GMAT POLICIES

Student Privacy

Greater Manchester Academies Trust

Revision Information

This document has been approved for operation within	All Trust Establishments
Date of last review	July 2026
Date of next review	August 2028
Review Period	Every two years
Date approved	
Status	
Person Responsible for Policy	Chief Operating Officer
Owner	Greater Manchester Academies Trust

Review Date	Changes Made	By Whom
Sept 2021	• Layout changed • DPO statement added • DPO email address changed	NB
16/09/2024	• DPO email address updated	AW
27/07/2026	• Updated UK GDPR terminology. • Updated students' rights wording. • Updated international transfer wording. • Added AI and automated decision-making wording. • Minor legislative and formatting updates.	NB

Data Protection Officer

The data protection officer (DPO) is responsible for overseeing the implementation of this policy, monitoring our compliance with data protection law, and developing related policies and guidelines where applicable.

They will provide an annual report of their activities directly to the Trust governing board and, where relevant, report to the Trust board their advice and recommendations on Academy data protection issues.

The DPO is also the first point of contact for individuals whose data the Trust processes, and for the ICO.

Full details of the DPO's responsibilities are set out in their job description. Our DPO is Andrew Woolley and is contactable via DPO@gmatrust.co.uk,

With you…for you…about you…

Privacy Notice for Students

You have a legal right to be informed about how our school uses any personal information that we hold about you. To comply with this, we provide a 'privacy notice' to you where we are processing your personal data.

This privacy notice explains how we collect, store and use personal data about you.
We, Greater Manchester Academies Trust, are the 'data controller' for the purposes of data protection law.

Our data protection officer is Mr Andrew Woolley

The Personal Data we hold

We hold some personal information about you to make sure we can help you learn and look after you at school.

For the same reasons, we get information about you from some other places too – like other schools, the local council and the government.

This information includes:

- Your contact details
- Your test results
- Your attendance records
- Your characteristics, like your ethnic background or any special educational needs
- Any medical conditions you have
- Details of any behaviour issues or exclusions
- Photographs
- CCTV images
- Safeguarding information where required to protect pupils.
- Information relating to the use of Trust IT systems where necessary for safeguarding, security and educational purposes.

Why We Use this Data

We use this data to help run the school, including to:

- Get in touch with you and your parents when we need to
- Check how you're doing in exams and work out whether you or your teachers need any extra
- help
- Track how well the school as a whole is performing
- Look after your wellbeing

The Trust may use approved Artificial Intelligence (AI) tools to help staff with administrative tasks and educational support. Any use of AI involving personal information will always be checked by staff and will

comply with data protection law. AI will not make important decisions about you without appropriate human involvement.

Our Legal Basis for Using this Data

We will only collect and use your information when the law allows us to. Most often, we will use your information where:

- We need to comply with the law
- We need to use it to carry out a task in the public interest (in order to provide you with an education)

Sometimes, we may also use your personal information where:

- You, or your parents/carers have given us permission to use it in a certain way
- We need to protect your interests (or someone else's interest)

Where we have got permission to use your data, you or your parents/carers may withdraw this at any time. We will make this clear when we ask for permission, and explain how to go about withdrawing consent.

Some of the reasons listed above for collecting and using your information overlap, and there may be several grounds which mean we can use your data.

Collecting this Information

While in most cases you, or your parents/carers, must provide the personal information we need to collect, there are some occasions when you can choose whether to provide the data.

We will always tell you if it's optional. If you must provide the data, we will explain what might happen if you don't.

How We Store this Data

We will keep personal information about you while you are a pupil at our school. We may also keep it after you have left the school, where we are required to by law.

We have a retention schedule which sets out how long we must keep information about pupils. A copy of this is available on request from our DPO

GMAT's DPO can be contacted on 0161 2020161 or email DPO@gmatrust.co.uk

Data Sharing

We do not share personal information about you with anyone outside the school without permission from you or your parents/carers, unless the law and our policies allow us to do so.

Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you with:

- Our local authority – to meet our legal duties to share certain information with it, such as concerns about students' safety and exclusions
- The Department for Education (a government department)
- Your family and representatives
- Educators and examining bodies
- Our regulator e.g. Ofsted
- Suppliers and service providers – so that they can provide the services we have contracted them for
- Financial organisations
- Central and local government
- Our auditors
- Health authorities
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies

National Pupil Data

We are required to provide information about you to the Department for Education (a government department) as part of data collections such as the school census.

Some of this information is then stored in the National Pupil Database, which is managed by the Department for Education and provides evidence on how schools are performing. This, in turn, supports research.

The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards and others.

The Department for Education may share information from the database with other organisations which promote children's education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data.

You can find more information about this on the Department for Education's webpage on how it collects and shares research data.

You can also contact the Department for Education if you have any questions about the database.

Youth Support Service

Once you reach the age of 13, we are legally required to pass on certain information about you to Manchester City Council as it has legal responsibilities regarding the education or training of 13-19 year-olds.

This information enables it to provide youth support services, post-16 education and training services, and careers advisers.

Your parents/carers, or you once you're 16, can contact our data protection officer to ask us to only pass your name, address and date of birth to Manchester City Council.

How to access personal information we hold about you

You can find out if we hold any personal information about you, and how we use it, by making a 'subject access request', as long as we judge that you can properly understand your rights and what they mean.

If we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and using it, and how long we will keep it for
- Explain where we got it from, if not from you or your parents
- Tell you who it has been, or will be, shared with
- Let you know if we are using your data to make any automated decisions (decisions being
- taken by a computer or machine, rather than by a person)
- Give you a copy of the information

You may also ask us to send your personal information to another organisation electronically in certain circumstances.

If you want to make a request please contact our data protection officer.

Your other rights over your data

You have other rights over how your personal data is used and kept safe, including the right to:
ask to see the personal information we hold about you;
- ask us to correct information that is wrong;
- ask us to delete information where the law allows;
- ask us to ask us to limit how we use your information in certain situations;
- object to how we use your information where the law allows;
- withdraw your consent where we have asked for it;
- ask us to transfer your information to another organisation where appropriate;
- object to decisions made only by automated systems where applicable;
- complain to the Information Commissioner's Office (ICO).

Further information and guidance

GMAT DPO is the person responsible for managing how we look after personal information and deciding how it is shared.

Like other organisations we need to keep your information safe, up to date, accurate, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.

This notice is to explain how we use your personal information. GMAT's DPO can answer any questions which you may have.

Please speak to GMAT's DPO if:

- you object to us using your information for marketing purposes e.g. to send you information about
- school events. We will stop using your information for marketing purposes if you tell us not to; or you would like us to update the information we hold about you; or
- you would prefer that certain information is kept confidential.

GMAT's DPO can be contacted on 0161 2020161 or email DPO@gmatrust.co.uk

Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer on 0161 2020161 or email DPO@gmatrust.co.uk

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at https://ico.org.uk/concerns/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire,SK9 5AF