



PRIVACY NOTICE

JUNE 2026

Version Control

Review Date	Updates
June 2026	Updated legislation and guidance
March 2026	
	Addition of picoCTF, MBop and Code.org
December 2025	Addition of Isaac Science, Unifrog and Know-it-all-Ninja
July 2025	Merging of Primary, Secondary and Staff Privacy Notices

PRIVACY NOTICE

1. Scope

This privacy notice covers all data subjects (staff, students and their families) whose personal data is collected in the provision of employment and education at Spark Education Trust schools, in line with the requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Responsibilities

The Data Protection Officer is responsible for ensuring that this notice is made available to data subjects prior to Spark Education Trust collecting/processing their personal data.

All Employees/Spark Education Trust are responsible for ensuring that this notice is drawn to the attention of data subjects and that personal data is processed in accordance with UK data protection legislation.

3. Privacy notice

Spark Education Trust is a group of secondary and primary schools with a common aim to inspire the imaginations of our students and to support them to develop in ways which stand them in good stead for their future lives and responsibilities as individuals, employees and citizens.

Spark Education Trust is a company limited by guarantee registered in England.

Company Number: 10249712

Registered Office: Whinstone Primary School, Lowfields Avenue, Stockton On Tees, TS17 0RJ

ICO Registration Number ZA194005

Our Data Protection Officer can be contacted directly here:

dpo@sparkeducation.org.uk

01642 051020

Primary Schools

The personal data we would like to collect from/process about primary school pupils and their families is:

Data Ref	Personal data type:	Source (where Spark Education Trust obtained the personal data from if it has not been collected directly from you, the data subject.):
1	Pupil personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, care arrangements, court orders	
2	Pupil ethnicity, language	
3	Pupil Free school meal eligibility	Stockton Borough Council Confidential Free School Meals Helpline
4	Parent/Carer names, contact telephone numbers, email addresses, addresses, marital status	
5	Attendance information – number of absences, sessions late, absence reasons	
6	Assessment information – national curriculum assessment results, teacher assessment results	Teaching Staff
7	Pupil SEN provision (formerly stage) Pupil SEN type ranking, provision maps, support plans	Teaching Staff
8	Behavioural information – e.g. number of temporary exclusions	Head Teacher
9	Pupil medical information – individual healthcare plans, medication, allergies	
10.1	Photographs and video images (forming part of pupil assessment record)	Teaching Staff, Seesaw
10.2	Photographs of individual pupils (taken by third party kept on pupil record)	Tempest Photography
10.3	Photographs of individual pupils (taken by third party for sale to parents)	Tempest Photography

10.4	Photographs of groups of pupils (taken by third party for sale to parents)	Tempest Photography
10.5a	First name, surname, photographs and video images (used in displays, school publications and printed garments such as hoodies and t-shirts).	Teaching Staff
10.5	First name, photographs and video images shared on school website and social media	Teaching Staff
10.6	First name, photographs and video images (in local or national newspapers, televised news programmes or on media website)	
11	CCTV video surveillance (<i>Junction Farm and The Links Primary only</i>)	
12	Telephone call recordings (<i>Junction Farm Primary and The Links Primary only</i>)	

The personal data we collect will be used for the following purposes:

Data Ref	Personal data type:	Purpose of processing
1	Pupil personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, care arrangements, court orders	To support pupil learning To monitor and report on pupil progress To provide appropriate pastoral care
2	Pupil ethnicity, language	To safeguard the individuals on our premises To assess the quality of our service To maintain school information required by law
3	Pupil free school meal eligibility	To monitor and report on pupil progress To provide appropriate pastoral care To maintain school information required by law
4	Parent/Carer names, contact telephone numbers, email addresses, addresses, marital status	To provide appropriate pastoral care To safeguard the individuals on our premises

		To communicate with parents
5	Attendance information – e.g. number of absences and absence reasons	To monitor and report on pupil progress To provide appropriate pastoral care To safeguard the individuals on our premises To maintain school information required by law
6	Assessment information – national curriculum assessment results, teacher assessment results	To monitor and report on pupil progress To assess the quality of our service To provide appropriate pastoral care To maintain school information required by law
7	Pupil SEN provision (formerly stage) Pupil SEN type ranking, provision maps, support plans	To monitor and report on pupil progress To provide appropriate pastoral care To safeguard the individuals on our premises To maintain school information required by law
8	Behavioural information – e.g. number of temporary exclusions	To support pupil learning To monitor and report on pupil progress To assess the quality of our service To provide appropriate pastoral care To safeguard the individuals on our premises To maintain school information required by law
9	Pupil medical information – individual healthcare plans, medication, allergies	To provide appropriate pastoral care To safeguard the individuals on our premises
10.1	Photographs and video images (forming part of pupil assessment record)	To monitor and report on pupil progress

10.2	Photographs of individual pupils (taken by third party kept on pupil record)	To provide appropriate pastoral care To safeguard the individuals on our premises
10.5a	First name, surname, photographs and video images (used in displays, school publications and printed garments such as hoodies and t-shirts).	To communicate with parents and wider community
10.5	First name, photographs and video shared on school website and social media	
10.6	First name, photographs and video images (in local or national newspapers, televised news programmes or on media website)	
11	CCTV video surveillance	To safeguard the individuals on our premises
12	Telephone call recordings	To safeguard the individuals on our premises

Our legal basis for processing the personal data is as follows:

Note: "Article" refers to the section of the UK GDPR under which lawful processing is permitted.

Data Ref	Personal data type:	Legal Basis
1	Pupil personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, care arrangements, court orders	Article 6(1)(e) – official authority processing is necessary in the exercise of official authority vested in the controller (Education Act 1996)
2	Pupil ethnicity, language	
3	Pupil free school meal eligibility	Article 6(1)(c) – legal obligation Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013
4	Parent/Carer names, contact telephone numbers, email addresses, addresses, marital status	
5	Attendance information – e.g. number of absences and absence reasons	
6	Assessment information – national curriculum assessment results, teacher assessment results	
7	Pupil SEN provision (formerly stage) Pupil SEN type ranking, provision maps, support plans	

8	Behavioural information – e.g. number of temporary exclusions	
9	Pupil medical information – individual healthcare plans, medication, allergies	
10.1	Photographs and video images (forming part of pupil assessment record)	

7	Pupil SEN provision (formerly stage) Pupil SEN type ranking, provision maps, support plans	Article 6(1)(c) – legal obligation: Section 100 Children and Families Act 2014 Article 6(1)(d) – vital interest
9	Pupil medical information – individual healthcare plans, medication, allergies	
6	Assessment information – national curriculum assessment results, teacher assessment results	Article 6(1)(c) – legal obligation Regulation 3(1) Part 1 The Education (Independent School Standards) Regulations 2014
7	Pupil SEN provision (formerly stage) Pupil SEN type ranking, provision maps, support plans	

4	Parent/Carer names, contact telephone numbers, email addresses, addresses	Article 6(1)(d) – to protect the vital interests of the data subject
10.2	Photographs of individual pupils (taken by third party kept on pupil record)	

11	CCTV video surveillance	Article 6(1)(e) – official authority Section 547 of the Education Act 1996
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12	Telephone call recordings	Article 6(1)(d) – to protect the vital interests of the data subject
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The legitimate interests pursued by us are as follows:

Note: “Article” refers to the section of the UK General Data Protection Regulation (UK GDPR) under which lawful processing is permitted.

