

# INVICTUS

Education Trust

## Privacy Notice

Invictus Education Trust respects your rights to confidentiality and privacy and is committed to compliance with the General Data Protection Regulation. This notice explains what personal data (information) we hold, how we collect it, how we use it and how we may share information with others.

### Who are we?

Invictus Education Trust, uses and is responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws.

Our Data Protection Officer is Mrs Julie Duern who can be contacted at the following:

Mrs Julie Duern  
Data Protection Officer  
Invictus Education Trust  
Ward House  
Himley Park  
Himley Road  
Dudley  
DY3 4DF  
Email: [jduern@invictus.education](mailto:jduern@invictus.education)

In some cases, your data will be outsourced to a third-party processor; however, this will only be done with your consent, unless the Trust have another legal basis to share your data. Where the Trust outsources data to a third-party processor, the same data protection standards that Invictus Education Trust upholds are imposed on the processor.

### Why do we collect and use your information?

Invictus Education 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, LA and/or the DfE. We collect and use personal data in order to meet legal requirements and legitimate interests set out in the GDPR and UK law, including those in relation to the following:

- Article 6 and Article 9 of the GDPR;
- Children Act 1989;
- Education Act 1996; and
- Regulation 5 of the Education (Information about Individual Students) (England) Regulations 2013.

Information about an individual collected by Invictus Education Trust will only be used for the purpose for which it is was provided. Personal information collected by Invictus Education Trust will be processed and stored securely by Invictus Education Trust and will be kept to a minimum. Information will only be retained for as long as is necessary to provide the requested service, following which the information will be disposed of securely.

If we need to collect special category (sensitive) personal information, we rely upon reasons of substantial public interest (equality of opportunity or treatment). If there is processing or sharing that relies on your consent, we will make this clear to you and ensure we seek your consent.

For more information about our collection and processing of information, please read our Data Protection Policy, available on Trust and School Websites

## **Information on Students**

When a Students joins Invictus Education Trust, we use personal information that we gather in relation to the Student for various purposes. Information that we hold in relation to the student is known as “personal data”. This will include data that we obtain from the student directly and data about the student which we obtain from other people and organisations. We might also need to continue to hold a student’s personal data for a period of time after they have left the school. Anything that we do with your personal data is known as “processing”.

### **What information do we use about students?**

- Personal information (such as name, unique student number, addresses, telephone and email contact details, date of birth, language, nationality, country of birth, photographs, video and CCTV images and free school meal eligibility).
- Attendance information (such as sessions attended, number of absences and absence reasons).
- Behavioural information (such as behaviour reports and exclusion information).
- Assessment information (such as National curriculum assessment results).
- Education details (such as details of previous/future schools).

We may also collect, hold, share and otherwise use some information about Students which is “special category personal data” and we will take extra care to make sure that this is kept safe:

- Racial or ethnic origin;
- Religious beliefs;
- Special educational needs and disability information;
- Medical / health information;
- Genetic and biometric data;
- Information relating to keeping students safe;
- Sexual life;
- Sexual orientation; and
- Dietary requirements.

### **Where do we get this information from?**

We get this information from:

- The student;
- The [parents/guardians/carers], and other children’s [parents/guardians/carers];
- Our staff;

- Previous schools or education providers; and
- People from other organisations, including doctors or the local authority for example.

### **Why do we use this information?**

We use this information for lots of reasons, including:

- To make sure that we give you a good education and to support students;
- To make sure that we are able to address and support any educational, health or social needs students may have;
- To make sure everyone is treated fairly and equally;
- To keep students and everyone at the school safe and secure;
- To deal with emergencies involving Students;
- To celebrate students achievements;
- To support you to decide what to do after you leave school;
- To support the primary, secondary and in-year admissions process;
- To provide reports and additional information to your parents/carers;
- To improve the education and services we provide;
- To promote the Trust and to document the work and history of the Trust.

Some of these things we have to do by law. Other things we do because we need to so that we can run the Trust schools.

Sometimes we need permission to use student information. This includes taking pictures or videos of students to be used on our website or in the newspaper. Before we do these things, we will ask students or if necessary students parent/carer for permission.

### **Why do we use special category personal data?**

We may need to use the information about students which is special (mentioned above) where there is a specific interest to do so for example health and social care purposes or to provide you with equal opportunities and treatment. We will also use this information where students have given us permission to do so.

