

PRIVACY NOTICE (TIER 4)

PRIMARY PUPILS AND THEIR FAMILIES

Scope

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

Responsibilities

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.

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.

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: Eggescliffe School, Urray Nook Road, Eggescliffe, Stockton-on-Tees, TS16 0LA

ICO Registration Number ZA194005

Our Data Protection Officer can be contacted directly here:

dpo@valt.org.uk

01642 051020

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PRIMARY PUPILS AND THEIR FAMILIES

The personal data we would like to collect from/process about Vision primary school pupils and their families is:

Data Ref	Personal data type:	Source (where Vision Academy Learning Trust obtained the personal data from if it has not been collected directly from you, the data subject.):
1	Pupil personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, care arrangements, court orders	
2	Pupil ethnicity, language	
3	Pupil Free school meal eligibility	Stockton Borough Council Confidential Free School Meals Helpline
4	Parent/Carer names, contact telephone numbers, email addresses, addresses, marital status	
5	Attendance information – number of absences, sessions late, absence reasons	
6	Assessment information – national curriculum assessment results, teacher assessment results	Teaching Staff
7	Pupil SEN provision (formerly stage) Pupil SEN type ranking, provision maps, support plans	Teaching Staff
8	Behavioural information – e.g. number of temporary exclusions	Head Teacher
9	Pupil medical information – individual healthcare plans, medication, allergies	
10.1	Photographs and video images (forming part of pupil assessment record)	Teaching Staff, Seesaw
10.2	Photographs of individual pupils (taken by third party kept on pupil record)	Tempest Photography
10.3	Photographs of individual pupils (taken by third party for sale to parents)	Tempest Photography
10.4	Photographs of groups of pupils (taken by third party for sale to parents)	Tempest Photography
10.5a	First name, surname, photographs and video images (used in displays, school publications and printed garments such as hoodies and t-shirts).	Teaching Staff
10.5	First name, photographs and video images shared on school website and social media	Teaching Staff
10.6	First name, photographs and video images (in local or national newspapers, televised news programmes or on media website)	
11	CCTV video surveillance (<i>Junction Farm and The Links Primary only</i>)	
12	Telephone call recordings (<i>Junction Farm Primary and The Links Primary only</i>)	

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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	Pupil personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, care arrangements, court orders	To support pupil learning To monitor and report on pupil progress To provide appropriate pastoral care To safeguard the individuals on our premises
2	Pupil ethnicity, language	To assess the quality of our service To maintain school information required by law
3	Pupil free school meal eligibility	To monitor and report on pupil progress To provide appropriate pastoral care To maintain school information required by law
4	Parent/Carer names, contact telephone numbers, email addresses, addresses, marital status	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 pupil progress To provide appropriate pastoral care To safeguard the individuals on our premises To maintain school information required by law
6	Assessment information – national curriculum assessment results, teacher assessment results	To monitor and report on pupil progress To assess the quality of our service To provide appropriate pastoral care To maintain school information required by law
7	Pupil SEN provision (formerly stage) Pupil SEN type ranking, provision maps, support plans	To monitor and report on pupil 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 pupil learning To monitor and report on pupil 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	Pupil medical information – individual healthcare plans, medication, allergies	To provide appropriate pastoral care To safeguard the individuals on our premises
10.1	Photographs and video images (forming part of pupil assessment record)	To monitor and report on pupil progress
10.2	Photographs of individual pupils (taken by third party kept on pupil record)	To provide appropriate pastoral care To safeguard the individuals on our premises
10.5a	First name, surname, photographs and video images (used in displays, school publications and printed garments such as hoodies and t-shirts).	To communicate with parents and wider community
10.5	First name, photographs and video shared on school website and social media	
10.6	First name, photographs and video images (in local or national newspapers, televised news programmes or on media website)	
11	CCTV video surveillance	
12	Telephone call recordings	To safeguard the individuals on our premises