Data Ref	Personal data type:	Legitimate interests
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4	Parent/Carer names, contact telephone numbers, email addresses, addresses	Article 6(1)(f) – legitimate interest To communicate with parents
10.5a	First name, surname, photographs and video images (used in displays, school publications and printed garments such as hoodies and t-shirts).	Article 6(1)(f) – legitimate interest To communicate with parents and wider community; to celebrate key milestones in our school community.

The special categories of personal data concerned are:

Note: “Article” refers to the section of the UK General Data Protection Regulation (UK GDPR) under which lawful processing of special category data is permitted.

Data Ref	Special categories of personal data:	Lawful basis for processing
2	Pupil ethnicity, language	Article 9(2)(b) – obligation of the controller authorised by law The data subject may withhold this information at the time of collection if they choose.
7	Pupil SEN provision (formerly stage) Pupil SEN type ranking, provision maps, support plans	Article 9(2)(b) – obligation of the controller authorised by law
9	Pupil medical information – individual healthcare plans, medication, allergies	Article 9(2)(b) – obligation of the controller authorised by law

Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Consent is required for Spark Education Trust to process both types of personal data, but it must be explicitly given. Where we are asking you for sensitive personal data we will always tell you why and how the information will be used.

The personal data that requires your explicit consent for processing is as follows:

Data Ref	Personal data type:	Purpose of processing where Article 6(1)(a) – consent is explicitly required
10.3	Photographs of individual pupils (taken by third party for sale to parents)	An external photographer, using his/her own equipment, also comes into school in to take individual student and group
10.4	Photographs of groups of pupils (taken by third party for sale to parents)	

		photographs that are then made available for parents to purchase
10.5	First name, photographs and video images shared on Trust websites and social media	We may take photographs or videos for use on Trust websites/social media. Photographs and videos may also be taken on school trips and activities for use by the school. School equipment will be used to take photographs or record images.
10.6	First name, photographs and video images (in local or national newspapers, televised news programmes or on media website)	Occasionally Spark schools may be visited by the media to take photographs or videos of an event or particular achievement we are celebrating. Students will often appear in these images, which may feature in local or national newspapers, televised news programmes or on media websites. When filming or photography is carried out by the media they will use their own equipment, students first names will only be shared if there is a particular reason to do so.

Primary School Disclosure

Spark Education Trust has a legal obligation to routinely pass on your personal data to the third parties listed below:

Data Ref	Personal Data Type	Name of Third Party	Purpose of processing
1	Pupil personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, care arrangements.	Department for Education LRS	Article 6(1)(c) - legal obligation Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013 Department for Education (DfE) and National Pupil Database (NPD) The Department for Education (DfE) collects personal information from educational settings and local authorities via statutory data collections. Spark Education Trust is required by law to provide information about our pupils to the DfE and local authorities under the Education Acts and associated regulations. Some of the information we provide is stored in the National Pupil Database (NPD). The NPD is owned and managed by the DfE and contains information about pupils in schools and colleges in England. The DfE uses information from the NPD to support education policy and the monitoring of educational attainment and outcomes. The DfE may share information from the NPD with organisations that carry out research and analysis, produce statistics, or provide information, advice and guidance where this is permitted by law and subject to appropriate safeguards. The DfE has robust processes in place to ensure that personal data is handled securely and confidentially. Decisions about who can access NPD data are subject to strict approval processes. For more information about how the DfE collects and uses personal information please follow the link below - https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter For information about the National Pupil Database, including the data held and how it is shared, please follow the link below - https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information
2	Pupil ethnicity, language		
3	Pupil free school meal eligibility		
5	Attendance information – e.g. number of absences and absence reasons		

6	Assessment information – national curriculum assessment results, teacher assessment results		
7	Pupil SEN provision (formerly stage) Pupil SEN type ranking, provision maps, support plans		
8	Behavioural information – e.g. number of temporary exclusions		
1-9	Personal Data Type 1-9 listed above	Destination School	Article 6(1)(e) – official authority processing is necessary in the exercise of official authority vested in the controller (Education Act 1996)
4	Parent/Carer names, contact telephone numbers, email addresses, addresses, marital status		Article 6(1)(c) – legal obligation Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013 Your child's destination school will have its own Privacy Policy.

1-8	Personal Data Type 1-8	Local Authority Authorities and those responsible for looked after or previously looked after children Welfare Call	Article 6(1)(c) - legal obligation Section 175 Education Act 2002 places a duty on both the Education Provider and the LA to safeguard and promote the welfare of children. Education Act 1996 Section 436A imposes a duty on the LA to identify and monitor children missing education. Education Act 1996 Section 444 places responsibilities on the LA in terms of enforcing pupil attendance. Exclusion from maintained schools, academies and pupil referral units in England 2017 Education Providers are obliged by its funding agreement to follow current law and DfE advice on Exclusions.
			Retrieve a copy of the Privacy Policies in place here Middlesbrough Council's Privacy Policy Stockton Borough Council's Privacy Policy Welfare Call is used to collect the attendance of pupils classified as being a looked after child. Welfare Call - Privacy Notice

The following third parties will receive your personal data for the following purpose(s) as part of our routine processing activities (public task):

Data Ref	Personal Data Type	Name of Third Party	Purpose of processing
1-9	Personal Data Type 1-9	Capita SIMS	Arbor is replacing SIMS as our electronic management information system and contains the majority of our pupil records. Capita Privacy Notice Arbor Privacy Notice
10.2	Photographs of individual pupils (taken by third party kept on pupil record)	Arbor Edukey (TES) For Provision Mapping	
			Staff have permissions-controlled access to this. Edukey Privacy Notice

1-9	Personal Data Type 1-9	CPOMS	CPOMS is our child protection online management information system and contains the majority of our pupil records including behavior, welfare and medical records. Staff have permissions-controlled access to this.
9	Pupil medical information – individual healthcare plans, medication, allergies	Caterlink Middlesbrough & Stockton on Tees Council Catering	We share the data identified with our catering providers to cater to individual dietary requirements.
1	Pupil personal information – names, date of birth, gender, contact telephone numbers, addresses,	CRB Cunningham	Junction Farm and The Links operate a cashless catering system. We share the data identified with CRB Cunningham to enable children to choose their
	pupil identification number		meals and record transactions on their child meal account.
3	Free School Meal Eligibility		
5	Attendance information – absences		
10.2	Photographs of individual pupils (taken by third party kept on pupil record)		

1-10	Personal Data Type 1-10	Microsoft Google Adobe Groupcall HCSS – Access Group Wonde ONE ITT	These are the operating systems used within the Trust to create, store and share documents. Wasabi is used for off site backups.
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		Autodata / Wasabi Apple	
1	Pupil personal information – names, pupil identification number	Learning Platform Providers and online resources 2Build a Profile British Cycling Education City Lexia Core	Spark Education Trust schools provide pupils and parents access to a number of learning platforms and online resources to support pupil learning using the personal data identified. Retrieve a copy of the Privacy Policies in place here: 2Build a Profile British Cycling (Ready Set Ride) Education City Privacy Policy Lexia Core Privacy Policy

