.org</li> <li>• Yacapaca</li> </ul>	<p><a href="#">Vision schools provide students and parents access to a number of learning platforms and resources to support student learning using the personal data identified.</a></p> <p><a href="#">Retrieve a copy of the Privacy Policies in place by viewing the Privacy Policy for each learning platform / resource provider:</a></p> <p><a href="#">Accelerated Reader Privacy Policy</a></p> <p><a href="#">Bebras Computing Challenge</a></p> <p><a href="#">GlobalBridge Privacy Policy</a>  <a href="#">Kerboodle Privacy Policy</a>  <a href="#">Lexia Core Privacy Policy</a>  <a href="#">MicroLib Privacy Policy</a></p> <p><a href="#">My GCSE Science Privacy Policy</a></p> <p><a href="#">UKRA Privacy Policy</a></p> <p><a href="#">Show My Homework Privacy Policy</a></p> <p><a href="#">Snakify</a>  <a href="#">Yacapaca Privacy Policy</a></p>

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	<ul style="list-style-type: none"> <li>• Adobe CC</li> <li>• Sketchup</li> <li>• Mathswatch</li> <li>• PIXL</li> <li>• VLeBooks</li> <li>• Pearson Active Learn</li> <li>• 4Matrix</li> <li>• ASDAN</li> <li>• ASSET for Schools (Raise Online)</li> <li>• Class Charts</li> <li>• Clickview</li> <li>• Daydream Education</li> <li>• Hegarty Maths</li> <li>• Tassomai</li> <li>• Wonde</li> <li>• Times Tables Rockstars</li> <li>• Seneca Learning</li> <li>• Iachieve</li> <li>• Vocab Express</li> <li>• Marvellous Me</li> <li>• White Rose Maths</li> <li>• Bandlab</li> <li>• Bedrock</li> <li>• Plex</li> <li>• Lexplore</li> <li>• Educake</li> <li>• Thrive</li> <li>• Book Creator</li> <li>• Language Gym</li> <li>• Robotmesh &amp; Flowol</li> <li>• TES Global – Python Programming</li> <li>• Kahoot!</li> <li>• Hodder – MARK &amp; SNAP</li> <li>• CleverLili</li> <li>• Rising Stars</li> <li>• Duolingo</li> </ul>	<p><a href="#">Adobe CC Privacy Policy</a>  <a href="#">Sketchup Privacy Notice</a>  <a href="#">Mathswatch Privacy Policy</a>  <a href="#">PIXL Privacy Policy</a>  <a href="#">VL eBooks Privacy Notice</a>  <a href="#">Pearson Active Learn Privacy Notice</a></p> <p><a href="#">4matrix.org Privacy Notice</a>  <a href="#">ASDAN Privacy Notice</a>  <a href="#">Asset for Schools Privacy Notice</a></p> <p><a href="#">Class Charts Privacy Notice</a>  <a href="#">Clickview Privacy Notice</a>  <a href="#">Daydream Privacy Policy</a></p> <p><a href="#">Hegarty Maths Privacy Policy</a>  <a href="#">Tassomai Privacy Policy</a>  <a href="#">Wonde Privacy Policy</a>  <a href="#">Times Tables Rockstars Privacy Policy</a></p> <p><a href="#">Seneca Learning Ltd Privacy Notice</a></p> <p><a href="#">Vocab Express Privacy Notice</a>  <a href="#">Marvellous Me Privacy Notice</a>  <a href="#">White Rose Maths Privacy Notice</a></p> <p><a href="#">Bandlab Privacy Notice</a>  <a href="#">Bedrock Privacy Notice</a>  <a href="#">Plex Privacy Notice</a>  <a href="#">Lexplore Privacy Notice</a>  <a href="#">Educake Privacy Notice</a>  <a href="#">Thrive - Privacy Policy</a>  <a href="#">Book Creator Privacy Policy</a>  <a href="#">Language Gym Privacy Notice</a>  <a href="#">Robotmesh &amp; Flowol Privacy Policy</a></p> <p><a href="#">TES - Python Programming Privacy Notice</a></p> <p><a href="#">Kahoot! Privacy Notice</a>  <a href="#">Hodder Education Privacy Notice</a></p> <p><a href="#">Clever Lili Privacy Policy</a>  <a href="#">Hodder Education Privacy Notice</a>  <a href="#">Duolingo Privacy Notice</a>  <a href="#">Quizlet Privacy Policy</a></p>
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		<ul style="list-style-type: none"> <li>• Quizlet</li> <li>• Memrise</li> <li>• Sparx Maths</li> <li>• Carousel</li> <li>• Doublestruck</li> <li>• ZigZag</li> </ul>	<a href="#">Memrise Privacy Policy</a> <a href="#">Sparx Maths Privacy Notice</a> <a href="#">Carousel Privacy Policy</a> <a href="#">Doublestruck Privacy Notice</a> <a href="#">ZigZag Education's Privacy Policy</a>
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1	Student personal information – names, date of birth, gender, pupil identification number	LearningPlusUK GL Assessment & Cat 4 Testing No More Marking Reciprocal Reading FFT Literacy NTP My Tutor	We share information with LearningPlus UK to enable us to calculate students' assessment scores to where the student should be at various points in their education.
2	Student ethnicity, language, ,		We use this information to track progress and assess our provision.
3	Student Free school meal eligibility		
6	Assessment information examination results, teacher assessment results		GL Assessment, NGRT & CAT 4 Testing and No More Marking are used to benchmark students. Reciprocal Reading Project (in association with Queens University Belfast) is used to identify individuals that may benefit from reciprocal reading provided by FFT Literacy.
7	Student SEN provision (formerly stage) Student SEN type ranking		National Tutoring Programme (NTP) & My Tutor – used to provide tutoring to pupils.

