

# PRIVACY NOTICE

Discovery Multi-Academy Trust Service Specific – Insight Pupil Tracker



Being transparent and providing accessible information to individuals about how we use personal information is a key element of the Data Protection Act 2018 and the General Data Protection Regulation (Regulation (EU) 2016/679).

## The information being processed

As part of our legal obligations, Discover Multi-Academy Trust are required to collect data through the monitoring of teaching, assessment and delivery of objectives to track the progress and attainment of the children. The information being processed is:

- Childs Name
- Childs DOB
- Childs PP, EAL, SEN, FSM status
- Unique Pupil Number (UPN)
- Legal first & last names
- Preferred first & last names
- Date of birth
- Gender
- Date pupil joined the school
- Date pupil left the school
- Ethnicity
- EAL status
- FSM history
- SEN history
- Service child status
- In-care status
- Attendance summaries

## Information sharing

The practice of tracking pupils, the type of data being processed and the purpose of the processing is not new. However, to ensure that the Trust can efficiently and effectively monitor the delivery of teaching and the outcomes for children, we will now be using an online pupil tracker called Insight. This will provide the school with dynamic reporting functions that will help us to ensure that our curriculum and interventions for vulnerable groups are having a positive effect.

We will only provide information about pupils to enable us to make good use of the system and we will only ever share your information if we are satisfied that our partners or suppliers have sufficient measures in place to protect your information in the same way that we do.

We will never share your information for marketing purposes.

## Retention periods

The data shared will be destroyed when whichever of the following occurs first:

- a) Within 30 days of the contract being terminated (including the end of any trial period); or
- b) When your child leaves our school

### **Purpose of processing personal information**

The school will be processing the information to enable us, to determine how well pupils are doing in all subjects, identify areas for development, to document Individual Education Plans and to deliver the requirements set out in Educational Health and Care Plans. The data will also allow us to monitor the effectiveness of class teaching, our curriculum, our interventions and to make improvements.

The Data Protection Act 2018 and the General Data Protection Regulation ensure that we comply with a series of data protection principles. These principles are there to protect you and they make sure that we:

- Process all personal information lawfully, fairly and in a transparent manner.
- Collect personal information for a specified, explicit and legitimate purpose.
- Ensure that the personal information processed is adequate, relevant and limited to the purposes for which it was collected.
- Ensure the personal information is accurate and up to date.
- Keep your personal information for no longer than is necessary for the purpose(s) for which it was collected.
- Keep your personal information securely using appropriate technical or organisational measures.

### **The lawful basis for processing your personal data**

- Legal Obligation: the processing is necessary for us to comply with the law.
  - Education (Independent School Standards) Regulations 2014
  - SEND Code of Practice - statutory guidance on duties, policies and procedures relating to Part 3 of the Children and Families Act 2014
  - Academies Act 2010

Where special category information is collected, GDPR also requires that we have a condition for processing in addition to the lawful basis. Our condition for processing this information is 'Statutory etc. and government purposes' and/or 'Equality of opportunity or treatment' (where we are monitoring the effects of provision to specific groups of pupils).

### **Your rights**

You have certain rights under the Data Protection Act 2018 and the EU General Data Protection Regulations (GDPR), these are:

- The right to be informed via privacy notices such as this.
- The right of access to any personal information the council holds about you.
- The right of rectification, we must correct inaccurate or incomplete data within one month.
- The right to restrict processing. You have the right to the suppression of your personal data. We can retain just enough information about you to ensure that the restriction is respected in future.
- You have rights in relation to automated decision making and profiling, to reduce the risk that a potentially damaging decision is taken without human intervention.

### **Processing your information for other reasons**

We may need to process or share your information for a legal reason, outlined in the Data Protection Act, which is not related to the pupil tracking processing, for example:

- To protect a child, an adult with care and support needs, or member of the public
- For the purposes of the prevention and/or detection of crime.
- For the assessment or collection of a tax or duty
- Where the disclosure is directed by the court or required by law

Your information will only be shared where we have a lawful basis for doing so.

- **Details of transfers to third country and safeguards**

Your personal data will be stored and processed on servers hosted in Amazon Web Services (AWS) facilities in London and Azure's UK based data centres.

**Data Controller**

Discovery Multi-Academy Trust is registered as a data controller with the Information Commissioner's Office (registration number: ZA240694). The school will remain the data controller for the information being processed on the Insight system.

Contact details for the school's Data Protection Officer are:

Liz Easterbrook, Plymouth City Council, , Ballard House, West Hoe Road, Plymouth, PL1 3BJ, telephone 01752 398380 or email at [dataprotectionofficer@plymouth.gov.uk](mailto:dataprotectionofficer@plymouth.gov.uk)

**Information Commissioners Office**

If you remain dissatisfied with the way we have handled or shared your personal data you have the right to raise a complaint with the Information Commissioner's Office. They can be contacted at:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF  
Tel: 0303 123 1113 <https://ico.org.uk/make-a-complaint/>