	MyMaths	MyMaths Privacy Policy
	Purple Mash	Purple Mash Privacy Policy
	SPAG.com	SPAG.com Privacy Policy
	Times Tables Rockstars	Times Tables Rockstars Privacy Policy
	Teach Your Monster to Read	Teach Your Monster to Read Privacy Notice
	Word/Number Shark	Word Shark/Number Shark Privacy Policy
	Spelling Shed	Spelling Shed Privacy Policy
	Grammar & Spelling Bug	Grammar & Spelling Bug Privacy Policy
	Literacy Shed + Showbie	Literacy Shed + Privacy Notice
	White Rose Maths	Showbie Privacy Notice
	Doodlemaths & Tables	White Rose Maths Privacy Notice
	Primary	Doodle Maths & Tables Privacy Notice
		Primary Languages Network Privacy Notice
		Scratch Privacy Policy

		Languages	Tinkercad Privacy Notice
		Network VLE	Canva Privacy Policy
			Turtle Academy Privacy Policy
		Scratch	Star Reader Privacy Notice
			Language Angels Privacy Notice
		Tinkercad	
		Canva	
		Turtle Academy	
		Star Reader	
		Language Angels	

4	Parent/Carer names, email addresses, addresses	Mailchimp	Chandlers Ridge Academy uses Mailchimp to create its weekly eNewsletter using the personal information identified.
10.5	First name, photographs and video images (used in displays, school)		

	publications, shared on school website and social media)		The email addresses of parents who have signed up to the eNewsletter are held by Mailchimp on the mailing list. Every email that is sent gives the user facility to unsubscribe. We require your explicit consent for processing this data Retrieve a copy of the Privacy Policy in place here https://mailchimp.com/legal/privacy/
1	Pupil personal information – names, pupil identification number	MarvellousMe SeeSaw	Some Spark Education Trust schools track and communicate their child's progress with parents by sharing the personal data identified with MarvellousMe and photos and videos of work and presentations via See Saw.
10.1	Photographs and video images (forming part of pupil assessment record)		Retrieve a copy of the Privacy Policy in place http://marvellousme.com/privacy-policy/ SeeSaw Privacy Policy

1	Pupil personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, care arrangements.	NHS and other support services	We may refer your child to an NHS service such as speech and language, occupational health and Child & Adolescent Mental Health Services. We may also refer your child to access other support services such as Educational Psychology, counselling, family therapy and play therapy. We will tell you before we process this information.
2	Pupil ethnicity, language		
4	Parent/Carer names, contact telephone numbers, email		

	addresses, addresses, marital status		
5	Attendance information – e.g. number of absences and absence reasons		
7	Pupil SEN provision (formerly stage) Pupil SEN type ranking, provision maps, support plans		
8	Behavioural information – e.g. number of temporary exclusions		
9	Pupil medical information – individual healthcare plans, medication, allergies		

	All personal information within this privacy notice	OneIT SS Autodata/ Wasabi	OneIT are the providers of hardware, software and network administration, installation, maintenance and IT support desk services to Spark Education Trust schools. OneIT Staff have permissions-controlled access to this. Autodata/ Wasabi are used for offsite data backup
	pupil identification number	School Performance Management FFT Aspire School Data Company	pupils' attainment to where they should be at various points in their education. We use this information to assess pupils performance.
2	Student ethnicity, language		
3	Student Free school meal eligibility		
6	Assessment information – national curriculum assessment results, teacher assessment		

	results	NFER	
7	Student SEN provision (formerly stage) Student SEN type ranking		
10. 5	First name, photographs and video images shared on school website and social media.	Social Media Twitter Facebook Youtube School Websites Trust Website	Spark Education Trust schools may take photographs or videos for use on the school website/social media. School equipment will be used to take photographs or record images. Retrieve a copy of the Privacy Policies in place here Twitter Privacy Policy Facebook Privacy Policy https://policies.google.com/privacy?hl=en-GB (for google and youtube) We require your explicit consent for processing this data

1	Student personal information – names, gender	School Swimming Lessons Tees Active	All Vision Primary schools work with Tees Active to deliver primary school swimming lessons to meet the National Curriculum. We share the data
2	Pupil ethnicity, language	Swimphony	identified with Tees Active to allow an effective risk assessed swimming lesson.
7	Student SEN provision (formerly stage) Student SEN type ranking		Junction Farm, The Links and Whinstone Primaries share this information securely using a system called Swimphony.

9	Pupil medical information – individual healthcare plans, medication, allergies		Retrieve a copy of the Privacy Policy in place here http://kinetic-insight.com/swimphonylegal/
1	Pupil personal information – names, pupil identification number	Tapestry	Some Spark Education Trust schools track and communicate their child's progress in EYFS with parents by sharing the personal data identified with Tapestry. Retrieve a copy of the Privacy Policy in place here https://tapestry.info/privacy.html
10.1	Photographs and video images (forming part of pupil assessment record)		
1	Pupil personal information – names, pupil identification number	Tempest Photography	We request a photograph of your child for their pupil record to provide appropriate pastoral care, to safeguard pupils and protect their vital interests. Individual photographs are available for sale to parents; we share the data identified with Tempest Photography to enable parents to order photographs online. Retrieve a copy of the Privacy Policy in place here https://www.htempest.co.uk/gdpr We require your explicit consent for processing this data
4	Parent/Carer Contact telephone numbers, email addresses		
1	Pupil personal information – names, , pupil identification number	Specialist teachers, coaches	Spark Education Trust schools provide pupils' access to specialist teachers and coaches to support pupil learning and enrich our curriculum. Some of the personal data identified is shared with specialist teachers and coaches to provide appropriate pastoral care, to safeguard pupils and protect their vital interests Vision has a contract in place with all specialist teachers and coaches that protects personal
7	Pupil SEN provision (formerly stage) Pupil SEN type ranking, provision maps, support plans		

9	Pupil medical information – individual healthcare plans, medication, allergies		information in line with the requirements under GDPR.
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Secondary Schools and Sixth Forms

The personal data we would like to collect from/process about secondary school and sixth form pupils and their families is:

Data Ref	Personal data type:	Source (where Spark Education Trust obtained the personal data from if it has not been collected directly from you, the data subject.):
1	Student personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, unique candidate identifier (UCI), unique learner number (ULN)/ Student school email address, care arrangements, court orders	
2	Student ethnicity, language	
3	Student Free school meal eligibility	Stockton Borough Council/ Redcar & Cleveland Borough Council Confidential Free School Meals Helpline
4	Parent names, contact telephone numbers, email addresses, addresses, relationship to pupil	
5	Attendance information – number of absences, sessions late, absence reasons	
6	Assessment information – qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades, external examination results, teacher assessment results, examination scripts	Teaching Staff, Examination Boards (eAQA, OCR, Pearson EdExcel, WJEC, PetXi, Cache, JCQ, CIE, NCFE, OFQUAL)
7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans	Teaching Staff
8	Behavioural information – e.g. number of temporary exclusions	Head Teacher
9	Student medical information – individual healthcare plans, medication, allergies	
10	Post 16 destinations (education, employment, training) and destinations of those students who leave before the normal leaving age, or mid-year	Teaching Staff
11.0	Photographs and video images (forming part of student assessment record)	Teaching Staff

11.1	Photographs of individual students (taken by Spark Employee kept on pupil record and for ID Badges)	Edukey
11.2	Photographs of individual students (taken by third party for sale to parents)	Tempest Photography
11.3	Photographs of groups of students (taken by third party for sale to parents)	Tempest Photography
11.4	First name, surname, photographs and video images shared on Trust websites and social media	Teaching Staff
11.4a	First name, surname, photographs and video images (used in displays, school publications and printed garments such as hoodies and t-shirts)	Teaching Staff
11.4b	Photographs and video images of individual students and groups of students shared on Trust websites and social media	Simon Hogben Photography
11.5	First name, photographs and video images (in local or national newspapers, televised news programmes or on media website)	
11.6	Eye Movement recordings, Audio Recordings, Test Results	Lexplore
12	Biometric (fingerprint) data	
13	CCTV video surveillance	
14	Telephone Calls	