There may also be circumstances where we need to use student information in relation to legal claims, or to protect a student's vital interests and where students are unable to provide their consent.

### **How long will we hold information in relation to our students?**

We will hold information relating to you only for as long as necessary. How long we need to hold on to any information will depend on the type of information based on the Trust's Data Retention and Erasure Policy, available from Trust/School websites

### **Who will we share student information with?**

We may be share information about students with:

- Department for Education and the Education and Skills Funding Agency in compliance with legal obligations of the school to provide information about students and parents as part of statutory data collections;
- Local Authority (including Dudley and South Staffordshire) teams working to improve outcomes for children and young people;
- Commissioned providers of Trust services (such as Local Authority or Trust services);

- Schools or colleges that you attend after leaving us;
- Local forums with schools and Local Authority representatives which support in-year fair access processes and support managed moves between schools;
- Local multi-agency forums which provide SEND advice, support and guidance (such as Local Inclusion Forum Team);
- Subsidiaries and data processors, where necessary to provide essential systems and services required to ensure children continue to receive appropriate education provision, under contract to the Trust;
- Other public organisations, where necessary, which may include Police, School Nurses, Doctors and Mental Health workers and the NHS;
- Schools within our Trust, and local collaboration to enable the moderation of student assessment outcomes, to support collaborative working through joint analysis, and ensure children continue to receive appropriate education provision;
- External moderators (teachers with recent relevant experience) of end of key stage assessments, to meet statutory requirements from the Standards & Testing Agency (STA);
- Third-party providers of information services (such as education content providers or apps); and
- Contracted providers of services (such as communication systems, school photographers and catering providers).

Additionally, sometimes we need to share information to others, based on the type of study:

**Aged 14+ qualifications** – If you enrol for post-14 qualifications, the Learning Records Service will give us a student’s unique learner number (ULN) for you and may also give us details about your previous study or qualifications;

**Students aged 16+** – We are required to additional student information to Local Authority to fulfil their responsibilities in relation to the education or training of 13-19-year olds under section 507B of the Education Act 1996, including:

- Intended destinations of students in Year 11 moving into Year 12;
- Course offers for students in Year 11 moving into Year 12 (September Guarantee);
- Careers advice and guidance; and
- Youth support services.

## **Information for Parents/Carers**

As a parent or carer of a student within Invictus Education Trust, during your child’s time with us, we will gather and use information relating to you. Information that we hold in relation to individuals is known as their “personal data”. This will include data that we obtain from you directly and data about you that we obtain from other people and organisations. We might also need to continue to hold your personal data for a period of time after your child has left Invictus Education Trust. Anything that we do with an individual’s personal data is known as “processing”.

### **What information do we process in relation to you?**

We may collect, hold, share and otherwise use the following information about you:

- Personal information (such as name, address, home and mobile numbers, personal email address, emergency contact details and relationship marital status).

- Financial details (such as bank account or credit card details), and other financial details such as eligibility for free school meals or other financial assistance.
- CCTV footage and images obtained when you attend one of our locations or sites.
- Your relationship to your child, including any Court orders that may be in place.

We may also collect, hold, share and otherwise use some information about you which is special “special category personal data”, including:

- gender;
- age;
- ethnic group;
- sex or sexual orientation;
- religious or similar beliefs;
- information about health; and genetic information

### **Where do we get your personal data from?**

We will obtain an amount of your personal data from you, by way of information gathering exercises at appropriate times such as when your child joins Invictus Education Trust, and when you attend Invictus Education Trust, site and are captured by our CCTV system.

We may also obtain information about you from other sources. This might include information from the local authorities or other professionals or bodies, including a Court, which might raise concerns in relation to your child.