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

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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	Pupil personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, care arrangements, court orders	Article 6(1)(e) – official authority processing is necessary in the exercise of official authority vested in the controller (Education Act 1996) Article 6(1)(c) - legal obligation Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013
2	Pupil ethnicity, language	
3	Pupil free school meal eligibility	
4	Parent/Carer names, contact telephone numbers, email addresses, addresses, marital status	
5	Attendance information – e.g. number of absences and absence reasons	
6	Assessment information – national curriculum assessment results, teacher assessment results	
7	Pupil SEN provision (formerly stage) Pupil SEN type ranking, provision maps, support plans	
8	Behavioural information – e.g. number of temporary exclusions	
9	Pupil medical information – individual healthcare plans, medication, allergies	
10.1	Photographs and video images (forming part of pupil assessment record)	
7	Pupil SEN provision (formerly stage) Pupil SEN type ranking, provision maps, support plans	Article 6(1)(c) – legal obligation: Section 100 Children and Families Act 2014 Article 6(1)(d) – vital interest
9	Pupil medical information – individual healthcare plans, medication, allergies	
6	Assessment information – national curriculum assessment results, teacher assessment results	Article 6(1)(c) – legal obligation Regulation 3(1) Part 1 The Education (Independent School Standards) Regulations 2014
7	Pupil SEN provision (formerly stage) Pupil SEN type ranking, provision maps, support plans	
4	Parent/Carer names, contact telephone numbers, email addresses, addresses	Article 6(1)(d) – to protect the vital interests of the data subject
10.2	Photographs of individual pupils (taken by third party kept on pupil record)	
11	CCTV video surveillance	Article 6(1)(e) – official authority Section 547 of the Education Act 1996
12	Telephone call recordings	Article 6(1)(d) – to protect the vital interests of the data subject

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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/Carer names, contact telephone numbers, email addresses, addresses	Article 6(1)(f) – legitimate interest To communicate with parents
10.5a	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 parents and wider community; to celebrate key milestones in our school community.

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	Pupil ethnicity, language	Article 9(2)(b) – obligation of the controller authorised by law The data subject may withhold this information at the time of collection if they choose.
7	Pupil SEN provision (formerly stage) Pupil SEN type ranking, provision maps, support plans	Article 9(2)(b) – obligation of the controller authorised by law
9	Pupil medical information – individual healthcare plans, medication, allergies	Article 9(2)(b) – obligation of the controller authorised by law

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
10.3	Photographs of individual pupils (taken by third party for sale to parents)	An external photographer, using his/her own equipment, also comes into school in to take individual student and group photographs that are then made available for parents to purchase
10.4	Photographs of groups of pupils (taken by third party for sale to parents)	
10.5	First name, photographs and video images shared on Trust websites and social media	We may 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.

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10.6	First name, photographs and video images (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.
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Consent for the above personal data is given at the time of collecting the information on the School Admission Form.

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

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	Pupil personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, care arrangements.	Department for Education ESFA LRS (operated by ESFA)	Article 6(1)(c) - legal obligation 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 pupils in schools in England. Vision Academy Learning Trust is required by law to provide information about our pupils 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	Pupil ethnicity, language		The DfE may share information about our pupils from the NPD with third parties who promote the education or wellbeing of children in England by:
3	Pupil free school meal eligibility		Conducting research or analysis.
5	Attendance information – e.g. number of absences and absence reasons		Producing statistics. Providing information, advice or guidance.

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6	Assessment information – national curriculum assessment results, teacher assessment results		<p>The DfE has robust processes in place to ensure the confidentiality of any data shared from the NPD is maintained.</p> <p>Find out further information here</p> <p>https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information</p> <p>LRS privacy notice - GOV.UK (www.gov.uk)</p>
7	Pupil SEN provision (formerly stage) Pupil SEN type ranking, provision maps, support plans		
8	Behavioural information – e.g. number of temporary exclusions		
1-9	Personal Data Type 1-9 listed above	Destination School	<p>Article 6(1)(e) – official authority processing is necessary in the exercise of official authority vested in the controller (Education Act 1996)</p> <p>Article 6(1)(c) - legal obligation</p> <p>Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013</p> <p>Your child's destination school will have its own Privacy Policy.</p>
4	Parent/Carer names, contact telephone numbers, email addresses, addresses, marital status		
1-8	Personal Data Type 1-8	Local Authority Authorities and those responsible for looked after or previously looked after children Welfare Call	<p>Article 6(1)(c) - legal obligation</p> <p>Section 175 Education Act 2002 places a duty on both the Education Provider and the LA to safeguard and promote the welfare of children.</p> <p>Education Act 1996 Section 436A imposes a duty on the LA to identify and monitor children missing education.</p> <p>Education Act 1996 Section 444 places responsibilities on the LA in terms of enforcing pupil attendance.</p> <p>Exclusion from maintained schools, academies and pupil referral units in England 2017 Education Providers are obliged by its funding agreement to follow current law and DfE advice on Exclusions.</p>