The personal data we collect will be used for the following purposes:

Data Ref	Personal data type:	Purpose of processing
1	Student personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, unique candidate identifier (UCI), unique learner number (ULN), care arrangements, court orders	To support student learning To monitor and report on student progress To provide appropriate pastoral care
2	Student ethnicity, language	To safeguard the individuals on our premises To assess the quality of our service To maintain school information required by law
3	Student free school meal eligibility	To monitor and report on student progress

		To provide appropriate pastoral care To maintain school information required by law
4	Parent names, contact telephone numbers, email addresses, addresses, relationship to pupil	To provide appropriate pastoral care To safeguard the individuals on our premises To communicate with parents
5	Attendance information – e.g. number of absences and absence reasons	To monitor and report on student progress To provide appropriate pastoral care To safeguard the individuals on our premises To maintain school information required by law
6	Assessment information – qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades, external examination results, teacher assessment results, examination scripts	To monitor and report on student progress To assess the quality of our service To provide appropriate pastoral care To maintain school information required by law
7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans	To monitor and report on student progress To provide appropriate pastoral care To safeguard the individuals on our premises To maintain school information required by law
8	Behavioural information – e.g. number of temporary exclusions	To support student learning To monitor and report on student progress To assess the quality of our service To provide appropriate pastoral care

		To safeguard the individuals on our premises To maintain school information required by law
9	Student medical information – individual healthcare plans, medication, allergies	To provide appropriate pastoral care To safeguard the individuals on our premises
10	Post 16 destinations (education, employment, training) and destinations of those students who leave before the normal leaving age, or mid-year	To assess the quality of our service To maintain school information required by law
11.0	Photographs and video images (forming part of pupil assessment record)	To monitor and report on student progress
11.1	Photographs of individual students (taken by Spark Employee kept on pupil record and for ID Badges)	To provide appropriate pastoral care To safeguard the individuals on our premises
11.4	First name, surname, photographs and video images shared on Trust websites and social media	To communicate with students, parents and the wider community
11.4a	First name, surname, photographs and video images (used in displays, school publications and printed garments such as hoodies and t- shirts)	
11.4b	Photographs and video images of individual students and groups of students shared on Trust websites and social media	
11.5	First name, photographs and video images (in local or national newspapers, televised news programmes or on media website)	
12	Biometric (fingerprint) data	To provide meal service for students
13	CCTV video surveillance	To safeguard the individuals on our premises
14	Phone Call recording	To Safeguard Staff and callers

Our legal basis for processing for the personal data is as follows:

Note: "Article" refers to the section of the UK General Data Protection Regulation (UK GDPR) under which lawful processing is permitted.

Data Ref	Personal data type:	Legal Basis
1	Student personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, unique candidate identifier (UCI), unique learner number (ULN), care arrangements, court orders	Article 6(1)(e) – official authority processing is necessary in the exercise of official authority vested in the controller (Education Act 1996) Article 6(1)(c) – legal obligation Regulation 5 of The Education (Information About Individual Pupils)(England) Regulations 2013
2	Student ethnicity, language	
3	Student free school meal eligibility	
4	Parent names, contact telephone numbers, email addresses, addresses, relationship to pupil	
5	Attendance information – e.g. number of absences and absence reasons	
6	Assessment information – qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades, external examination results, teacher assessment results, examination scripts	
7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans	
8	Behavioural information – e.g. number of temporary exclusions	

7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans	Article 6(1)(c) – legal obligation: Section 100 Children and Families Act 2014 Article 6(1)(d) – vital interest
9	Student medical information – individual healthcare plans, medication, allergies	
6	Assessment information – qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades, external examination results, teacher assessment results, examination scripts	Article 6(1)(c) – legal obligation Regulation 3(1) Part 1 The Education

7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans	(Independent School Standards) Regulations 2014
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4	Parent names, contact telephone numbers, email addresses, addresses	Article 6(1)(d) – to protect the vital interests of the data subject
11.1	Photographs of individual students (taken by Spark Employee kept on pupil record and for ID Badges)	

12	Biometric (fingerprint) data	Article 6(1)(b) – contract to fulfil a contract between parent and caterer
13	CCTV video surveillance	Article 6(1)(e) – public task Section 547 of the Education Act 1996
14	Phone Call recording	

The legitimate interests pursued by us are as follows:

Note: “Article” refers to the section of the UK General Data Protection Regulation (UK GDPR) under which lawful processing is permitted.

Data Ref	Personal data type:	Legitimate interests
4	Parent names, contact telephone numbers, email addresses, addresses	Article 6(1)(f) – legitimate interest To communicate with parents
6	Assessment information – examination scripts	Article 6(1)(f) – legitimate interest To support student learning
6	Assessment information – external examination results	Article 6(1)(f) – legitimate interest To communicate with students, parents and the wider community
11.4a	First name, surname, photographs and video images (used in displays, school publications and printed garments such as hoodies and t- shirts).	Article 6(1)(f) – legitimate interest To communicate with students, parents and the wider community; to celebrate key milestones in our school community.

The special categories of personal data concerned are:

Note: "Article" refers to the section of the UK General Data Protection Regulation (UK GDPR) under which lawful processing of special category data is permitted.

Data Ref	Special categories of personal data:	Lawful basis for processing
2	Student ethnicity, language	Article 9(2)(b) – obligation of the controller authorised by law The data subject may withhold this information at the time of collection if they choose.
7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans	Article 9(2)(b) – obligation of the controller authorised by law
9	Student medical information – individual healthcare plans, medication, allergies	Article 9(2)(b) – obligation of the controller authorised by law
12	Biometric (fingerprint) data	Article 9(2)(a) – explicit consent We require your explicit consent for processing this data

Disclosure

Spark Education Trust has a legal obligation to routinely pass on your personal data to the third parties listed below:

Data Ref	Personal Data Type	Name of Third Party	Purpose of processing
1	Student personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification	Department for Education	• Article 6(1)(c) – legal obligation Regulation 5 of The Education (Information About Individual Pupils)(England) Regulations 2013 Department for Education (DfE) and National Pupil Database (NPD) The Department for Education (DfE) collects personal information from educational settings and local authorities via statutory data collections. Spark Education Trust is

	number, unique candidate identifier (UCI), unique learner number (ULN), care arrangements, court orders	LRS	required by law to provide information about our pupils to the DfE and local authorities under the Education Acts and associated regulations. Some of the information we provide is stored in the National Pupil Database (NPD). The NPD is owned and managed by the DfE and contains information about pupils in schools and colleges in England. The DfE uses information from the NPD to support education policy and the monitoring of educational attainment and outcomes. The DfE may share information from the NPD with organisations that carry out research and analysis, produce statistics, or provide information, advice and guidance where this is permitted by law and subject to appropriate safeguards.
2	Student ethnicity, language		
3	Student free school meal eligibility		
5	Attendance information - e.g.		
	number of absences and absence reasons		The DfE has robust processes in place to ensure that personal data is handled securely and confidentially. Decisions about who can access NPD data are subject to strict approval processes.
6	Assessment information - qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades, external examination results, teacher assessment results		For more information about how the DfE collects and uses personal information, please visit - https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter For information about the National Pupil Database, including the data held and how it is shared, please visit - https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information
7	Student SEN provision (formerly stage) Student SEN type ranking, provision		