### **Why do we use your personal data?**

We will process your personal data for the following reasons:

- Where we are required by law, including:
- To provide reports and other information required by law in relation to the performance of your child;
- To raise or address any concerns about safeguarding;
- To the Government agencies including the police;
- To obtain relevant funding for the school; and
- To provide or obtain additional services including advice and/or support for your family.
- Where the law otherwise allows us to process the personal data as part of our functions as a Invictus Education Trust, or we are carrying out a task in the public interest, including:
- To confirm your identity;
- To communicate matters relating to Invictus Education Trust to you;
- To safeguard you, our students and other individuals;
- To enable payments to be made by you to Invictus Education Trust;
- To ensure the safety of individuals on within the sites and premises of Invictus Education Trust;
- To aid in the prevention and detection of crime on Invictus Education Trust site; and
- To conduct research about your opinion of current services, improve our services or of potential new services that may be offered.
- Where we otherwise have your consent

Whilst the majority of processing of personal data we hold about you will not require your consent, we will inform you if your consent is required and seek that consent before any processing takes place.

### **Why do we use special category personal data?**

We may process special category personal data in relation to you for the following reasons:

- Where the processing is necessary for reasons of substantial public interest, including for purposes of equality of opportunity and treatment, where this is in accordance with our Data Protection Policy;
- Where the processing is necessary in order to ensure your health and safety on Invictus Education Trust site, including making reasonable adjustments for any disabilities you may have; and
- Where we otherwise have your explicit written consent.

There may also be circumstances where we need to use your information in relation to legal claims, or to protect your vital interests of those of your child, and where it is not possible to seek your consent.

### **Failure to provide this information**

If you fail to provide information to us we may be prevented from complying with our legal obligations.

### **How long will we hold your personal data for?**

We will hold information relating to you only for as long as necessary. How long we need to hold on to any information will depend on the type of information based on the Trust's Data Retention and Erasure Policy, available from Trust and School websites.

### **Who will we share your personal data with?**

We routinely share information about you with:

- Department for Education and the Education and Skills Funding Agency in compliance with legal obligations of the school to provide information about students and parents as part of statutory data collections;
- Local Authority (including Dudley and South Staffordshire) teams working to improve outcomes for children and young people;
- Commissioned providers of Trust services (such as Local Authority or Trust services);
- Future schools or colleges your child attends after leaving us;
- Local forums with schools and Local Authority representatives which support in-year fair access processes and support managed moves between schools;
- Local multi-agency forums which provide SEND advice, support and guidance (such as Local Inclusion Forum Team (LIFT));
- Subsidiaries and data processors, where necessary to provide essential systems and services required to ensure children continue to receive appropriate education provision, under contract to the Trust;
- Other public organisations, where necessary, which may include Police, School Nurses, Doctors and Mental Health workers and the NHS;
- Third-party providers of information services (such as payment processing providers to enable payments); and

- Contracted providers of services (such as communication systems, school photographers and catering providers);

The Department for Education may share information that we are required to provide to them with other organisations. For further information about the Department's data sharing process, please visit: <https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>.

Contact details for the Department can be found at <https://www.gov.uk/contact-dfe>.

Local authorities may share information that we are required to provide to them with other organisations.

## **Information for our Workforce**

When you work at Invictus Education Trust, we will use information that we gather in relation to them for various purposes. Information that we hold in relation to individuals is known as their "personal data". This will include data that we obtain from the individual directly and data about the individual that we obtain from other people and organisations. We might also need to continue to hold an individual's personal data for a period of time after they have left the school. Anything that we do with an individual's personal data is known as "processing".

### **What information do we process in relation to our workforce?**

We will collect, hold, share or otherwise use the following information about our workforce:

- Personal information (such as name, address, home and mobile numbers, personal email address, employee or teacher number, national insurance number, and emergency contact details).
- Contract information (such as start dates, hours worked, post, roles and salary information, bank/building society details).
- Work absence information (such as number of absences and reasons (including information regarding physical and/or mental health), holiday records).
- Qualifications / training courses attended and, where relevant, subjects taught (such as training record).
- Performance information (such as appraisals and performance reviews, performance measures including performance management/improvement plans, disciplinary or grievance records).
- Other information (such as pension arrangements (and all information included in these necessary to administer them), time and attendance records, information in applications made for other posts within the school, criminal records information (including the results of Disclosure and Barring Service (DBS) checks), details in references the school receives or provides to other organisations, CCTV footage and images).
- Photographic and video images.

We may also collect, hold, share and otherwise use some information about you which is special "special category personal data", including:

- gender;
- age;
- ethnic group;

- religious or similar beliefs;
- trade union membership;
- information about health; and
- genetic information and biometric data.

