Privacy Notice for Parents/Carers and Pupils
How we use your information

2026/2027

Who are we?
Castle Phoenix Trust is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Castle Phoenix Trust is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: Z6078008.

You can contact the Academy Trust as the Data Controller in writing at:
Castle Phoenix Trust, Axholme Road, Coventry. CV2 5BD or enquiries@castlephoenixtrust.org.uk.

What is a Privacy Notice?
A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our pupils and parents.

What is Personal Information?
Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information relates to personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

What personal information do we process about pupils and parents?
The pupil and parent information that we collect, hold and share includes:

- Personal information including a pupil's name, date of birth, unique pupil number, home address
- Attendance information such as sessions attended, number of absences and absence reasons.
- Educational information including records of work, assessment results, relevant medical information, details of pupils' special educational needs, exclusions/behavioural information, post-16 learning information.
- Contact information for parents, carers and other relatives, including telephone numbers, home addresses and e-mail addresses.
- Information about a child's home life, where required as part of necessary safeguarding and welfare processes.
- Details of any support received, including care packages, plans and support providers.

We may also collect, use, store and share (when appropriate) information about your child that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- Any medical conditions we need to be aware of, including physical and mental health
- Photographs and CCTV images captured in school
- Characteristics, such as ethnic background or special educational needs

Why do we use personal information?
We use pupil data:

- To support pupil learning
- To monitor and report on pupil progress
- To provide appropriate pastoral care
- To protect pupil welfare
- To assess the quality of our services
- To comply with the law regarding data sharing
- To safeguard pupils
- To share medical information with health professionals
- Administer admissions waiting lists
- Carry out research

Use of yours or your child's personal data for marketing purposes
Where you have given us consent to do so, we may send you or your child marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to them.
You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by contacting us (see 'Contact us' below).

Use of your child's personal data in automated decision making and profiling
We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

Collecting pupil information
Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order 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.

Most of the data we collect in relation to parents and pupils will come direct from the parent or pupil. However, we may also hold data relating to you and/or your child that has come from:

- Local authorities
- Government departments or agencies
- Police force, courts, tribunals
- External support services

What are the legal reasons for us to process your personal information?

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. The lawful reasons we have for processing personal information are as follows:

1) To comply with the law

We collect and use general purpose pupil information in order to meet certain legal requirements and legal obligations placed upon the Academy Trust by law. We therefore are required to process personal information for such purposes even if you have not consented to us doing so.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

If you would like a copy of or further information regarding the statutory authorities that underpin our legal obligations, you should contact the School/Academy Trust in writing.

2) To protect someone's vital interests

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

3) With the consent of the individual to whom that information 'belongs'

Whilst much of the personal information processed is in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

4) To perform a public task

It is a day-to-day function of the Academy Trust to ensure that children receive the education and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that pupils are properly educated and supported

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

5) We have a legitimate interest

Occasionally we have reasons to process information which fall outside of our usual day-to-day school functions. Details of the type of processing that we may undertake on this basis are set out in Table 5.

Special category personal information
In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

1) Explicit consent of the data subject
2) Processing relates to personal data which is manifestly made public by the data subject

3) Necessary for establishing, exercising or defending legal claims
4) Necessary for reasons of substantial public interest
5) Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
6) Necessary for archiving, historical research or statistical purposes in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

Who might we share your information with?
We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- School nurse
- NHS
- Public Health and other public health agencies
- Information Management software: Arbor, Wonde
- Safeguarding and Visitor Management: CPOMS, Inventry
- Engagement & Survey Platforms: The Engagement Platform (TEP) – used for staff, pupil and (where relevant) parent engagement surveys
- We use a range of online educational platforms and home learning tools to support pupil learning, communication and school operations. These may include, but are not limited to: Microsoft Teams, Firefly, FFT Aspire, Smartgrade (primaries), No More Marking (primaries), Sisra (secondaries), Unifrog, Times Tables Rockstars, Magma Maths, GL Assessments, Seneca.
- Photography Companies

We do not share information about our pupils or parents unless the law and our policies allow us to do so.

Data collection requirements:
To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to https://www.gov.uk/education/data-collection-and-censuses-for-schools.

What do we do with your information?
All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected The School/ Academy Trust monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

We have security measures in place to prevent yours and your child's information from being

accidentally lost, used, or accessed in an authorised way, altered, or disclosed.

How long do we keep your information for?
In retaining personal information, the school/Academy Trust complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the school/Academy Trust are required to retain the information.

A copy of those schedules can be located using the following link:
http://irms.org.uk/page/SchoolsToolkit

Transferring data internationally
Where we transfer personal data to a country outside of the UK, we will do so with the appropriate safeguards in place in accordance with data protection law.

What are your rights with respect of your personal information?
Under data protection law, 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 to have access to your child's educational record, contact the school data protection contact or the School Data Protection Officer at Warwickshire Legal Services via email at schooldpo@warwickshire.gov.uk or alternatively;

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL

****Please ensure you specify which school your request relates to.**

In certain circumstances where the school/academy trust processes data for the purposes of legitimate interests or to fulfil their public task, individuals have a right to object to the processing where it is likely to cause, or is causing, harm or distress. When exercising this right, individuals should contact the school/academy trust to inform them of their reasons for their objection. The school/academy trust will consider the reasons for any objection and asses the risk to the individual against the purposes for the processing. In the event the school/academy trust is unable to comply with an objection, we will ensure we can demonstrate compelling legitimate grounds to continue with the processing.

