Mosaic Partnership Trust

Privacy Notice Pupils and Parents (Ref 02MPTPNB)

Policy Name	Privacy Notice Pupils and Parents
Policy Reference	02 MPT PNB
Version	V2.5
Date Created/Amended	03/11/2026
Date Approved	03/11/2026
Policy Author	Andrew Best: CEO MPT
Approved By	Management – Oversight: Audit & Risk Committee
Review Cyle	Annually
Review Date	Term 6, 2027
Trust Board Ratification	Yes

Privacy Notice (Ref 02MPTPNB)

History of most recent changes

Version	Date	Page	Change	Origin of Change
V1.0	09/04/2024	Whole Document	Adoption by the Mosaic Partnership Trust and Implementation	New Academy Trust requirement of a Privacy Notice – Pupils
V2.0	16/07/2024	Whole Document	Change supported by Judicium Education to align all privacy notices with current guidance	Communication with Judicium who the Trust use as their DPO including changes to encompass parents and pupils
V2.1	07/04/2025	Page 3 and 4	Reference to Iris Connect Platform	In conjunction with Stone King Solicitors and with the Legitimate Interests Assessment
V2.2	02/08/2025	Page 6	Updated to include new third parties	Engagement with new third parties
V2.3	07/07/2025	Page 4	Updated to include FSM eligibility check information in relation to parents	Updated guidance and criteria for Free School Meals eligibility
V2.4	28/08/2026	Page 3 and 4	Reference to Iris Connect Platform removed and replaced with StepLab as a new platform	In conjunction with Stone King Solicitors and with the Legitimate Interests Assessment
V2.5	03/11/2026	P5 P8	Updated Data Sharing Section Updated Contact Section with DPO Address	In line with DPO guidance

Privacy Notice (Ref 02MPTPNB)

Document Owner and Approval

The Mosaic Partnership Trust is the owner of this document and is responsible for ensuring that this privacy notice document is reviewed in line with Trust's policy review schedule.

Introduction

This privacy notice describes how we collect and use personal information about pupils, in accordance with the UK General Data Protection Regulation (UK GDPR), section 537A of the Education Act 1996 and section 83 of the Children Act 1989.

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

This notice applies to all pupils and parents.

Who Collects This Information?

Mosaic Partnership Trust is a "data controller." This means that we are responsible for deciding how we hold and use personal information about pupils and parents. Under data protection legislation, we are required to notify you of the information contained in this privacy notice.

This notice does not form part of any contract to provide services and we may update this notice at any time.

It is important that you read this notice with any other policies mentioned within this privacy notice, so that you are aware of how and why we are processing your information, what your rights are under data protection legislation and the procedures we take to protect your personal data.

Data Protection Principles

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

Categories of Pupil Information We Collect, Process, Hold and Share

We may collect, store and use the following categories of personal information about you:

- Personal information such as name, unique pupil number, date of birth, gender and contact information;
- Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses;
- Characteristics (such as language, and free school meal eligibility);
- Attendance details (such as sessions attended, number of absences and reasons for absence);
- Performance and assessment information;
- Behavioural information (including exclusions);
- Images of pupils engaging in school activities including through StepLab, and images captured by the School's CCTV system;
- Information about the use of our IT, communications and other systems, and other monitoring information;
- Financial details;

We may also collect, store and use the following more sensitive types of personal information:

- Information about your race or ethnicity, religious or philosophical beliefs;
- Information about your health, including any medical conditions and sickness records;

We may also collect, store and use the following more sensitive types of personal parent information:

- Special educational needs information;
- National Insurance and Date of Birth (for Free School Meals Eligibility).

Collecting this Information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. To comply with the UK General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

How We Use Your Personal Information

We hold pupil data and use it for:

- Pupil admission (and to confirm the identity of prospective pupils and their parents);
- Providing education services and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Informing decisions such as the funding of schools;
- Assessing performance of schools;
- Safeguarding pupils' welfare and providing appropriate pastoral (and where necessary medical) care;
- Support teaching, learning and assessment;
- Giving and receive information and references about past, current and prospective pupils, and to provide references to potential employers of past pupils;
- Managing internal policy and procedure;
- Enabling pupils to take part in assessments, to publish the results of Statutory Tests (including the Phonic and Multiplication checks) and to record pupil achievements;
- To carry out statistical analysis for diversity purposes;
- Legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care;
- Enabling relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate;
- Monitoring use of the school's IT and communications systems in accordance with the school's IT security policy;
- Making use of photographic images of pupils in school publications, on the school website and on social media channels;
- To support staff professional development in the platform StepLab;
- Security purposes, including CCTV; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.
- To provide support to pupils after they leave the school

Privacy Notice (Ref 02MPTPNB)

The Lawful Bases on which we use this Information

We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Consent: the individual has given clear consent to process their personal data for a specific purpose;
- Contract: the processing is necessary for a contract with the individual;
- Legal obligation: the processing is necessary to comply with the law (not including contractual obligations);
- Vital interests: the processing is necessary to protect someone's life.
- Public task: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law; and
- The Education Act 1996: for Departmental Censuses 3 times a year. More information can be found at: https://www.gov.uk/education/data-collection-and-censuses-for-schools.