1	Student personal information – names, date of birth, gender	CIVICA	Vision schools operate a cashless catering system. We share the data identified with NRSLtd to create numerical IDs from fingerprints to manage our cashless catering system.  <b>We require your explicit consent for processing this data; see section 3.1</b>
12	Biometric (fingerprint) data		

1	Student personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, care arrangements	NHS and other support services	We may refer your child to an NHS service such as speech and language, occupational health and Child & Adolescent Mental Health Services.
2	Student ethnicity, language		We may also refer your child to access other support services such as Educational Psychology, counselling, family therapy and play therapy.
4	Parent names, contact telephone numbers,		We will tell you before we process this information.

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	email addresses, addresses, relationship to pupil		
5	Attendance information – e.g. number of absences and absence reasons		
7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans		
8	Behavioural information – e.g. number of temporary exclusions		
9	Student medical information – individual healthcare plans, medication, allergies		
1	Student personal information – names, pupil identification number, gender	ParentMail Parent Pay Schoolcomms, School Gateway School Cloud	Vision schools use ParentMail & Parent Pay or School Comms & Gateway as a platform to communicate with parents and facilitate payment of trips and activities on our behalf. We share the personal information identified to set users up on the system.
4	Parent names, contact telephone numbers, email addresses, relationship to pupil		School Cloud is used to facilitate remote parents evening.  <b>Retrieve a copy of the Privacy Policy in place here</b> <a href="#">Parentmail Privacy policy</a> <a href="#">ParentPay Privacy Policy</a> <a href="#">School Comms &amp; Gateway Privacy Notice</a> <a href="#">School Cloud Parents Evening Privacy Notice</a>
6	Assessment information – external examination results	School Websites	Vision schools will publish selected student external examination results on their school websites. They will be published in surname order.
11.4	First name, surname, photographs and video images (used in displays, school publications, shared on school website and social media)	Social Media Twitter Facebook YouTube School Websites  Vision Website	Vision schools may take photographs or videos for use on the school website/social media. School equipment will be used to take photographs or record images.  <b>Retrieve a copy of the safeguards in place here</b> <a href="#">Twitter Privacy Policy</a>

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	Username	<a href="http://www.valt.org.uk">www.valt.org.uk</a>	<a href="#">Facebook</a> <a href="#">Google &amp; You Tube</a>  <b>We require your explicit consent for processing this data; see section 3.1</b>
11.4b	Photographs and video images of individual students and groups of students	The Friends of Egglecliffe School Music website and social media	Vision schools may take photographs or videos for use on the school website/social media and for sharing on the Friends of Egglecliffe School Music website/social media.
1	Student personal information – names, pupil identification number	Duke of Edinburgh	Only applicable to Individuals choosing to participate in the Duke of Edinburgh Award Scheme  <b>We require your explicit consent for processing this data; see section 3.1</b>
9	Student medical information – individual healthcare plans, medication, allergies		
1	Student personal information – names, pupil identification number	Tempest Photography	Individual photographs are available for sale for the personal, private use of parents; we share the data identified with Tempest Photography to enable parents to order photographs online.  <b>Retrieve a copy of the Privacy Policy in place here</b> <a href="https://www.htempest.co.uk/gdpr">https://www.htempest.co.uk/gdpr</a>  <b>We require your explicit consent for processing this data; see section 3.1</b>
4	Parent Contact telephone numbers, email addresses		
1	Student personal information – names, pupil identification number	Specialist teachers, coaches	Vision schools provide students' access to specialist teachers and coaches to support student learning and enrich our curriculum. Some of the personal data identified is shared with specialist teachers and coaches to provide appropriate pastoral care, to safeguard students and protect their vital interests.  Vision has a contract in place with all specialist teachers and coaches that protects personal information in line with the requirements under GDPR.
7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans		
9	Student medical information – individual healthcare plans, medication, allergies		

