



PRIVACY NOTICE FOR ATTENDANCE DATA

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

This data is collected in a number of ways but namely via the Local Authority, Department for Education (DfE), registration forms, secure links with other School's Information Management System and daily attendance registers. This document provides information on the data collected and how it is used.

The information being processed:

The Trust is collecting the following information to ensure that all children of school age are receiving an education and to work with the Local Authority and Department for Education to improve attendance in schools resulting in better educational outcomes for children and a reduction in the risk of harm.

- Personal identifiers for your child (such as name, unique pupil number, date of birth);
- Characteristics (such as ethnicity, sex and free school meal eligibility);
- Looked After Children;
- Special educational needs (including the needs and ranking);
- Attendance (such as sessions attended, number of absences, absence reasons and attendance sub codes);

Information sharing:

The joint sharing of information is vital for safeguarding and to ensure that the Trusts provides an efficient and effective education. This includes working within statutory guidance such as Children Missing Education (CME) and Keeping Children Safe in Education and other DfE guidelines.

As a part of a statutory requirement the Trust share pupil attendance data, together with a range of other school and pupil data, with the DfE on a termly basis. The DfE have recognised that termly attendance reporting can be inefficient in promptly addressing issues and have asked schools, that have agreed to take part, to share this data on a daily basis to support earlier trend analysis; speedier interventions; better safeguarding support, protecting children from harm; inform operational, policy and strategic decision making and aid Covid recovery work. For more information please see the DfE's privacy notice [Privacy Notice School Attendance Data Collection v2.0 Feb 22.pdf - Google Drive](#).

Discovery Multi Academy Trust will therefore be sharing attendance data with the DfE, via the services of a company, working under a contract with the DfE, called Wonde. Wonde are able to connect the relevant school data, with the DfE, via a secure hub to hub data sharing process. We will only share the attendance information that the DfE need for this processing. Wonde are widely used in the education sector for the safe and secure sharing of information.

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

- We will only keep attendance registers for a period of 3 years.
- The DfE will keep this information for 66 years as outlined in their privacy notice.
- Personal Data will be safely destroyed or deleted when it is no longer needed.



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Purpose of processing personal information

The Data Protection Act 2017 and the EU General Data Protection Regulation ensure that we comply with a series of data protection principles when processing personal data. 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;

Special categories of personal data

We will only process special categories of data (also known as sensitive data) about you where we are legally obliged to do so or are authorised to do so in law. Where we process your special categories of data in relation to the daily reporting on attendance, where applicable, additional safeguards, as described in the school's/Trust's Appropriate Policy Document – Special Category Data, will be in place to protect your information.

The lawful basis for processing your personal data

- Legitimate interests: the processing is necessary for our legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the individual's personal data which overrides those legitimate interests. (This cannot apply if we are processing data to perform our official tasks.)

It is in our/our pupils, the Local Authority and the DfE's interests to understand whether the increased frequency of reporting will improve trend analysis and the provision of appropriate support, to raise attendance standards, resulting in better educational outcomes and reducing the risk of harm to children.

The additional condition for processing your special category data

- Reasons of substantial public interest (with a basis in law)
 - Equality of opportunity or treatment

Your rights

Under data protection legislation, parents and pupils have rights in relation to information about them that we hold. You have the right:

- To be informed via Privacy Notices such as this;
- To ask us for access to information about you that we hold;
- To have your personal data rectified, if it is inaccurate or incomplete;
- To request the deletion or removal of personal data to prevent processing unless we have a legal obligation to process your personal information;
- To restrict our processing of your personal data (i.e. permitting its storage but no further processing);
- To data portability. We need to be able to provide you with your personal data in a structured, commonly used, machine readable form when asked;



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- To object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics;
- Not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.

To make a request under any of your rights please refer to the 'Subject Rights Advice & Application Form'

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/792891/hmpo-data-subject-rights-request-form.docx or contact the Data Protection Officer.

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Details of transfers to third country and safeguards

Your personal and sensitive data will only be stored and processed on servers based within the United Kingdom or Ireland. This ensures data is stored in the EEA and can be freely transferred between Ireland and the UK under the current UK/EW GDPR adequacy decision.

Data Controller

Liz Easterbrook is registered as a data controller with the Information Commissioner's Office. Discovery MAT ICO reference number is: **ZA240694**.

For any concerns or enquiries, please contact: our Data Protection Officer, Liz Easterbrook in writing at Finance, Plymouth City Council, Ballard House, West Hoe Road, Plymouth, PL1 3BJ, by telephone on 01752 398380 or by email at 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/>



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