Where the school/academy trust processes your information with your consent, you have the right to withdraw your consent at any time. To exercise this right, please contact the school's Data Protection Lead. If you are unsure who to contact, please contact the school office or refer to your school's website.

You also have the right to:

- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

- Subject to the complaints procedure below, you have the right to complain to the ICO

Data Protection Complaints

We are committed to handling your personal data in a way that is fair, transparent, and in accordance with the law. If you are unhappy with how we have handled your data, this process outlines how you can make a complaint.

How to Make a Complaint

If you have a complaint about how your data has been handled, please contact our Data Protection Lead (DPL) or our Data Protection Officer (DPO). This allows us to investigate and resolve the issue as quickly as possible.

- Trust DPL Email: emma.phillips@castlephoenixtrust.org.uk
- School/Trust DPO: Schooldpo@warwickshire.gov.uk

When you contact us, please provide as much detail as possible about your complaint. This will help us to understand the issue and investigate it thoroughly.

What to Expect from us

We will acknowledge receipt of your complaint within 30 days. We will, without undue delay, take appropriate steps to respond to your complaint, including making appropriate enquires.

Throughout the process, we will:

- Keep you informed of our progress.
- Request any additional information we may need from you in a timely and proportionate manner.
- Provide you with a clear and comprehensive outcome of our investigation.

If You Remain Unhappy

If you are not satisfied with the outcome of your complaint, or if you feel we have not handled it appropriately, you have the right to complain to the Information Commissioner's Office (ICO). The ICO is the UK's independent regulator for data protection and information rights.

For more information about the ICO and their complaints process, you can visit their website at ico.org.uk.

Review

The content of this Privacy Notice will be reviewed at the beginning of each academic year.

Table 1 – Personal information we are required to process to comply with the law:

Information Type	Relevant legislation	Special Category– additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Special Education Needs Report	*Children's and Families Act 2014, section 69*		*Local Authority*	Legal Obligation
Attendance register	*Education (Pupil Registration)(England) Regulations 2006, Regulation 4, 10, 11 and 12*		*OFSTED, Local Authority*	Legal Obligation
Common Transfer file	*Education (Pupil Registration)(England) Regulations 2005, Regulation 6*		*School pupil transfers*	Legal Obligation
Safeguarding information	*Education Act 2002, section 175* *Children's Act 1989, Section 17, 47, 83.* *Children's Act 2004, Section 11*		*Local Authority*	Legal Obligation
Admissions Register	*Education (Pupil Registration)(England) Regulations 2006, Regulation 4, 10, 11, 14 and 15*		*OFSTED, Local Authority*	Legal Obligation
Curricular Record including Assessment and achievement data	*Education (Pupil Information) (England)Regulations 2005, Regulation 4*		*OFSTED, Local School. Local Authority*	Legal Obligation
Educational Record	*Education (Pupil Information) (England)Regulations 2005, Regulation 5 and 6*		*Parents, Local school*	Legal Obligation
Pupil Information i.e	*Education (Information*		*Department of Education –*	Legal Obligation

name, age address, Emergency contact details	*About Individual Pupils) (England) Regulations 2013, Regulation 3 and 5*		*school census. Other schools – when pupils transfers*	
Medical / Dietary / allergies		Necessary for preventative or occupational medicine	*Department of Education – school census. Other schools – when pupils transfers*	Legal Obligation
School Census	*Education Act 1996, Sections 537 & 537A, and accompanying regulations*		*Department of Education*	Legal Obligation
Staff information, including personal details, DBS check, qualifications	*Education Act 2005, section 114*		*Secretary of State, Coventry City Council/Warwickshire County Council, Disclosure and Barring Service*	Legal Obligation

Table 2 – Personal information we are required to process as it is necessary to protect someone's vital interests

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Medical Information	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent'	*Medical staff i.e. paramedics/ambulance*	*Vital Interest*
Religious belief	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent'	*Medical staff i.e. paramedics/ambulance*	*Vital Interest*

Table 3 - Personal information we are required to process with the consent of the individual to whom that information 'belongs' - *please note that you have the right to withdraw your consent for us to process this information at any time.*

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Photographs		*Government agencies, eg Department for Education,*	*Consent*
Email address		*Not shared*	

Table 4 - Personal information we are required to process because it is necessary to do so in order to perform a public task – please note that the right to object will apply to ***some*** of this processing, please see the section above that refers to '*What are your rights with respect of your personal information?*'

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Pupil Information i.e name, age address, Parent detail, Emergency contact details		*Department of Education – school census. Other schools – when pupils transfers*	*Legal Obligation*
Academic Progress data including Leuven data, wellcom data, Learning journals, staff observations		*OFSTED, Parents, Health such as Speech and Language*	*Public Task & Legal Obligation*
Safeguarding information, Medical, Special Education Needs		*Local Authority, Health, Parents*	*Legal Obligation*
Educational and Safeguarding Information used internally for the purpose of educating and protecting the welfare of children.		*None (internal use only)*	*Public task*

Table 5 - Personal information we process because we have a legitimate interest. please note that the right to object will apply to ***some*** of this processing, please see the section above that refers to '*What are your rights with respect of your personal information?*'

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Images captured on our CCTV system	n/a	This is not shared routinely	n/a