GMAT POLICIES

Parent 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
Status	
Date approved	
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 changed	NB
16/09/2024	• DPO email address updated	AW
27/07/2026	• Updated UK GDPR terminology. • Added AI and automated decision-making wording. • Updated international transfer wording. • Updated individual rights. • Updated legislative references and formatting.	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…

Introduction

This notice is to help you understand how and why we collect personal information about you and what we do with that information. It also explains the decisions that you can make about your own information.

If you have any questions about this notice, please contact the DPO – DPO@gmatrust.co.uk

What is personal information?

Personal information is information that identifies you as an individual and relates to you.
Personal data that we may collect, use, store and share (when appropriate) about students includes,
but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Characteristics, such as ethnic background, eligibility for free school meals, or special
- educational needs
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs
- CCTV images captured in school
- Records relating to communication between the Trust and parents/carers.
- Information relating to the use of Trust online services where necessary for safeguarding, security and educational purposes.

How and why does the school collect and use personal information?

While the majority of information we collect about students is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

We set out below examples of the different ways in which we use personal information and where this personal information comes from. GMAT's primary reason for using your personal information is to provide educational services to your child.

- We obtain information about you from admissions forms and from your child's previous school. We may also get information from professionals such as doctors and from local

authorities.

The Trust may use approved Artificial Intelligence (AI) technologies to assist with administrative tasks and educational support. Any use of AI involving personal information will remain subject to appropriate human oversight and will comply with UK data protection legislation. AI will not be used to make solely automated decisions that have legal or similarly significant effects on pupils or parents without complying with UK GDPR.

- We may have information about any family circumstances, which might affect your child's welfare or happiness.
- We may need information about any court orders or criminal petitions, which relate to you.
- This is so that we can safeguard the welfare and wellbeing of your child and the other pupils
- within GMAT.
- We use CCTV to make sure GMAT sites are safe. CCTV is not used in private areas such as toilets or changing rooms.
- We may take photographs or videos of you at GMAT events to use on social media, Academies website, and used by outside organisations such as the TV media. This is to show prospective parents and pupils what we do here and to advertise GMAT.
- We may continue to use these photographs and videos after your child has left.
- We may send you information to keep you up to date with what is happening at GMAT.
- For example, by sending you information about events and activities taking place (including
- fundraising events) and GMAT newsletter.
- We may keep details of your address when your child leaves GMAT so we can find out how your child is progressing.
- We may use information about you if we need this for historical research purposes or for statistical purposes.

What are my rights regarding personal data?

Individuals have a right to make a 'subject access request' to gain access to personal information that GMAT holds about them.

Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

Parents also have the right to make a subject access request with respect to any personal data GMAT holds about them.

If you make a subject access request, and if we do hold information about you or your child, we will:

- Give you a description of it
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data,

- and any consequences of this
- Give you a copy of the information in an intelligible form

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

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

Do I have any other rights?

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- request access to personal information;
- request correction of inaccurate information;
- request erasure where applicable;
- request restriction of processing;
- object to processing where applicable;
- withdraw consent where processing relies upon consent;
- request data portability where applicable;
- object to decisions based solely on automated processing where applicable;
- complain to the Information Commissioner's Office (ICO).

To exercise any of these rights, please contact our data protection officer.

How we store this data?

We keep personal information about pupils while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. Our record retention schedule/records management policy sets out how long we keep information about pupils.

Do you share my personal information with third parties?

We do not share information about students with any third party without consent unless the law and our policies allow us to do so.

- In accordance with our legal obligations, we may share information with local authorities and the Department for Education, for example, where we have any safeguarding concerns and exclusions.
- On occasion, we may need to share information with the police or courts.
- We may also need to share information with our legal advisers for the purpose of obtaining
- legal advice.
- Occasionally we may use consultants, experts and other advisors to assist GMAT in fulfilling its obligations. We might need to share your information with them if this is relevant to their work.
- If your child is not of British nationality, we have to make sure that your child has the right to study in the UK.
- We may share some information with our insurance company, for example, where there is a serious incident at GMAT.
- If your child leaves us to attend another school we may need to provide that school with information about you. For example, details of family circumstances for safeguarding reasons.

- Cloud service providers who securely host or process information on behalf of the Trust.
- IT support and cybersecurity providers where necessary to maintain the security and availability of Trust systems.

- We may share information about you with others in your family, such as another parent or step-parent. For example, where this is part of our obligation to take care of your child, as part of our wider legal and regulatory obligations.
- We may need to share information if there is an emergency, for example, if you are hurt whilst on GMAT premises.

We pass information to the -

National Pupil Database

We are required to provide information about students to the Department for Education as part of statutory data collections such as the school census and early years census.

Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the Government Education Department and provides evidence on school performance to inform research.

The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

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

For more information, see the Department's webpage on how it collects and shares research data.

You can also contact the Department for Education with any further questions about the NPD.

Youth support services

Once our students reach the age of 13, we are legally required to pass on certain information about them 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.

Parents/carers, or students once aged 16 or over, can contact our data protection officer to request that we only pass the individual's name, address, date of birth and destination to Manchester City Council.

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

What are our legal grounds for using your information?

This section contains information about the legal basis that we are relying on when handling your information.

Legitimate interests

This means that the processing is necessary for legitimate interests except where the processing is unfair to you. GMAT relies on legitimate interests for most of the ways in which it uses your information.

Specifically, GMAT has a legitimate interest in:

- Providing educational services to your child;
- Safeguarding and promoting the welfare of your child (and other children);
- Promoting the objects and interests of GMAT. This includes fundraising;
- Facilitating the efficient operation of the GMAT; and
- Ensuring that all relevant legal obligations GMAT must complied with.

If you object to us using your information where we are relying on our legitimate interests as explained above please speak to the GMAT DPO.

Necessary for a contract

We will need to use your information in order to perform our obligations under our contract with you. For example, we need your name and contact details so that we can update you on your child's progress and so that we can contact you if there is a concern.

Legal obligation

Where GMAT needs to use your information in order to comply with a legal obligation, for example to report a concern to Children's Services. We may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

Vital interests

For example, to prevent someone from being seriously harmed or killed.

Public interest

GMAT considers that it is acting in the public interest when providing education.

GMAT must also comply with an additional condition where it processes special categories of personal information. These special categories are as follows: personal information revealing racial

or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information,
biometric information, health information, and information about sex life or orientation.

Substantial public interest

The processing is necessary for reasons of substantial public interest.

Vital interests:

To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

Legal claims:

The processing is necessary for the establishment, exercise or defense of legal claims. This allows us to share information with our legal advisors and insurers.

Medical purposes

This includes medical treatment and the management of healthcare services.
We may ask for your consent to use your information in certain ways. If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. Please speak to GMAT DPO if you would like to withdraw any consent given.

Do we send information to other countries?

No, GMAT always ensures that any data will be stored will be on systems located in countries that are approved by the The European Commission. The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here:
http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

For how long do we keep your information?

We keep your information for as long as we need to in order to educate and look after your child. We will keep some information after your child has left GMAT, for example, so that we can find out what happened if you make a complaint.

In exceptional circumstances, we may keep your information for a longer time than usual but we would only do so if we had a good reason and only if we are allowed to do so under data protection law.

We can keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes.

What decisions can you make about your information?

From May 2018 data protection legislation gives you a number of rights regarding your information.
Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

- if information is incorrect you can ask us to correct it;
- you can also ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to;
- you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information;
- you can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer;
- our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy;

GMAT DPO can give you more information about your data protection rights.

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