

FOOTSTEPS TRUST GDPR STUDENT AND PARENT PRIVACY NOTICE

Introduction

Footsteps Trust is committed to protecting the privacy, confidentiality and security of personal information.

This Privacy Notice explains how we collect, use, store and share personal information relating to:

- Students
- Parents and carers
- Prospective students
- Former students

The notice complies with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Education Act 1996
- Keeping Children Safe in Education (KCSIE) 2026
- Independent School Standards
- Working Together to Safeguard Children

The Academy recognises that effective information management supports education, safeguarding and student wellbeing.

1. Data Controller

Footsteps Trust is the **Data Controller** for the personal information we hold about students and parents/carers.

The Academy is responsible for deciding:

- What information is collected.
- How information is used.
- Who information is shared with.
- How information is stored and protected.

2. Categories of Information We Collect

We may collect, store and process:

Student Information

- Full name
- Date of birth
- Unique student identifiers
- Gender
- Contact details
- Address
- Nationality
- Language information

Parent and Carer Information

- Names
- Contact details
- Relationship to the student
- Emergency contacts

Educational Information

- Attendance records
- Assessment information
- Examination results
- Academic progress
- Behaviour records
- Reintegration information
- Referral information

Safeguarding Information

- Child protection records
- Welfare information
- Early Help records
- Attendance concerns
- Risk assessments
- Multi-agency involvement

SEND Information

- EHCPs
- SEND support plans
- Specialist assessments
- Professional reports

Medical Information

- Health conditions
- Allergies
- Medication requirements
- Mental health information where relevant

Technical Information

- Academy IT usage
- Filtering and monitoring records
- Online safety records
- Network security records

Images and Recordings

- Photographs
- CCTV images
- Educational recordings
- Academy event photographs

3. Why We Collect and Use Information

The Academy uses personal information for:

Education and Learning

- Deliver education.
- Assess progress.
- Plan support.
- Monitor attainment.
- Enter students for examinations.

Safeguarding

- Protect children from harm.
- Assess risk.
- Share safeguarding information where necessary.
- Comply with child protection responsibilities.

Attendance and Welfare

- Monitor attendance.
- Support student wellbeing.
- Work with families and external agencies.

SEND and Inclusion

- Provide appropriate support.
- Make reasonable adjustments.

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- Deliver EHCP provision.

Communication

- Contact parents and carers.
- Provide reports and updates.
- Manage emergency situations.

Legal and Regulatory Duties

- Meet statutory requirements.
- Submit required information to government bodies.
- Cooperate with inspections and audits.

Security

- Protect students, staff and visitors.
- Operate CCTV systems.
- Maintain cyber security.
- Operate filtering and monitoring systems.

Careers and Post-16 Support

- Support progression planning.
- Track destinations.
- Facilitate careers guidance.

4. Lawful Bases for Processing

Under UK GDPR, the Academy processes personal information using one or more of the following lawful bases:

Public Task

Where processing is necessary to carry out the Academy's educational functions.

Legal Obligation

Where processing is required by law.

Vital Interests

Where processing is necessary to protect someone's life or wellbeing.

Contract

Where processing is necessary to fulfil contractual arrangements.

Legitimate Interests

Where processing is necessary for the legitimate operation of the Academy.

Consent

Where consent is specifically required.

Where consent is used, it may be withdrawn at any time.

5. Special Category Data

The Academy may process sensitive information including:

- Health information
- Ethnicity
- Religion or belief
- SEND information
- Biometric information (where applicable)
- Safeguarding records

Such information is processed only where lawful and necessary and with appropriate safeguards in place.

6. Who We Share Information With

The Academy may share information where appropriate with:

Department for Education (DfE)

Including information required through statutory data collections.

Local Authorities

Including:

- Attendance services
- SEND teams
- Virtual Schools
- Alternative Provision commissioners

Schools and Educational Providers

Where students move schools or access educational programmes.

Safeguarding Agencies

Including:

- Children's Social Care
- Police
- Multi-Agency Safeguarding Hubs (MASH)
- Local Authority Designated Officers (LADO)

Health Services

Including:

- NHS services
- CAMHS
- School nursing services
- Health professionals

Careers and Post-16 Providers

To support post-16 progression and destination planning.

Professional Advisers

Including legal, insurance and professional support services.

7. Safeguarding Information Sharing

The Academy recognises that safeguarding information sharing is critical.

In accordance with KCSIE 2026:

- Information may be shared without consent where necessary to safeguard a child.
- Protection of children takes precedence over data protection concerns where significant harm is a risk.
- Relevant information will be shared promptly with safeguarding partners when required.

8. Filtering and Monitoring

To comply with safeguarding responsibilities, the Academy operates:

- Web filtering systems.
- Network monitoring systems.
- Cyber security controls.
- Online safety monitoring arrangements.

Information generated through these systems may be reviewed where necessary to:

- Protect students.
- Investigate safeguarding concerns.
- Respond to cyber security risks.
- Maintain safe use of Academy systems.

This monitoring is proportionate and carried out for safeguarding and security purposes.

9. CCTV and Photography

The Academy uses CCTV for:

- Safeguarding
- Security
- Health and safety
- Crime prevention

Photographs and videos may also be used for educational and promotional purposes.

Appropriate permissions will be sought where required.

Images will never knowingly be used in a way that places a student at risk.

10. International Transfers

The Academy will only transfer personal data outside the United Kingdom where:

- Appropriate safeguards are in place.
- UK GDPR requirements are met.
- Adequate protection of personal information can be assured.

11. How Long We Keep Information

Information is retained in accordance with the Academy's:

[Data Records, Document Storage and Retention Policy](#)

Retention periods vary depending on:

- Legal requirements
- Safeguarding responsibilities
- Educational needs
- Regulatory requirements

12. Security of Information

The Academy uses appropriate security measures to protect information, including:

- Secure networks
- Encryption where appropriate
- Access controls
- Staff training
- Cyber security systems

- Secure record storage

Personal information is only accessible to authorised individuals.

13. Student and Parent Rights

Under UK GDPR, individuals have rights including:

- The right to be informed.
- The right of access.
- The right to rectification.
- The right to erasure (in certain circumstances).
- The right to restrict processing.
- The right to object.
- Rights relating to automated decision-making.
- The right to complain.
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14. Subject Access Requests

Parents, carers and students may request access to personal information held by the Academy.

Requests should be submitted to the Academy's Data Protection Lead.

The Academy will normally respond within the statutory timescales set out in UK GDPR legislation.

15. Complaints

If you are unhappy with how your personal information is being handled, you should first contact the Academy.

You may also contact:

Information Commissioner's Office (ICO)

www.ico.org.uk

The ICO is the UK's independent authority for data protection matters.

16. Data Protection Officer

The Academy has appointed a Data Protection Officer (DPO) to oversee compliance with data protection legislation.



Review

This Privacy Notice will be reviewed:

- Annually.
- Following changes in legislation.
- Following significant changes to Academy systems.
- Following updates to safeguarding guidance.