	maps, support plans		
8	Behavioural information – e.g. number of temporary exclusions		
1-8	Personal Data Type 1-8 listed above	Destination School	• Article 6(1)(e) – official authority processing is necessary in the exercise of official authority vested in the controller (Education Act 1996) • Article 6(1)(c) – legal obligation Regulation 5 of The Education (Information About Individual Pupils)(England) Regulations 2013 Your child's destination school will have its own Privacy Policy.
4	Parent names, contact telephone numbers, email addresses, addresses, relationship to pupil		
1-8	Personal Data Type 1-8	Local Authority Authorities and those responsible for looked after or previously looked after children Post 16	• Article 6(1)(c) – legal obligation • Section 175 Education Act 2002 places a duty on both the Education Provider and the LA to safeguard and promote the welfare of children. Education Act 1996 Section 436A imposes a duty on the LA to identify and monitor children missing education. • Education Act 1996 Section 444 places responsibilities on the LA in terms of enforcing student attendance. • Exclusion from maintained schools, academies and pupil referral units in England 2017 Education Providers are obliged by its funding agreement to follow current law and DfE advice on Exclusions.

		Destinations and Education Providers Welfare Call ASSET for Education	Education Act 1996 Section 507B – responsibilities in relation to the education or training of 13-19 year olds.
1-10	Personal Data Type 1-10	Microsoft Google Adobe Groupcall HCSS – Access Group	These are the operating systems used within the Trust to create, store and share documents. Wasabi is used for off site backups.

		<u>Students aged 13+</u> When a student turns 13 we pass on personal information to youth support services and careers advisers. <u>Students aged 16+</u> Student details are also provided to post-16 education and training providers. A parent can request that only their child's name, address and date of birth is passed to the local authority in these circumstances by informing the Data Protection Officer. <u>Post 16</u> This right is transferred to the student once he/she reaches the age 16. Your child's destination school/ college will have its own Privacy Policy. Retrieve a copy of the Local Authority Privacy Policies in place here Middlesbrough Council's Privacy Policy Stockton Borough Council's Privacy Policy Redcar & Cleveland Privacy Policy Cumbria Council Privacy Policy Welfare Call is used to collect the attendance of pupils classified as being a looked after child. Welfare Call - Privacy Notice ASSET for Schools is used to collect the attendance of pupils classified as being a looked after child. ASSET Privacy Notice
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Data Ref	Personal Data Type	Name of Third Party	Purpose of processing

9	Pupil medical information – individual healthcare plans, medication, allergies	Caterlink Middlesbrough & Stockton on Tees Council Catering	We share the data identified with our catering providers to cater to individual dietary requirements.
1-10	Personal Data Type 1-10	Capita SIMS	Arbor is replacing Capita SIMS as our electronic management information system and contains the majority of our student records. Capita Privacy Notice Arbor Privacy Notice Staff have permissions-controlled access to this. Edukey Privacy Notice Evolve Privacy Policy Evolve is used to facilitate educational visits and school trips.
11.1	Photographs of individual students (taken by Vision Employee kept on pupil record and for ID Badges)	Arbor	
		Edukey (TES) Evolve	
4	Parent names, contact telephone numbers, email addresses, addresses, relationship to pupil	Aim High Attendance – (previously A Star Attendance)	Aim High Attendance provide pupil attendance monitoring services to schools. Please contact Aim High Attendance for a copy of their privacy notice.
5	Attendance information – e.g. number of absences and absence reasons	Attend	Data Protection Policy.pdf (attending.school)
1-9	Personal Data Type 1-9	CPOMS	CPOMS is our child protection online management information system and contains the majority of our student records including behaviour, welfare and medical records. Staff have permissions-controlled access to this.
1	Personal Data Type 1 Name, Date of Birth, Postcode, Year Group, Level of study, school/institution name/ course, Gender,	COMPASS+	COMPASS+ has access to the minimum Personally Identifiable Information as is necessary to build and maintain the system. Only pseudonymised data (replacing most identifying fields within a data record by one or more artificial identifiers, or pseudonyms) will otherwise be viewed by staff.. Student email fields will be included in the data transferred to Compass+ from 05.11.2022 Staff have permissions-controlled access to this.

	Ethnicity/Student school email address		
1	Personal Data Type 1 Name, Date of Birth, Postcode, Year Group,	One Vision	One Vision is a pilot scheme involving a number of selected pupils. Names will be anonymized before being shared with One Vision.
	Level of study, school/institution name/ course, Gender, Ethnicity		
1	Personal Data Type 1 Name, Date of Birth, Postcode, Year Group, Level of study, school/institution name/ course, Gender, Ethnicity	Progress Careers – previously Careers Inc	A service to provide information, advice and guidance on careers. CV's of applicants and overall generalised destination information.
1	Personal Data Type 1 Name, Date of Birth, Postcode, Year Group, Level of study, school/institution name/ course, Gender, Ethnicity	Future Me	North East Uni Connect Programme (NEUCP) is a group of all colleges and universities in the North East of England working together to help young people think about their futures and how higher education can help them reach their goals.
1	Student personal information – Legal Forename and Surname, Middle names, gender, DOB, Candidate Number, ULN, UCI, year group	Exam Boards eAQA, OCR, Pearson EdExcel, WJEC. PET-Xi, CACHE, JCQ, NCFE,	The exam boards require us to provide this information in order for the exams to be successfully administered. Please note that Legal Forename and Surname are the details that appear on the birth certificate. We are not permitted to share shortened versions of these names. Exam Boards require information for all students sitting public

6	Assessment information – qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades	CIE	examinations; this is likely to be students in Years 10, 11, 12 and 13. Staff have permissions-controlled access to this.
1,6	Personal data 1 and 6 as above plus	Exam Boards (Special	For students needing special consideration, we would also share brief details of the situation / medical condition leading to disadvantage during exams or coursework. Staff have permissions-controlled access to this.
7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans	Considerations) eAQA, OCR, Pearson EdExcel, WJEC, PET-Xi, CACHE, JCQ, NCFE,	
9	Student medical information	CIE	
1	Student personal information – Legal Forename and Surname, Middle names, gender, DOB, Candidate Number, ULN, UCI, year group	Exam Boards (Moderation) eAQA, OCR, Pearson EdExcel, WJEC, PET-Xi, CACHE, JCQ, NCFE, CIE	Information is shared with the Exam Boards to enter and coursework for external examinations. This information may also be shared with individual moderators from each Exam Board. Staff have permissions-controlled access to this.
6	Assessment information – qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades, teacher assessment results		
11.	Photographs and video images (forming part of student assessment record)		

1	Student personal information – Legal Forename and Surname, Middle names, gender, DOB, Candidate Number, ULN, UCI, year group	Exam Boards (Post Results Services) eAQA, OCR, Pearson EdExcel, WJEC, PET-Xi, CACHE, JCQ, NCFE, CIE	This information is shared with Exam Boards in the event of students' enquiries about results or where they request access to scripts. Staff have permissions-controlled access to this.
6	Assessment information – qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades, teacher assessment results		
1	Student personal information – Legal Forename and Surname, Middle names, gender, DOB, Candidate Number, ULN, UCI, year group	Exam delivery system – Certiport	The IC3 Spark Certificate (an IT exam) is completed via an online system – PearsonVUE Certiport Console 8. The data centre is located in the USA. The data of students sitting this exam will be transferred outside the European Economic Area (EEA) Some of our approved third-party service providers may process personal information outside the United Kingdom. Where this occurs, Spark Education Trust will ensure that appropriate safeguards are in place, including the UK-US Data Bridge (where applicable), the UK International Data Transfer Agreement (IDTA), the UK Addendum to the Standard Contractual Clauses (SCCs), or other lawful transfer mechanisms recognised under UK GDPR. PearsonVue Privacy Policy
6	Assessment information – qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades		