We need all the categories of information in the list above primarily to allow us to comply with legal obligations. Please note that we may process information without knowledge or consent, where this is required or permitted by law.

How we use particularly sensitive personal information

Special categories of particularly sensitive personal information, such as information about your health, racial or ethnic origin, sexual orientation, or biometrics require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations in line with our data protection policy.
- Where it is needed in the public interest, such as for equal opportunities monitoring.
- Where it is necessary to protect you or another person from harm.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Sharing Data

We may need to share your data with third parties where it is necessary. There are strict controls on who can see your information. We will not share your data if you have advised us that you do not want it shared unless it's the only way we can make sure you stay safe and healthy, or we are legally required to do so.

We share pupil information with:

- the Department for Education (DfE) - on a statutory basis under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013
- Ofsted & SIAMS
- Other Schools or Provisions that pupils have attended/will attend
- NHS
- Welfare services (such as social services)

- Law enforcement officials such as police, HMRC
- Local Authority Designated Officer (LADO)
- Professional advisors such as lawyers and consultants
- Support services (including insurance, management information systems (Arbor), IT support, information security, Caterlink, CPOMS, Steplap, EY Works, Timestables Rockstars, Phonics Subscriptions, Evolve)
- Providers of learning software
- Local Authorities (Wiltshire or South Gloucestershire), including EEQU and All Together Journey
- Health and Safety provider Handsam and Wonde
- Education Data Solutions
- other schools within the Trust.

The Department for Education request regular data sharing on pupil attendance to help support those vulnerable students and to assist with intervention strategies. Further information on how the Department for Education collects this data will be made available on the school website.

Information will be provided to those agencies securely or anonymised where possible.

The recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the UK and the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Retention Periods

Except as otherwise permitted or required by applicable law or regulation, the school only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

Information about how we retain information can be found in our Data Retention policy.

Security

The school keep information about pupils on computer systems and sometimes on paper.

We have put in place measures to protect the security of your information (i.e., against it being accidentally lost, used, or accessed in an unauthorised way).

The National Pupil Database

The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in an electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013.

To find out more about the NPD, go to https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information.

The department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data?
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit: https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

For information about which organisations the department has provided pupil information, please visit the following website: https://www.gov.uk/government/publications/national-pupil-database-requests-received

To contact DfE: https://www.gov.uk/contact-dfe

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's education record, contact Karen Llewellyn, Governance Clerking Professional. Email: Karen Llewellyn3 Karen.Llewellyn@mosaicpt.org.uk

Requesting Access to your Personal Data

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

If you want to request information, please see our Subject Access Request policy for the procedures we take.

Use of Smart Glasses and Wearable Recording Devices

To protect the safety, privacy, and wellbeing of pupils, staff, visitors, and volunteers, the use of smart glasses or any wearable device capable of recording, transmitting, storing, or capturing images, video, audio, or other data is prohibited on Trust and school premises, during educational activities, and at any Trust-sponsored event unless expressly authorised by the Headteacher or Chief Executive Officer for a specific operational purpose.

This prohibition applies to all pupils, staff, contractors, volunteers, governors, trustees, visitors, and third parties.

Any unauthorised use of smart glasses or wearable recording devices may be treated as a safeguarding, data protection, and/or disciplinary matter and may result in the device being

removed from use, further investigation, and appropriate action in accordance with Trust policies, including safeguarding, acceptable use, staff conduct, behaviour, and data protection policies.

The Trust reserves the right to require individuals to remove or cease using such devices where there is a concern that their use may compromise safeguarding, confidentiality, privacy, or the effective operation of the school.

Exceptions: Reasonable adjustments for individuals with disabilities or medical needs will be considered on a case-by-case basis, subject to appropriate risk assessment and safeguards being implemented. This is subject to the approval of the Headteacher, CEO and the Strategic Lead for Inclusion and SEND.

Right to Withdraw Consent

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Karen Llewellyn. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Contact

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with Karen Llewellyn in the first instance (karen.llewellyn@mosaicpt.org.uk) We will acknowledge your complaint within 30 calendar days, and we will investigate and respond without undue delay. Further information about the way we handle data protection complaints can be found in our Data Protection Policy, available on the trust website – www.mosaicpt.org.uk

For routine HR or employment queries, please contact your Academy HR lead or the Trust HR team.

We have appointed a Data Protection Officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by Karen Llewellyn, then you can contact the DPO on the details below: -

Data Protection Officer:	Judicium Consulting Limited
Address:	5th Floor, 98 Theobalds Road, London, WC1X 8WB
Email:	dataservices@judicium.com
Web:	www.judiciumeducation.co.uk

Should you remain dissatisfied with our response, you also have the right to make a complaint to the Information Commission's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.