

General Data Protection Regulation (UK GDPR) and Data Protection Act 2018

Privacy Notice for Students and their Families



Who processes your information?

Winterhill School is part of Inspire Learning Trust (known as the Trust for this policy), which also includes Sitwell Junior School, Thomas Rotherham College and Oakwood High School. The Trust is the data controller of the personal information you provide to us. This means the Trust determines the purposes for which, and the manner in which, any personal data relating to students and their families is to be processed. This Privacy Notice covers both the Trust and Winterhill School.

The Exams/data manager, on behalf of the Trust acts as a representative for Winterhill School with regard to its data controller responsibilities for students and their families; they can be contacted on 01709 740232 or via email at admin@winterhill.org.uk

Mr D Naisbitt, CEO, Inspire Learning Trust is the Data Protection Officer for the Trust with regard to its data controller responsibilities; he can be contacted on 01709 300600 or via email at dpo@inspiretrust.uk

Data Protection Enquiries for the Individual academies should be directed as follows:

Dr Andrew Reeder, Headteacher, Winterhill School - admin@winterhill.org.uk

Mr P Storey, Headteacher, Oakwood High School - info@oakwood.ac

Mrs J Dawson, Headteacher, Sitwell Junior School – info@sitwelljunior.uk

Mr C Walls, Assistant Principal, Thomas Rotherham College – trcinfo@trc.ac.uk

The Trust employs the services of an external advisor Mr Tim Pinto who can be contacted via the school. Mr Pinto's role is to oversee and monitor the school's data protection procedures, and to ensure they are compliant with the UK GDPR and Data Protection Act 2018.

In some cases, your data will be outsourced to a third-party processor; however, this will only be done with your consent, unless the law requires the school to share your data. Where the school outsources data to a third-party processor, the same data protection standards that Inspire Learning Trust upholds are imposed on the processor.

Why do we collect and use your information?

Inspire Learning Trust holds the legal right to collect and use personal data relating to students and their families, and we may also receive information regarding them from their previous school,

Local Authority and/or the Department for Education. We collect and use personal data in order to meet legal obligations and public tasks under the UK GDPR, the Data Protection Act 2018 and education legislation including those in relation to the following:

- Article 6 and Article 9 of the GDPR
- Education Act 1996 (including duties under section 507B)
- Regulation 5 of The Education (Information About Individual Students) (England) Regulations 2013

In accordance with the above, the personal data of students and their families is collected and used for the following reasons:

- identification and security purposes
- to support student learning
- to monitor and report on student progress
- to provide appropriate pastoral care
- to assess the quality of our service
- to comply with the law regarding data sharing
- to Safeguard the health and wellbeing of students (including contacting the stated emergency contact person/s)
- to celebrate student achievement

Student personal data is held in systems which have appropriate technical and organisational measures in place to protect personal data and meet applicable data protection requirements.

- Go4Schools Hyperspheric Solutions (Student Educational and Personal Data) including messaging (Student Educational and Personal Data and messaging)
- Wonde (Student Educational and Personal Data)
- Bromcom (Student Educational and Personal Data)
- IntraHealthcare (NHS Vaccinations)
- TimeTabler
- Asset solutions (Virtual School/LAC)
- Iris School Extractor (Virtual School/LAC)
- Heppsy (Student Personal Data)
- Exam Boards (OCR, AQA, Pearson & WJEC)
- Library System (Heritage Cirqa Hosting) / I.S.Oxford Ltd
- Twinkl (Student Educational and Personal Data)
- Dr Frost (Student Educational and Personal Data)
- GL Assessment (Student Educational Personal Data)
- Art photography (Student Personal Data)
- CPOMS (Child Protection Records)
- Cunninghams cashless catering system (School Meals)
- Google (curriculum and student related information)
- ParentPay (payment system for parents and students for school trips, meals etc)
- Password protected network drives and email
- Evolve Educational Visits (Student personal data)
- Compass plus (Student Educational and Personal Data)
- Parents Evening Booking System – School Cloud
- TES Provision Maps (Student Educational & Personal Data)