1	Student personal information – names,	ePraise	
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	pupil identification number		Spark Education Trust schools track and communicate their child's progress with parents by sharing the personal data identified with ePraise.
11.	Photographs and video images (forming part of student assessment record)		Retrieve a copy of the Privacy Policy in place https://www.epraise.co.uk/index.php?view=privacy
1	Student personal information – names, date of birth, gender, pupil identification number	FFT Aspire	We share information with FFT Aspire to enable us to calculate students' KS2 scores to where the student should be at various points in their education. We use this information to assess ourselves.
2	Student ethnicity, language, ,		
3	Student Free school meal eligibility		
6	Assessment information examination results, teacher assessment results		
7	Student SEN provision (formerly stage) Student SEN type ranking		

1	Student personal information – names, , pupil identification number, username, profile picture	Learning Platform/Resource Providers Accelerated Reader Bebras Computing Challenge GlobalBridge Kerboodle Lexia MicroLibrarian Systems My GCSE Science UK Rocketry Association (UKRA) Show My Homework Snakify.org Yacapaca Adobe CC Sketchup Mathswatch PIXL VLeBooks Pearson ActiveHub 4Matrix ASDAN ASSET for Schools (Raise Online) Class Charts Clickview Daydream Education Hegarty Maths Tassomai Wonde Times Tables Rockstars Seneca Learning Iachieve Vocab Express Marvellous Me White Rose Maths	Spark Education Trust provide students and parents access to a number of learning platforms and resources to support student learning using the personal data identified. Retrieve a copy of the Privacy Policies in place by viewing the Privacy Policy for each learning platform / resource provider: Accelerated Reader Privacy Policy Bebras Computing Challenge GlobalBridge Privacy Policy Kerboodle Privacy Policy Lexia Core Privacy Policy MicroLib Privacy Policy My GCSE Science Privacy Policy UKRA Privacy Policy Show My Homework Privacy Policy Snakify Yacapaca Privacy Policy Adobe CC Privacy Policy Sketchup Privacy Notice Mathswatch Privacy Policy PIXL Privacy Policy VL eBooks Privacy Notice Pearson ActiveHub Privacy Notice 4matrix.org Privacy Notice ASDAN Privacy Notice Asset for Schools Privacy Notice Class Charts Privacy Notice Clickview Privacy Notice Daydream Privacy Policy Hegarty Maths Privacy Policy Tassomai Privacy Policy Wonde Privacy Policy Times Tables Rockstars Privacy Policy Seneca Learning Ltd Privacy Notice Vocab Express Privacy Notice Marvellous Me Privacy Notice White Rose Maths Privacy Notice
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		Bandlab Bedrock Plex Lexplore Educake Thrive Book Creator Language Gym Robotmesh & Flowol TES Global – Python Programming Kahoot! Hodder – MARK & SNAP CleverLili Rising Stars Duolingo Quizlet Memrise Sparx Maths Carousel Doublestruck ZigZag Quizwiz Tinkercad Canva Unifrog Education Limited Isaac Science Know it all ninja picoCTF MBop Code.org Nisai Learning	Bandlab Privacy Notice Bedrock Privacy Notice Lexplore Privacy Notice Educake Privacy Notice Thrive - Privacy Policy Book Creator Privacy Policy Language Gym Privacy Notice Robotmesh & Flowol Privacy Policy TES - Python Programming Privacy Notice Kahoot! Privacy Notice Hodder Education Privacy Notice Clever Lili Privacy Policy Hodder Education Privacy Notice Duolingo Privacy Notice Quizlet Privacy Policy Memrise Privacy Policy Sparx Maths Privacy Notice Carousel Privacy Policy Doublestruck Privacy Notice ZigZag Education's Privacy Policy QuizWiz Privacy Policy Canva Privacy Policy Unifrog Privacy Notice Isaac Science Privacy Notice Know it all ninja privacy notice picoCTF Privacy Notice mbop Privacy Notice code.org Privacy Notice Nisai Learning Privacy Notice
1	Student personal information – names, date of birth, gender, pupil identification number	LearningPlusUK GL Assessment & Cat 4 Testing No More Marking Reciprocal Reading	We share information with LearningPlus UK to enable us to calculate students' assessment scores to where the student should be at various points in their education. We use this information to track progress and assess our provision.

2	Student ethnicity, language, ,	FFT Literacy NTP	GL Assessment, NGRT & CAT 4 Testing and No More Marking are used to benchmark students. Reciprocal Reading Project (in association with Queens University Belfast) is used to identify individuals that may benefit from reciprocal reading provided by FFT Literacy. National Tutoring Programme (NTP) & My Tutor – used to provide tutoring to pupils.
3	Student Free school meal eligibility	My Tutor	
6	Assessment information examination results, teacher assessment results		
7	Student SEN provision (formerly stage) Student SEN type ranking		
1	Student personal information – names, date of birth, gender	CIVICA	Spark Education Trust schools operate a cashless catering system. We share the data identified with NRSLtd to create numerical IDs from fingerprints to manage our cashless catering system. We require your explicit consent for processing this data
12	Biometric (fingerprint) data		
1	Student personal information – names, date of birth, gender, contact telephone numbers, addresses, next of kin, pupil identification number, care arrangements	NHS and other support services	We may refer your child to an NHS service such as speech and language, occupational health and Child & Adolescent Mental Health Services. We may also refer your child to access other support services such as Educational Psychology, counselling, family therapy and play therapy. We will tell you before we process this information.
2	Student ethnicity, language		
4	Parent names, contact telephone numbers, email addresses, addresses, relationship to pupil		
5	Attendance information – e.g. number of absences and absence reasons		
7	Student SEN provision (formerly stage) Student SEN type ranking,		
	provision maps, support plans		
8	Behavioural information – e.g. number of temporary exclusions		
9	Student medical information – individual healthcare plans, medication, allergies		

1	Student personal information – names, pupil identification number, gender	ParentMail Parent Pay Schoolcomms, School Gateway School Cloud	Spark Education Trust Schools use ParentMail & Parent Pay or School Comms & Gateway as a platform to communicate with parents and facilitate payment of trips and activities on our behalf. We share the personal information identified to set users up on the system. School Cloud is used to facilitate remote parents evening. Retrieve a copy of the Privacy Policy in place here Parentmail Privacy policy ParentPay Privacy Policy School Comms & Gateway Privacy Notice School Cloud Parents Evening Privacy Notice
4	Parent names, contact telephone numbers, email addresses, relationship to pupil		
6	Assessment information – external examination results	School Websites	Spark Education Trust schools will publish selected student external examination results on their school websites. They will be published in surname order.
11.4	First name, surname, photographs and video images (used in displays, school publications, shared on school website and social media) Username	Social Media Twitter Facebook YouTube School Websites Trust Website	Spark Education Trust schools may take photographs or videos for use on the school website/social media. School equipment will be used to take photographs or record images. Retrieve a copy of the safeguards in place here Twitter Privacy Policy Facebook Google & You Tube We require your explicit consent for processing this data
11.4b	Photographs and video images of individual students and groups of students	The Friends of Egglecliffe School Music website and social media	Spark Education Trust schools may take photographs or videos for use on the school website/social media and for sharing on the Friends of Egglecliffe School Music website/social media.
1	Student personal information – names, pupil identification number	Duke of Edinburgh	Only applicable to Individuals choosing to participate in the Duke of Edinburgh Award Scheme We require your explicit consent for processing this data
9	Student medical information – individual healthcare plans, medication, allergies		
1	Student personal information – names, pupil identification number	Tempest Photography	Individual photographs are available for sale for the personal, private use of parents; we share the data identified with Tempest Photography to enable parents to order photographs online. Retrieve a copy of the Privacy Policy in place here https://www.htempest.co.uk/gdpr We require your explicit consent for processing this data
4	Parent Contact telephone numbers, email addresses		