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			<p>Retrieve a copy of the Privacy Policies in place here</p> <p>Middlesbrough Council's Privacy Policy</p> <p>Stockton Borough Council's Privacy Policy</p> <p>Welfare Call is used to collect the attendance of pupils classified as being a looked after child.</p> <p>Welfare Call - Privacy Notice</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
1-9	Personal Data Type 1-9	Capita SIMS	Arbor is replacing SIMS as our electronic management information system and contains the majority of our pupil records.
10.2	Photographs of individual pupils (taken by third party kept on pupil record)	Arbor	Capita Privacy Notice Arbor Privacy Notice
		Edukey (TES) For Provision Mapping	Staff have permissions-controlled access to this. Edukey Privacy Notice
1-9	Personal Data Type 1-9	CPOMS	CPOMS is our child protection online management information system and contains the majority of our pupil records including behavior, welfare and medical records. Staff have permissions-controlled access to this.
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	Pupil personal information - names, date of birth, gender, contact telephone numbers, addresses,	CRB Cunningham	Junction Farm and The Links operate a cashless catering system. We share the data identified with CRB Cunningham to enable children to choose their

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	pupil identification number		meals and record transactions on their child meal account.
3	Free School Meal Eligibility		
5	Attendance information – absences		
10.2	Photographs of individual pupils (taken by third party kept on pupil record)		
1-9	Personal Data Type 1-9	Education Five	<p>Vision schools manage pupil attendance with an external provider. We share the data identified on a termly basis to work with parents to improve their child's attendance.</p> <p>Vision has a contract in place with all that protects personal information in line with the requirements under GDPR</p>
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	Pupil personal information – names, pupil identification number	<p>Learning Platform Providers and online resources</p> <p>2Build a Profile</p> <p>British Cycling</p> <p>Education City</p> <p>Lexia Core</p>	<p>Vision schools provide pupils and parents access to a number of learning platforms and online resources to support pupil learning using the personal data identified.</p> <p>Retrieve a copy of the Privacy Policies in place here:</p> <p>2Build a Profile</p> <p>British Cycling (Ready Set Ride)</p> <p>Education City Privacy Policy</p> <p>Lexia Core Privacy Policy</p>

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		MyMaths	MyMaths Privacy Policy
		Purple Mash	Purple Mash Privacy Policy
		SPAG.com	SPAG.com Privacy Policy
		Times Tables Rockstars	Times Tables Rockstars Privacy Policy
		Teach Your Monster to Read	Teach Your Monster to Read Privacy Notice
		Word/Number Shark	Word Shark/Number Shark Privacy Policy
		Spelling Shed	Spelling Shed Privacy Policy
		Grammar & Spelling Bug	Grammar & Spelling Bug Privacy Policy
		Literacy Shed +	Literacy Shed + Privacy Notice
		Showbie	Showbie Privacy Notice
		White Rose Maths	White Rose Maths Privacy Notice
		Doodlemaths & Tables	Doodle Maths & Tables Privacy Notice
		Primary Languages Network VLE	Primary Languages Network Privacy Notice
		Scratch	Scratch Privacy Policy
		Tinkercad	Tinkercad Privacy Notice
		Canva	Canva Privacy Policy
		Turtle Academy	Turtle Academy Privacy Policy
		Star Reader	Star Reader Privacy Notice
		Language Angels	Language Angels Privacy Notice

4	Parent/Carer names, email addresses, addresses	Mailchimp	Chandlers Ridge Academy uses Mailchimp to create its weekly eNewsletter using the personal information identified.
10.5	First name, photographs and video images (used in displays, school)		

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	publications, shared on school website and social media)		<p>The email addresses of parents who have signed up to the eNewsletter are held by Mailchimp on the mailing list.</p> <p>Every email that is sent gives the user facility to unsubscribe.</p> <p>We require your explicit consent for processing this data; see section 3.1</p> <p>Retrieve a copy of the Privacy Policy in place here</p> <p>https://mailchimp.com/legal/privacy/</p>
1	Pupil personal information – names, pupil identification number	MarvellousMe SeeSaw	<p>Some Vision schools track and communicate their child’s progress with parents by sharing the personal data identified with MarvellousMe and photos and videos of work and presentations via See Saw.</p> <p>Retrieve a copy of the Privacy Policy in place</p> <p>http://marvellousme.com/privacy-policy/</p> <p>SeeSaw Privacy Policy</p>
10.1	Photographs and video images (forming part of pupil assessment record)		
1	Pupil personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, care arrangements.	NHS and other support services	<p>We may refer your child to an NHS service such as speech and language, occupational health and Child & Adolescent Mental Health Services.</p> <p>We may also refer your child to access other support services such as Educational Psychology, counselling, family therapy and play therapy.</p> <p>We will tell you before we process this information.</p>
2	Pupil ethnicity, language		
4	Parent/Carer names, contact telephone numbers, email		