### **Where do we get information from about our workforce?**

Whilst the majority of the personal data you provide to the Trust is mandatory, some is provided on a voluntary basis. When collecting data, the Trust will inform you whether you are required to provide this data or if your consent is needed.

However, we may also obtain information from tax and regulatory authorities such as HMRC, previous employers, your trade union, the DBS, our insurance benefit administrators, consultants and other professionals we may engage, recruitment or vetting agencies, other members of staff, students or their parents, and publicly available resources including online sources. In addition, we may obtain information from automated monitoring of our websites and other technical systems such as our computer networks and systems, CCTV and access control systems, communications systems, remote access systems, email and instant messaging systems, intranet and internet facilities, telephones, voicemail and mobile phone records.

### **Why do we use this information?**

We will process the personal data of our workforce for the following reasons:

- Where we are required by law, including:
  - To comply with the law regarding data sharing;
  - To comply with specific employment law requirements, including our obligations as an employer under employment protection and health and safety legislation, and under statutory codes of practice such as those issued by ACAS; and
  - To comply with legal requirements in relation to equalities and non-discrimination.
- Where we are required by any contract with our workforce, such as employment contracts, including:
  - To make payments to our workforce, such as salary payments;
  - To deduct tax and National Insurance contributions;
  - To make a decision about recruitment; and
  - To check individuals are legally entitled to work in the UK.
- Administering employment contracts;
- Conducting performance reviews;
- Making decisions about salary and compensation;
- Liaising with pension providers;
- Where the law otherwise allows us to process the personal data, or we are carrying out a task in the public interest, including:
  - To enable the development of a comprehensive picture of the workforce and how it is deployed;
  - To inform the development of recruitment and retention policies;
  - To safeguard our students and other individuals;
  - To ensure safe working practices; and
  - In the interests of ensuring equal opportunities and treatment.

- To conduct research about your opinion of current services, improve our services or of potential new services that may be offered;
- Where we otherwise have the consent of the individual;
- To promote the work of the Trust;
- To document the work and history of the Trust

The majority of processing of personal data for our workforce does not require consent, however, we will inform individuals if their consent is required and seek that consent before any processing takes place.

### **Why do we use special category personal data?**

We may process special category personal data of our workforce for the following reasons:

- To carry out our legal obligations in relation to employment law, where this is in accordance with our Data Protection Policy;
- Where the processing is necessary for reasons of substantial public interest, including for purposes of equality of opportunity and treatment, where this is in accordance with our Data Protection Policy;
- For the purposes of preventative or occupational medicine in order to assess an individual's working capacity and/ or the need for reasonable adjustments; and
- Where we otherwise have an individual's explicit written consent – subject to the restriction set out above on the use of consent in an employment relationship.

There may also be circumstances where we need to use your information in relation to legal claims, or to protect your vital interests and where you are unable to provide your consent.

### **Failure to provide this information**

If our workforce fails to provide information to us then this may result in us being unable to perform the employment contract, or we may be prevented from complying with our legal obligations.

### **How long will we hold information in relation to our workforce?**

We will hold information relating to you only for as long as necessary. How long we need to hold on to any information will depend on the type of information based on the Trust's Data Retention and Erasure Policy, available from the Trust and School websites

Who we share workforce personal information with?

- Department for Education (DfE) on a statutory basis for workforce policy monitoring, evaluation, and links to school funding / expenditure and the assessment educational attainment;
- Commissioned providers of Trust services (such as Local Authority or Trust services);
- Professional advisors including legal, human resources, health and safety, and communications consultants;
- Subsidiaries and data processors, where necessary to provide essential systems and services required to ensure children continue to receive appropriate education provision, under contract to the Trust;
- Other public organisations, where necessary, which may include Police, Doctors, Occupational Health, NHS

- Schools within our Trust, and local collaboration to enable the moderation of student assessment outcomes, to support collaborative working through joint analysis, and ensure children continue to receive appropriate education provision;
- Third-party providers of information services (such as payroll, online application and human resource systems); and
- Contracted providers of services (such as school photographers and catering providers).

The Department for Education may share information that we are required to provide to them with other organisations. For further information about the Department's data sharing process, please visit: <https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>.

Contact details for the Department can be found at <https://www.gov.uk/contact-dfe>.