- CCTV is in operation on each site and is hosted internally.
- SENECA Learning
- Springpod (Online virtual work experience)

Failure to provide personal data

The Trust does not need to secure your consent for the collection of your child's personal data as there is a legitimate need for collection (as outlined above). However, the Trust has a duty to inform you of what types of data are retained, for how long and wherever possible to provide you secure access to your own data. You can decline to provide your data, however, if a student (or their parent / carer) fails to provide their personal data, there may be significant consequences. The school may be unable to:

- contact or report to the next of kin
- safeguard a student
- administer first aid
- produce care plans for students with medical needs
- provide a timetable for the student within the correct teaching groups to give them the best opportunity to learn and improve
- offer additional intervention to the student, including provision of Special Educational Need and English as an Additional Language support and other appropriate support
- assess the student and report on progress and attainment
- enter the student for formal examinations
- provide or maintain a place at the school for the student
- provide school meals
- provide references
- provide careers guidance
- take a student on school trips or arrange a placement

Which data is collected?

The personal data the school collects, holds and shares include the following:

- personal information; names, student telephone numbers, addresses, email, school photo, date of birth, parent / carer name address and contact details, emergency contact details, Biometrics (for cashless catering), links to siblings
- characteristics; gender, ethnicity, home language, nationality, country of birth, religion and free school meal eligibility
- Looked After Child (LAC) data
- educational history
- timetable and attendance data
- student work and assessment data
- medical and first aid data (including specific dietary requirements)
- Special Educational Needs and Disability data
- care Plans
- behavioural information, including incidents involving the student
- safeguarding data (including accidents)
- examination data

- school trip permissions (via consent)
- permissions for student photo or image for publicity (via consent)

Biometric Information

Winterhill School operates a cashless catering system which may use biometric information to enable students to access catering services. Biometric information is processed with additional safeguards due to its sensitive nature. The school will only process a student's biometric information where the appropriate written consent has been obtained from a parent or carer in accordance with the Protection of Freedoms Act 2012. Students also have the right to refuse the use of their biometric information or request that it is no longer used, regardless of whether parental consent has been provided. Participation in the biometric system is entirely voluntary. Students who do not participate, or whose parents/carers do not provide consent, will be provided with an alternative method of identification to access catering services. Students will not be disadvantaged if they choose not to use the biometric system. The school does not store images of fingerprints. Instead, the biometric system converts the fingerprint into an encrypted numerical template which cannot be used to recreate the original fingerprint image. Biometric information is used solely for the purpose of operating the school's cashless catering system and will not be used for any other purpose. Access to this information is restricted to authorised personnel and approved service providers who require it to provide and support the service. Parents, carers and students may withdraw their consent at any time by contacting the school. Where consent is withdrawn, the biometric information will be securely deleted and an alternative method of identification will be provided. The processing of biometric information is carried out in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Protection of Freedoms Act 2012.

Whilst the majority of the personal data you provide to the school is mandatory, some is provided on a voluntary basis. When collecting data, the school will inform you whether you are required to provide this data or if your consent is needed. Where consent is required, the school will provide you with specific information with regards to the reasons the data is being collected and how the data will be used.

Where you have given consent, please note Facebook, X (formally known as Twitter) and Instagram are all third-party platforms. Winterhill School cannot be held responsible for the data and privacy policies or practices of the social media platforms we upload content to that features your child's image. You can find more information about these platforms' privacy and data policies on their respective websites.

How long is your data stored for?

Personal data relating to students at Winterhill School and their families is stored in line with the school's Records Management Schedule. In accordance with the UK GDPR and Data Protection Act 2018 the school does not store personal data indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected or in line with legal or regulatory requirements.

Will my information be shared?