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	addresses, addresses, marital status		
5	Attendance information – e.g. number of absences and absence reasons		
7	Pupil SEN provision (formerly stage) Pupil SEN type ranking, provision maps, support plans		
8	Behavioural information – e.g. number of temporary exclusions		
9	Pupil medical information – individual healthcare plans, medication, allergies		

	All personal information within this privacy notice	OneIT SS Autodata/ Wasabi	<p>OneIT are the providers of hardware, software and network administration, installation, maintenance and IT support desk services to Vision schools.</p> <p>OneIT Staff have permissions-controlled access to this.</p> <p>Autodata/ Wasabi are used for offsite data backup</p>
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1	Pupil personal information – names, , pupil identification number	ParentMail	<p>Vision schools use ParentMail 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.</p> <p>Retrieve a copy of the Privacy Policy in place here</p> <p>https://www.parentmail.co.uk/privacy-policy</p>
4	Parent/Carer names, contact telephone numbers, email addresses		

1	Student personal information – names, date of birth, gender,		We share information with FFT Aspire and the School Data Company to enable us to calculate
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	pupil identification number	School Performance Management	pupils' attainment to where they should be at various points in their education. We use this information to assess pupils performance.
2	Student ethnicity, language		
3	Student Free school meal eligibility	FFT Aspire School Data Company	
6	Assessment information – national curriculum assessment results, teacher assessment results	NFER	
7	Student SEN provision (formerly stage) Student SEN type ranking		

10.5	First name, photographs and video images shared on school website and social media.	<p>Social Media</p> <p>Twitter Facebook Youtube</p> <p>School Websites</p> <p>Chandlers Ridge Junction Farm The Links Whinstone</p> <p>Vision Website www.valt.org.uk</p>	<p>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.</p> <p>Retrieve a copy of the Privacy Policies in place here</p> <p>Twitter Privacy Policy</p> <p>Facebook Privacy Policy</p> <p>https://policies.google.com/privacy?hl=en-GB (for google and youtube)</p> <p>We require your explicit consent for processing this data; see section 3.1</p>
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1	Student personal information – names, gender	<p>School Swimming Lessons</p> <p>Tees Active</p>	All Vision Primary schools work with Tees Active to deliver primary school swimming lessons to meet the National Curriculum. We share the data
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2	Pupil ethnicity, language	Swimphony	<p>identified with Tees Active to allow an effective risk assessed swimming lesson.</p> <p>Junction Farm, The Links and Whinstone Primaries share this information securely using a system called Swimphony.</p> <p>Retrieve a copy of the Privacy Policy in place here</p> <p>http://kinetic-insight.com/swimphonylegal/</p>
7	Student SEN provision (formerly stage) Student SEN type ranking		
9	Pupil medical information – individual healthcare plans, medication, allergies		
1	Pupil personal information – names, pupil identification number	Tapestry	<p>Some Vision schools track and communicate their child's progress in EYFS with parents by sharing the personal data identified with Tapestry.</p> <p>Retrieve a copy of the Privacy Policy in place here</p> <p>https://tapestry.info/privacy.html</p>
10.1	Photographs and video images (forming part of pupil assessment record)		
1	Pupil personal information – names, pupil identification number	Tempest Photography	<p>We request a photograph of your child for their pupil record to provide appropriate pastoral care, to safeguard pupils and protect their vital interests. Individual photographs are available for sale to parents; we share the data identified with Tempest Photography to enable parents to order photographs online.</p> <p>Retrieve a copy of the Privacy Policy in place here</p> <p>https://www.htempest.co.uk/gdpr</p> <p>We require your explicit consent for processing this data; see section 3.1</p>
4	Parent/Carer Contact telephone numbers, email addresses		
1	Pupil personal information – names, , pupil identification number	Specialist teachers, coaches	<p>Vision schools provide pupils' access to specialist teachers and coaches to support pupil 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 pupils and protect their vital interests</p> <p>Vision has a contract in place with all specialist teachers and coaches that protects personal</p>
7	Pupil SEN provision (formerly stage) Pupil SEN type ranking, provision maps, support plans		

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9	Pupil medical information – individual healthcare plans, medication, allergies	information in line with the requirements under GDPR.
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We may also require consent to share your data with additional Learning programmes if we believe it is beneficial for your child.