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6	Assessment information – qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades, external examination results, teacher assessment results	UCAS	<p>Students self-register on the UCAS website and input all their own data, however sixth form staff can view the information they have input and can verify examination results.</p> <p>Teaching staff will also provide an academic reference for students on the site.</p> <p><b>Retrieve a copy of the Privacy Policy in place here</b>  <a href="#">UCAS Privacy Notice</a></p>
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1	Student personal information – names, pupil identification number	National Tutoring Programme	The National Tutoring Programme (NTP) will provide additional support to schools to help disadvantaged pupils whose education has been most affected by school closures.
7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans		

1	Student personal information – names, pupil identification number	Lexplore	<p>Lexplore is a tool to measuring reading attainment and provide intervention where necessary.</p> <p><b>We require your explicit consent for processing this data; see section 3.1</b></p>
11.6	Eye Movement recordings, Audio Recordings, Test Results		

**We may also require consent to share your data with additional Learning programmes if we believe it is beneficial for your child.**

### 3.3 Retention period

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Vision Academy Learning Trust will process personal data for the duration that students attend secondary school and/or Sixth Form College. We hold student data in the form of secure paper and electronic records and store the personal data according to the Information and Records Management Society Information Management Toolkit for Schools.

Ref	Personal data type:	Retention Period
1	Student personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, care arrangements, court orders	Total retention period - Date of Birth of the pupil + 25 years (Limitation Act 1980 (Section 2))
2	Student ethnicity, language	
3	Student Free school meal eligibility	
4	Parent names, contact telephone numbers, email addresses, addresses, relationship to pupil	
5	Attendance information – number of absences, sessions late, absence reasons	
6	Assessment information – qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades, external examination results, teacher assessment results, examination scripts	Total retention period - Date of Birth of the pupil + 25 years (Limitation Act 1980 (Section 2))  Examination Certificates are retained for exam date + 10 years  Examination Scripts are retained for exam date + 3 years
7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans	Date of Birth of the pupil + 25 years THEN REVIEW
8	Behavioural information – e.g. number of temporary exclusions	Total retention period - Date of Birth of the pupil + 25 years (Limitation Act 1980 (Section 2))
9	Student medical information – individual healthcare plans, medication, allergies	
10	Post 16 destinations (education, employment, training) and destinations of those students who leave before the normal leaving age, or mid-year	
11.0	Photographs and video images (forming part of student assessment record)	Where possible students' work should be returned to the student at the end of the academic year; otherwise current year + 1 year
11.1	Photographs of individual students (taken by Vision Employee kept on pupil record and for ID Badges)	Year of Leaving +1 year
11.2	Photographs of individual students (taken by third party for sale to parents)	Not retained
11.3	Photographs of groups of students (taken by third party for sale to parents)	Year of Leaving +5 years
11.4a	Photographs and video images (used in displays, school publications)	Year of Leaving +10 years

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11.4	Photographs and video images shared on school website and social media	Year of Leaving +10 years
12	Biometric (fingerprint) data	Not retained
13	CCTV video surveillance	6 Months
14	Call Recordings	30 days

#### **3.4 Your rights as a data subject**

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that Vision Academy Learning Trust refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in clause 3.5 below.

All of the above requests will be forwarded on should there be a third party involved (as stated in 3.2 above) in the processing of your personal data.

To make a subject access request access, use the form **GDPR\_REC\_4.2**.

#### **3.5 Complaints**

In the event that you wish to make a complaint about how your personal data is being processed by Vision Academy Learning Trust (or third parties as described in 3.4 above), or how your complaint has been handled, you have the right to lodge a complaint directly with the supervisory authority and Vision Academy Learning Trust’s Data Protection Officer.