The Trust is required to share students' data with the Department for Education (DfE) on a statutory basis, we do not need consent for this, this includes the following:

- attainment and examination results
- attendance, absence, exclusions
- student characteristics
- performance
- Special Educational Need.

The National Student Database (NPD) is managed by the DfE and contains information about students in schools in England. The Trust and therefore, Winterhill School, are required by law to provide information about students to the DfE as part of statutory data collections; some of this information is then stored in the NPD. The DfE may share information about our students from the NDP with third parties who promote the education or wellbeing of children in England by:

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

The DfE has robust processes in place to ensure the confidentiality of any data shared from the NDP is maintained.

In the provision of education to students, we have a legal basis to routinely share students' information with:

- other schools and post 16 providers of choice to support educational provision
- the local authority
- the Department for Education
- the National Health Service
- the police
- examination boards.

The information that we share with these parties includes the following:

- personal details including contact information
- attendance, absence, exclusions and behaviour
- assessment and attainment and examination results
- medical
- SEND
- student transfer between schools and post 16 providers.

Once our students reach the age of 13, we are required by law, Education Act 1996 (section 507B) to pass on certain information to our Local Authority or local providers of youth support services who are responsible for the education or training of 13- to 19-year-olds. We may also share specific personal data of students who are aged 16 and over with post-16 education and training providers, in order to secure appropriate services for them. The information provided includes names,

addresses and dates of birth of students and any information necessary to support the services, e.g., Assessment data, school name, ethnicity or gender. The providers include:

- Local authority services
- Early Help
- National Apprenticeship Service
- Post 16 providers.

Parents are able to request that only their child's name, address and date of birth are passed to the Local Authority or local providers of youth support services by informing Winterhill School via the parental log in to the GO4Schools system. GO4Schools is the system that provides parents with access to their child's educational records and data. Once students reach 16 years of age, this right is transferred to them, rather than their parents. For more information regarding services for young people, please visit the LA's website: www.rmhc.gov.uk.

Safeguarding

Please note, we do not need parental consent to share information which we deem appropriate to safeguard or support children and their families. This right is provided by the Statutory guidance for schools and colleges in 'Keeping Children Safe in Education'. This privacy notice is informing you that for the purposes of safeguarding, information may be requested by and shared with a range of services and agencies who work with us to support and protect children and their families. These include:

- The police
- The local authority, including Social Care, Early Help and other such services
- 0-19 Health Service
- Other agencies as part of the multi-agency approach as set out in Working Together to Safeguard Children
- Other schools, colleges and education services provider

What are your rights?

Parents and students have the following rights in relation to the processing of their personal data:

- be informed about how the Trust and Winterhill School uses your personal data (and this notice informs you of that)
- request access to the personal data that Winterhill School holds (where access is not already provided)
- request that your personal data is amended if it is inaccurate or incomplete
- request that your personal data is erased where there is no compelling reason for its continued processing
- request that the processing of your data is restricted
- object to your personal data being processed

Where the processing of your data is based on your consent, you have the right to withdraw this consent at any time.

If you have a concern about the way the Trust or Winterhill School is collecting or using your personal data, you can raise a concern with the Head of School; Dr Reeder on 01709 740232.

You can also raise a concern with the Information Commissioner's Office (ICO) on 0303 123 1113, Monday-Friday 9am-5pm.

The Trust reserves the right to update as and when required and will post updates on our school websites.

Where can you find out more information?

If you would like to find out more information about how the Trust use and store your personal data, please visit our website www.inspirelearningtrust.uk

Policy Review Frequency	Annual
Policy to be approved by	Sam Green
Date of Review	July 2026
Key Updates at latest review	Additional systems and changes to language around use of biometrics
Approved by Chair	
Next Review	July 2027
Lead Professional / External Review	
Communication	Policy Acceptance via HR System
Document Location	Policy Acceptance, Every Compliance System
PA/HR Officer	Julie Parkin