Retention period

Vision Academy Learning Trust will process personal data for the duration that your child attends primary school. We hold pupil 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	Pupil personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, care arrangements, court orders	Retained whilst the child remains at the primary school. File follows pupil into secondary school
2	Pupil ethnicity, language	Total retention period - Date of Birth of the pupil + 25 years (Limitation Act 1980 (Section 2))
3	Pupil Free school meal eligibility	
4	Parent/Carer names, contact telephone numbers, email addresses, addresses, marital status	
5	Attendance information – number of absences, sessions late, absence reasons	
6	Assessment information – national curriculum assessment results, teacher assessment results	Current year + 6 years File follows pupil into secondary school
7	Pupil SEN provision (formerly stage) Pupil SEN type ranking, provision maps, support plans	Date of Birth of the pupil + 25 years File follows pupil into secondary school
8	Behavioural information – e.g. number of temporary exclusions	Retained whilst the child remains at the primary school. File follows pupil into secondary school
9	Pupil medical information – individual healthcare plans, medication, allergies	Date of Birth of the pupil + 25 years File follows pupil into secondary school
10.1	Photographs and video images (forming part of pupil assessment record)	Where possible pupils' work should be returned to the pupil at the end of the academic year; otherwise current year + 1 year
10.2	Photographs of individual pupils (taken by third party kept on pupil record)	Year of Leaving +1 year
10.3	Photographs of individual pupils (taken by third party for sale to parents)	Not retained
10.4	Photographs of groups of pupils (taken by third party for sale to parents)	Year of Leaving +5 years
10.5a	Photographs and video images (used in displays, school publications)	Year of Leaving +10 years
10.5	Photographs and video images (shared on school website and social media)	Year of Leaving +10 years
11	CCTV video surveillance	7 days
12	Telephone call recordings	30 days

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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**.

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.

The details for each of these contacts are:

	Supervisory authority contact details	Data Protection Officer (DPO) contact details
Name:	Information Commissioners Office	Ms A Sotheby
Address line 1:	Information Commissioner's Office Wycliffe House, Water Lane	Egglecliffe School, Urlay Nook Road, Egglecliffe, Stockton-on-Tees, TS16 0LA

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	Wilmslow, Cheshire, SK9 5AF	
Email:	https://ico.org.uk/global/contact-us/email/	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 web page and is published on www.valt.org.uk/privacy.

Signature: A Sotheby

Date: 12/09/2023

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Change History Record

Issue	Description of Change	Approval	Date of Issue
0.1	Initial issue	S White, K Norton, L Daly, L Lidgard, M Poppitt, J Clark	16/5/18
1	Publication		21/5/18
2	Page 8 – Third party disclosure to Caterlink and Middlesbrough Council Catering	J Turner DPO	4/9/18
3	Third Party disclosures updated to include CRB Cunningham (cashless catering), Tees Active (School Swimming) and Spelling Shed (learning platform).	J Turner DPO	15/1/19
4	Learning Platforms 2Build a Profile and Ready Set Ride	J Turner DPO	20/5/19
4	Change of lawful basis for processing for 10.1 Photographs and video images (forming part of pupil assessment record) from consent to public authority.	K Norton, L Daly, L Lidgard, M Poppitt, S White	
4	Change of lawful basis for processing for 10.2 Photographs of individual pupils (taken by third party kept on pupil record) from consent to vital interest.	K Norton, L Daly, L Lidgard, M Poppitt, S White	
4	Creation of data reference group 10.5a First name, surname, photographs and video images (used in displays, school publications and printed garments such as hoodies and t-shirts) to split from	K Norton, L Daly, L Lidgard, M Poppitt, S White	

PRIVACY NOTICE (TIER 4)

PRIMARY PUPILS AND THEIR FAMILIES

	10.5 Trust Websites and social media		
4	Change of lawful basis for processing for 10.5a from consent to legitimate interest.	K Norton, L Daly, L Lidgard, M Poppitt, S White	
5	Addition of SeeSaw into 10.1 and change of DPO	A Sotheby DPO	10/11/19
6	Reformatted and reviewed	A. Sotheby DPO	30/04/20
7	NFER Added	A Sotheby	18/09/2020
8	Reviewed	A Sotheby	01/04/2021
9	Reviewed	A. Sotheby	02/09/2021
10	Reviewed	A. Sotheby	06/04/2022
11	Reviewed	A. Sotheby	05/09/2022
12	Addition of Primary Languages Network	A. Sotheby	14/09/2022
13	Addition of Autodata and Wasabi	A. Sotheby	05/10/2022
14	Addition of Scratch, Tinkercad, Canva, Turtle Academy, Star Reader, Language Angels	A. Sotheby	25/05/2023
15	Addition of Arbor MIS which will replace SIMS.	A. Sotheby	01/06/2023
16	Reviewed	A. Sotheby	12/09/2023