1	Student personal information – names, pupil identification number	Specialist teachers, coaches	Spark Education Trust schools provide students' access to specialist teachers and coaches to support student learning and enrich our curriculum. Some of the personal data identified is shared with specialist teachers and coaches to provide appropriate pastoral care, to safeguard students and protect their vital interests.
7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans		
9	Student medical information – individual healthcare plans, medication, allergies		
6	Assessment information – qualifications being entered for and relevant unit codes and tier of entry, coursework marks or grades, external examination results, teacher assessment results	UCAS	Students self-register on the UCAS website and input all their own data, however sixth form staff can view the information they have input and can verify examination results. Teaching staff will also provide an academic reference for students on the site. Retrieve a copy of the Privacy Policy in place here UCAS Privacy Notice
1	Student personal information – names, pupil identification number	National Tutoring Programme	The National Tutoring Programme (NTP) will provide additional support to schools to help disadvantaged pupils whose education has been most affected by school closures.
7	Student SEN provision (formerly stage) Student SEN type ranking, provision maps, support plans		
1	Student personal information – names, pupil identification number	Lexplore	Lexplore is a tool to measuring reading attainment and provide intervention where necessary. We require your explicit consent for processing this data
11.6	Eye Movement recordings, Audio Recordings, Test Results		

Workforce, Governors & Visitors

The personal data we would like to collect from/process about our Workforce is:

Data Ref	Personal data type:	Source (where Spark Education Trust obtained the personal data from if it has not been collected directly from you, the data subject.):
1	Personal information – Name, Address, Date of Birth, Home Address.	
2	Personal contact details - Personal email address, Personal telephone numbers	
2a	Online searches for shortlisted candidates in accordance with Keeping Children Safe in Education (KCSIE)	To comply with recommended online checks. Searches are limited to publicly available information and are undertaken to identify any issues that may be relevant to an applicant's suitability to work with children or in a position of trust. The lawful basis for processing this information is Article 6(1)(c) UK GDPR (Legal Obligation) and Article 6(1)(e) UK GDPR (Public Task). Information obtained through online searches will only be used where relevant to the recruitment process and will be handled in accordance with UK data protection legislation.
3	Application form, Teacher Reference Number (TRN) Qualifications, Training, CV	
4	References	References are provided by the Referees identified by data subject
5	Gender, age, ethnicity, nationality, country of birth, marital status, sexuality, trade union membership, disability (equal opportunities monitoring)	Where the Trust processes information relating to trade union membership, this is treated as special category personal data and is processed only where permitted by UK GDPR and the Data Protection Act 2018. This information is used for employment, payroll and employee relations purposes and is subject to appropriate safeguards.
6	Health records – health declaration, occupational health reports and associated documents	Initial health declaration by data subject
7	Work permit	
8	DBS clearance number	Disclosure Barring Service

9	Proof of identity documents (passport, marriage/birth certificate, driving license, utility bills etc.)	
10	Emergency Contact Details/Next of kin names, contact telephone numbers, email addresses, addresses	
11	Bank account details Tax/NI Reference	Spark Payroll provider
12	Photograph (taken by third party or employee, for ID Badge and staff record)	Third party photographer/Spark Employee
13	Payroll information: employment start date, employment term, salary, Payroll Number, Pension number, Trade Union Membership	
14	Attendance information – number of absences, absence reasons, leave requests and associated documents	
15	Timesheets, mileage	
16	Performance Management information – appraisal, disciplinary and associated documents	Line Manager
17	CPD information – in work training	
18	Biometric (fingerprint) data	
19	CCTV video surveillance	
20	Audio – Recordings of telephone calls	

The personal data we collect will be used for the following purposes:

Data Ref	Personal data type:	Purpose of processing:
1	Personal information – Name, Address, Date of Birth, Home Address.	Recruitment to a post Contract of Employment

		To maintain school information required by law
2	Personal contact details - Personal email address, Personal telephone numbers	Recruitment to a post Appointment to post
2a	Social Media Handles	Recruitment to a post Appointment to post
3	Application form, Teacher Reference Number (TRN) Qualifications, Training, CV	Recruitment to a post To maintain school information required by law
4	References	Recruitment to a post
5	Gender, age, ethnicity, nationality, country of birth, marital status, sexuality, trade union membership, disability (equal opportunities monitoring)	Recruitment to a post
6	Health records – health declaration, occupational health reports and associated documents	Pre-employment checks To maintain school information required by law
7	Work permit	Pre-employment checks To maintain school information required by law
8	DBS clearance number	Pre-employment checks To maintain school information required by law
9	Proof of identity documents (passport, marriage/birth certificate, driving license, utility bills etc.)	Pre-employment checks To maintain school information required by law
10	Emergency Contact Details/Next of kin names, contact telephone numbers, email addresses, addresses	Appointment to post
11	Bank account details Tax/NI Reference	Appointment to post
12	Photograph (taken by third party or employee, for ID Badge and staff record)	Appointment to post
13	Payroll information: employment start date, employment term, salary, Payroll Number, Pension number, Trade Union Membership	Payment of salary and deductions To maintain school information required by law

14	Attendance information – number of absences, absence reasons, leave requests and associated documents	Payment of salary and deductions Staff management To maintain school information required by law
15	Timesheets, mileage	Payment of salary and deductions
16	Performance Management information – appraisal, disciplinary and associated documents	Staff management
17	CPD information – in work training	Staff management
18	Biometric (fingerprint) data	To provide meal service for staff
19	CCTV video surveillance	To safeguard the individuals on our premises
20	Audio – Recordings of telephone calls	To safeguard the individuals on our premises

Our legal basis for processing for the personal data is as follows:

Note: “Article” refers to the section of the UK General Data Protection Regulation (UK GDPR) under which lawful processing is permitted.