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The details for each of these contacts are:

	<b>Supervisory authority contact details</b>	<b>Data Protection Officer (DPO) contact details</b>
Name:	Information Commissioners Office	Ms Andrea Sotheby
Address	Information Commissioner's Office Wycliffe House, Water Lane Wilmslow, Cheshire, SK9 5AF	Egglescliffe School, Urray Nook Road, Egglescliffe, Stockton-on-Tees, TS16 0LA
Email:	<a href="https://ico.org.uk/global/contact-us/email/">https://ico.org.uk/global/contact-us/email/</a>	dpo@valt.org.uk
Telephone:	0303 123 1113	01642 051020

### Document Owner and Approval

The Data Protection Officer / Trust Compliance Manager is the owner of this document and is responsible for ensuring that this record is reviewed in line with the review requirements of the GDPR.

A current version of this document is available to all members of staff on the Vision Staff SharePoint and is published on [www.valt.org.uk/privacy](http://www.valt.org.uk/privacy). It is your responsibility to periodically check for updates.

Signature: A. Sotheby

Date: 01/06/2023

### Change History Record

Issue	Description of Change	Approval	Date of Issue
0.1	Initial issue	S White, D Gratton, L Oyston, K Goodes, J Clarke	15/5/18
1	Publication		21/5/18
2	Third party processing additions – Learning platforms and resources Snakify.org, Bebras Computing Challenge	J Turner DPO	4/9/2018

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3	Third party processing additions – Exams administrator PET-Xi, PearsonVUE Certiport	J Turner DPO	14/1/2019
4	Online resource GlobalBridge	J Turner DPO	20/5/19
4	Change of lawful basis for processing for 11.1 Photographs of individual pupils (taken by third party kept on pupil record) from <b>consent to vital interest.</b>	L Oyston, S White	20/5/19
4	Creation of data reference group 11.4a First name, surname, photographs and video images (used in displays, school publications and printed garments such as hoodies and t-shirts) to split from 11.4 Trust Websites and social media	L Oyston, S White	20/5/19
4	Change of lawful basis for processing for 11.4a from <b>consent to legitimate interest.</b>	L Oyston, S White	20/5/19
5	Change of DPO to A Sotheby	A Sotheby	05/11/2019
5	Removal of Advanced Progresso in 1-10 & 11.1	A Sotheby	05/11/2019
6	Insertion of Capita SIMS in 1-10 & 11.1	A Sotheby	26/02/2020
6	Insertion of Compass+ and careers guidance information in 1	A Sotheby	26/02/2020
7	Insertion of Learning Platforms & GL Assessment, CAT 4 testing, No More Marking, School Cloud	A Sotheby	18/09/2020
8	Insertion of NTP, I Achieve	A Sotheby	10/01/2021
9	Insertion of Lexplore, Plex, & Bedrock	A. Sotheby	04/05/2021
10	Insertion of Welfare Call & Thrive	A. Sotheby	01/10/2021
11	Change of retention for CCTV	A. Sotheby	09/12/2021
12	Insertion of future Me	A. Sotheby	25/01/2022
13	Insertion of Evolve & Book Creator	A. Sotheby	28/02/2022
14	Insertion of My Tutor & Language Gym	A. Sotheby	28/03/2022



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15	Insertion of Robotmesh & Flowol and TES Global – Python Programming	A. Sotheby	06/04/2022
16	Insertion of Kahoot!	A. Sotheby	27/06/2022
17	Careers Inc changed to Progress Careers, Hodder MARK & SNAP	A. Sotheby	14/09/2022
18	A Star Attendance changed to Aim High and Autodata/ Wasabi added	A. Sotheby	05/10/2022
19	Compass+ now uses Groupcall to collect data and requires student's school email addresses	A. Sotheby	08/11/2022
20	Addition of Duolingo, Quizlet & Memrise	A. Sotheby	31/01/2023
21	Addition of ASSET for Schools for MIS purposes	A. Sotheby	15/02/2023
22	Addition of Arbor MIS which will replace SIMS.	A. Sotheby	01/06/2023
23	Addition of Sparx Maths	A. Sotheby	04/09/2023
24	Addition of Carousel	A. Sotheby	14/11/2023
25	Addition of Doublestruck	A Sotheby	20/03/2024
26	Addition of ZigZag	A Sotheby	20/05/2024