## **Information for Applicants applying for a job**

As part of your application to join Invictus Education Trust, we will gather and use information relating to you. Information that we hold in relation to individuals is known as their "personal data". This will include data that we obtain from you directly and data about you that we obtain from other people and organisations. We might also need to continue to hold an individual's personal data for a period of time after the recruitment process, even if you are unsuccessful. Anything that we do with an individual's personal data is known as "processing".

### **What information do we process during your application process?**

We may collect, hold, share and otherwise use the following information about you during your application process.

Up to and including shortlisting stage:

- Your name and contact details (i.e. address, home and mobile phone numbers, email address);
- Details of your qualifications, training, experience, duties, employment history (including job titles, salary, relevant dates and working hours), details of driving licence (if relevant for role), membership of professional bodies and interests;
- Your racial or ethnic origin;
- Information regarding your criminal record;
- Details of your referees;
- Whether you are related to any member of our workforce; and;
- Details of any support or assistance you may need to assist you at the interview because of a disability.

Following shortlisting stage, and prior to making a final decision

- Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers\*;
- Confirmation of your academic and professional qualifications (including seeing a copy of certificates)\*;
- Confirmation via the DBS process, regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs), whether you are barred from working in regulated activity\*;

- Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information\*;
- Medical check to indicate fitness to work\*;
- A copy of your driving licence (or other appropriate documentation as listed on the Home Office list)\*;
- If you are a teacher, we will check the National College of Teaching and Leadership (“NCTL”) Teachers Services about your teacher status, whether you are subject to a prohibition from teaching order and any other relevant checks (for example Section 128 direction for management posts and EEA teacher sanctions)\*; and
- Equal opportunities’ monitoring data.

You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked (\*) above to us to enable us to verify your right to work and suitability for the position. Without providing us with this information, or if the information is not satisfactory, then we will not be able to proceed with any offer of employment.

If you are employed by us, the information we collect may be included on our Single Central Record.

#### **Where do we get information from about during your application process?**

Depending on the position that you have applied for, we may collect this information from you, your referees (details of whom you will have provided), your education provider, any relevant professional body, the Disclosure and Barring Service (DBS), NCTL and the Home Office, during the recruitment process.

#### **Why do we use this information?**

We will process your personal data during your application process for the purpose of complying with legal obligations, carrying out tasks which are in the public interest, and taking steps with a view to entering into an employment contract with you. This includes:

- to assess your suitability for the role you are applying for;
- to take steps to enter into a contract with you;
- to check that you are eligible to work in the United Kingdom or that you are not prohibited from teaching; and
- so that we are able to monitor applications for posts in the Trust to ensure that we are fulfilling our obligations under the public-sector equality duty under the Equality Act 2010.

#### **How long will we hold information in relation to your application?**

We will hold information relating to your application only for as long as necessary. If you are successful then how long we need to hold on to any information will depend on type of information. For further detail please see our Data Retention and Erasure Policy which is available on the Trust and School websites.

If you are unsuccessful we will hold your personal data only for six months, after which time it is securely deleted.

#### **Who will we share information with about your application?**

We will not share information gathered during your application process with third parties, other than professional advisors such as legal, human resources, occupational advisors.

## **Information for Visitors, Guests and Online Services Users**

When you visit one of our locations, or schools, and/or use our online services we may need gather and use information relating to you. Information that we hold in relation to individuals is known as their “personal data”. This will include data that we obtain from you directly and data about you that we obtain from other people and organisations. We might also need to continue to hold an individual’s personal data for a period of time after the visit, or sessions has ended. Anything that we do with an individual’s personal data is known as “processing”.

### **What information do we process in relation to you?**

We will collect, hold, share and otherwise use the following information about you:

- Personal information (such as name, address, home and mobile numbers, personal email address, IP addresses)
- Anonymous demographic information (such as browser type, domain names, access times, device information, geographic location, referring web site addresses and accessed web addresses);
- Financial details (such as bank account or credit card details), and other financial details;
- CCTV footage and images obtained when you attend one of our locations or sites; and
- Your relationship to a child, or member of our workforce.

### **Where do we get your personal data from?**

We will obtain an amount of your personal data from you when you visit our one of our locations or sites through the sign-in and safeguarding procedures and when you are captured by our CCTV system.

