



Policy: Privacy Notice for Pupils

Legal Status:

Statutory

Updated:

June 2026

Adopted:

June 2024

Next Review:

2028

Responsible SLT:

SOA/LW

Claremont High School Academy's Data Protection Lead:

Mr Adam Skordi

datateam@claremont-high.org.uk

Sudbury Primary School's Data Protection Lead:

Mr Luke Webber

dpl@sudburyprimary.co.uk

We have carefully considered and analysed the impact of this policy on equality and the possible implications for staff or pupils with protected characteristics, as part of our commitment to meet the Public Sector Equality Duty (PSED) requirement to have due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations. By shading this box green, we, the policy holders, are confirming that we have read the Mat Equality Policy and the Equality Act 2010

Privacy Notice (How we use pupil information)

We collect and hold personal information relating to our pupils and may also receive information about them from their previous school, local authority, and/or the Department for Education (DfE). We use this personal data to:

- support our pupils' learning
- monitor and report on their progress
- provide appropriate pastoral care; and
- assess the quality of our services

This information will include their contact details, national curriculum assessment results, attendance information, any exclusion information, where they go after they leave us and personal characteristics such as their ethnic group, any special educational needs they may have as well as relevant medical information.

The categories of pupil information that we collect, hold and share include:

- Personal information (such as name, unique pupil number and address)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Assessment information
- Relevant medical information
- Special educational needs information
- Exclusions / behavioural information
- Pupils enrolling for post 14 qualifications, the Learning Records Service will give us the unique learner number (ULN) and may also give us details about your learning or qualifications.

The lawful basis on which we use this information

We collect and use pupil information under the following lawful basis;

Legal obligation: the processing is necessary for the school to comply with the law (not including contractual obligations), for example statutory DfE census returns.

Public task: the processing is necessary for the school to perform a task in the public interest or for the school's official functions, and the task or function has a clear basis in law, for example reporting academic progress to parents. Legal obligation, and legitimate interests under UK GDPR Article 6. Special category data processed under Article 9 conditions (substantial public interest, safeguarding).

Legitimate interests: the processing is necessary for the school's legitimate interests or the legitimate interests of a third party unless there is a good reason to protect the individual's personal data which overrides those legitimate interests for example collection of pupil assessment information.

For special category data such as; race, ethnic origin, religion, biometrics (where used for ID purposes), health, the same lawful basis identified above apply to this category of data. In addition, the following lawful basis from article 9 applies;

Processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects.

Collecting pupil information

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. To comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

Storing pupil data

Please refer to the school's retention policy for details regarding length of time pupil data is stored for.

Who we share pupil information with

We routinely share pupil information with:

- schools that the pupil's attend after leaving us
- our local authority, including Brent health team
- the Department for Education (DfE)
- pupil support services

- a number of data processors such as Arbor and Go4Schools.
- All sharing is subject to strict security and data minimisation principles.

Why we share pupil information

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

We share pupils' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

We are required to share information about our pupils with the (DfE) under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

Data collection requirements:

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to

<https://www.gov.uk/education/datacollection-and-censuses-for-schools>.

Data retention

Data is retained in line with the school retention schedule and statutory guidance

Youth support services

Pupils aged 13+

Once our pupils reach the age of 13, we also pass pupil information to our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13–19-year-olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

x youth support services x
careers advisers

A parent or guardian can request that **only** their child's name, address and date of birth is passed to their local authority or provider of youth support services by informing us. This right is transferred to the child / pupil once he/she reaches the age 16.

Pupils aged 16+

We will also share certain information about pupils aged 16+ with our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13–19-year-olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- post-16 education and training providers
- youth support services
- careers advisers

For more information about services for young people, please visit our local authority website.

The National Pupil Database (NPD)

The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities, and awarding bodies.

We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

The department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice, or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required

- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided pupil information, (and for which project), please visit the following website:

<https://www.gov.uk/government/publications/national-pupil-database-requests-received>

To contact DfE: <https://www.gov.uk/contact-dfe>

Requesting access to your personal data

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact Mr Adam Skordi at Claremont High School, or Mr Luke Webber at Sudbury Primary School

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased, or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations
- Right of access, rectification, erasure, restriction, objection, and data portability where applicable.
- Right to complain to the ICO.

Automated decision-making

- No significant decisions are made solely by automated means

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Contact

If you would like to discuss anything in this privacy notice, please contact:

Claremont High School Academy's Data Protection Lead:

Mr Adam Skordi

datateam@claremont-high.org.uk

Sudbury Primary School's Data Protection Lead:

Mr Luke Webber

dpl@sudburyprimary.co.uk