Data Ref	Personal data type:	Legal Basis
1	Personal information – Name, Address, Date of Birth, Home Address	Article 6(1)(c) – legal obligation Keeping children safe in education 2025 & 2026, (Statutory Guidance from Dept. of Education) Sections 86 – 144)
2	Personal contact details – Personal email address, Personal telephone numbers	
3	Application form, Teacher Reference Number (TRN) Qualifications, Training, CV	
4	References	
6	Health records – health declaration, occupational health reports and associated documents	
7	Work permit	
8	DBS clearance number	

9	Proof of identity documents (passport, marriage/birth certificate, driving license, utility bills etc)	
12	Photograph (taken by third party or employee, for ID Badge and staff record)	
1	Personal information – Name, Address, Date of Birth, Home Address	
13	Payroll information: employment start date, employment term, salary	Article 6(1)(b) – contract to fulfil a contract of employment
11	Bank account details Tax/NI Reference	
14	Attendance information – number of absences, absence reasons, leave requests and associated documents	
15	Timesheets, mileage	
10	Emergency Contact Details/Next of kin names, contact telephone numbers, email addresses, addresses	Article 6(1)(d) – to protect the vital interests of the data subject
5	Gender, age, ethnicity, nationality, country of birth, marital status, sexuality, trade union membership, disability (equal opportunities monitoring)	Article 6(1)(c) – legal obligation The Equality Act 2010 Part 5
18	Biometric (fingerprint) data	• Article 6(1)(b) – contract to fulfil a contract between employee and caterer
19	CCTV video surveillance	Article 6(1)(e) – official authority Section 547 of the Education Act 1996
20	Telephone call recordings	Article 6(1)(d) – to protect the vital interests of the data subject

The legitimate interests pursued by us are as follows:

Note: “Article” refers to the section of the UK General Data Protection Regulation (UK GDPR) under which lawful processing is permitted.

Data Ref	Personal data type:	Legitimate interests

16	Performance Management information – appraisal, disciplinary	Article 6(1)(f) – legitimate interest To monitor the progress, develop, evaluate and support employees
17	CPD information – in work training	

The special categories of personal data concerned are:

Note: “Article” refers to the section of the UK General Data Protection Regulation (UK GDPR) under which lawful processing of special category data is permitted.

Data Ref	Special categories of personal data:	Lawful basis for processing
5	Ethnicity, nationality, country of birth, marital status, sexuality, trade union membership, disability (equal opportunities monitoring)	Article 9(2)(b) – obligation of the controller authorised by law (The Equality Act 2010 Part 5) This information is collected anonymously. The data subject may withhold this information at the time of collection if they choose.
6	Health records – health declaration, occupational health reports and associated documents	Article 9(2)(b) – obligation of the controller authorised by law (The Education (Health Standards)(England) Regulations 2003)
9	Proof of identity documents (passport, marriage/birth certificate)	Article 9(2)(b) – obligation of the controller authorised by law Keeping children safe in education, 2025&2026 (Statutory Guidance from Dept. of Education) Sections 86 – 144)
14	Attendance information – number of absences, absence reasons, leave requests and associated documents	Article 9(2)(b) – obligation of the controller in the field of employment in calculating occupational pay rights (ie statutory sick pay, maternity pay)
13	Payroll information: Trade Union Membership	Article 9(2)(b) – obligation of the controller field of employment, in the payment of Trade Union fees deducted from salary only. Data subjects may wish to arrange their own Trade Union membership and payment away from Payroll.
18	Biometric (fingerprint) data	Article 9(2)(a) – explicit consent We require your explicit consent for processing this data

Consent

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

Most of the personal information we process is necessary for us to fulfil our statutory duties as an academy trust and does not require consent. Where consent is relied upon, this will be made clear and explicitly obtained. Consent may be withdrawn

at any time. Where we are asking you for sensitive personal data, we will always tell you why and how the information will be used.

The personal data that requires your **explicit consent** for processing is as follows:

Data Ref	Personal data type:	Purpose of processing where Article 6(1)(a) – consent is explicitly required
2a	Social Media Handles	Social media handles provided by short listed candidates will enable reasonable online checks to be carried out prior to interview to enable discussions around any safeguarding or reputational concerns highlighted that are publicly available.
5	Ethnicity, nationality, country of birth, marital status, sexuality, trade union membership, disability (equal opportunities monitoring)	The monitoring of applications for the purpose of equal opportunities is a practice recommended by the Equality and Human Rights Commission. Spark Education Trust as an employer is obliged by the Public Sector Equalities Duty to uphold the Equalities Act 2010. This information is collected at the point of a job application and is submitted anonymously. An applicant may choose to withhold this information if they wish.
18	Biometric (fingerprint) data	Spark schools use biometric data to operate our cashless catering system. Staff are identified by a biometric system which reads their fingerprint. Our system uses an image of the fingerprint to create a mathematical algorithm and then discards the fingerprint; only the numbers remain and these cannot be re-interpreted back into a fingerprint image

Consent for the above personal data is given at the time of collecting the information on the application for employment form and at the time of setting up cashless catering.

Sign In App

To help ensure the safety and security of our pupils, staff, visitors, and premises, the Trust uses an electronic visitor sign in system called Sign In App. When you sign in, we may collect your name, organisation (where applicable), vehicle registration (if required), the person you are visiting, and the date and time of your visit. We use this information to manage access to our sites, maintain accurate records of visitors, support emergency evacuation procedures, meet our safeguarding and health and safety responsibilities and investigate security incidents where necessary. This information is processed in accordance with UK data protection legislation and is retained only for as long as necessary in line with the Trust's records retention schedule. Link to: [Sign In App Privacy Notice](#)

International Transfers

Some of the organisations that provide services to Spark Education Trust process personal information outside of the United Kingdom. This may occur where a supplier stores data in another country, provides support services from overseas or uses cloud-based infrastructure located outside the UK.

Where personal data is transferred outside the UK, Spark Education Trust will ensure that appropriate safeguards are in place to protect the information and to ensure that it continues to benefit from a level of protection that is essentially equivalent to that provided under UK data protection law.

The safeguards used may include –

- A transfer to a country that has been recognised by the UK Government as providing an adequate level of protection for personal data.
- The use of the UK International Data Transfer Agreement (IDTA).
- The use of the UK Addendum to the European Commission's Standard Contractual Clauses (SCCs).
- Transfers made under the UK-US Data Bridge where the receiving organisation participates in the scheme.
- Other lawful transfer mechanisms permitted under Chapter V of the UK General Data Protection Regulation (UK GDPR).

A number of the Trust's education, communication and business systems may involve international processing, including providers of cloud services, educational software, communication platforms, online learning resources and website services. Examples may include Microsoft 365, Google Workspace for Education, Canva, Adobe and other approved educational technology providers used by the Trust.

Before engaging any supplier that processes personal data outside the UK, the Trust undertakes appropriate due diligence and seeks assurances regarding the security and lawful processing of personal information.

Further information about international transfers undertaken by individual suppliers can be found within the privacy notices of those organisations. Copies of relevant safeguards may be obtained by contacting the Trust's Data Protection Officer.

Retention Period

Spark Education Trust retains personal information only for as long as necessary to fulfil the purposes for which it was collected and to meet legal, regulatory and operational requirements.

The Trust follows its Records Retention Schedule, which is based on guidance published by the Information and Records Management Society (IRMS), the Department for Education and other relevant regulatory bodies. Retention periods are reviewed periodically and may vary depending on the type of record held.

This includes, but is not limited to, pupil records, safeguarding records, SEND records, personnel files and CCTV recordings.

Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.

- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling. Spark Education Trust does not make solely automated decisions which produce legal or similarly significant effects.
- Right to complain – if you have concerns about the way Spark Education Trust has collected or used your personal information, we would ask that you raise your concern with us in the first instance by contacting the Data Protection Officer. You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK's independent authority for data protection issues, details of which are below-

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Telephone: 0303 123 1113

Website: www.ico.org.uk

You may make a complaint to the ICO at any time although the ICO generally recommends that you raise your concern with the organisation concerned first.

All of the above requests will be forwarded on should there be a third party involved in the processing of your personal data.