If you place a telephone call to Invictus Education Trust then we will obtain your telephone number and through the call any personal data you provide.

We may also obtain information about you our websites, online services and communication systems, including personal data supplied by your computer, user account(s), and other information provided by you through the process of using the systems and services.

### **Why do we use your personal data?**

We will process your personal data for the following reasons:

- Where we are required by law, including:
  - To provide reports and other information required by law;
  - To raise or address any concerns about safeguarding; and
  - To ensure network and information security.
- Where the law otherwise allows us to process the personal data as part of our functions as a Invictus Education Trust, or we are carrying out a task in the public interest, including:
  - To confirm your identity;
  - To respond to requests or communications;
  - To communicate matters relating to Invictus Education Trust to you; and
  - To safeguard you, our students and other individuals.
- To enable payments to be made by you to Invictus Education Trust;
- To ensure the safety of individuals on within the sites and premises of Invictus Education Trust;

- To aid in the prevention and detection of crime on Invictus Education Trust site;
- To allow you to access protected content;
- To conduct research about your opinion of current services, improve our services or of potential new services that may be offered; and
- Where we otherwise have your consent.

Whilst the majority of processing of personal data we hold about you will not require your consent, we will inform you if your consent is required and seek that consent before any processing takes place.

### **How long will we hold your personal data for?**

We will hold information relating to you only for as long as necessary. How long we need to hold on to any information will depend on the type of information based on the Trust's Data Retention and Erasure Policy, available from Trust and School websites

### **Who will we share your personal data with?**

We routinely share information about you with:

- Commissioned providers of Trust services (such as Local Authority or Trust services);
- Subsidiaries and data processors, where necessary to provide essential systems and services required to ensure children continue to receive appropriate education provision, under contract to the Trust;
- Other public organisations, where necessary, which may include Police, school nurses, doctors and mental health workers and the NHS;
- Third-party providers of information services (such as payment processing providers to enable payments); and
- Contracted providers of services (such as communication systems, school photographers and catering providers).

### **Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### **Requesting access to your personal data**

We will not disclose information without their consent unless the law and our policies allow us to do so. We may need to disclose information where there is a legitimate reason for disclosure (such as a court order) but we will ensure that we always comply with the General Data Protection Regulation. Any information about you that we pass to a third party will be held securely by that party, in accordance with the General Data Protection Regulation, and used only to provide services or information you have requested.

Under the General Data Protection Regulation, you have rights which you can exercise free of charge which allow you to:

- Know what we are doing with your information and why we are doing it;
- Ask to see what information we hold about you (Subject Access Requests);
- Ask us to correct any mistakes in the information we hold about you;
- Object to direct marketing;
- Make a complaint to the Information Commissioners Office; and
- Withdraw consent (if applicable).

Depending on our reason for using your information you may also be entitled to:

- Ask us to delete information we hold about you;
- Have your information transferred electronically to yourself or to another organisation;
- Object to decisions being made that significantly affect you;
- Object to how we are using your information;
- Stop us using your information in certain ways; and
- Ask us to correct data we hold have about you.

To make a request for your personal information, see our Subject Data Request Policy which is available on Trust and School websites.

We will always seek to comply with your request however we may be required to hold or use your information to comply with legal duties. Please note: your request may delay or prevent us delivering a service to you.

For further information about your rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioners Office (ICO) on individuals' rights under the General Data Protection Regulation. If you have a concern about the way Invictus Education Trust and/or the DfE is collecting or using your personal data, you can raise a concern with the Information Commissioner's Office who may also be able to help at <https://ico.org.uk/concerns/>.

## **Further information about Department of Education (DfE) Use**

The DfE collects and processes personal data relating to those employed by schools (including Multi Academy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Student Referral Units and Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005.

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

The department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

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

The department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal 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 securely store and handle the data.

To be granted access to school workforce information, organisations must comply with its 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>

To contact the department: <https://www.gov.uk/contact-dfe>

## **The National Student Database (NPD)**

The NPD is owned and managed by the DfE and contains information about students in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the DfE. It is held in 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 students 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 Students) (England) Regulations 2013.

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

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

The DfE 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 student 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.

## **Changes to our privacy policy**

Invictus Education Trust keeps the use of personal data under review. This page was last updated on 18<sup>st</sup> May 2018.