



# PRIVACY NOTICE – PUPILS / PARENTS

<b>Approval Date</b>	Pending ratification by Risk and Audit Committee (November 2025)
<b>Policy Owner</b>	Director of Operations
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<b>Review Date</b>	November 2027

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## **Privacy Notice (How We Use Pupil Information)**

This Privacy Notice explains how and why we store personal information about pupils and parents/carers. It provides a guide to parents/carers about our legal obligations and their own rights. Like any organisation which handles personal data, Reach South Academy Trust is defined as a 'Data Controller' and, as such, we are registered with the ICO (Information Commissioner's Office) and we comply with the Data Protection Act and UK General Data Protection Regulation. Reach South Academy Trust is joint controller with its schools who are also defined as Data Controllers. Reach South Academy Trust's schools are registered under the same ICO registration – Registration number ZA216361 – as the Trust and this includes the following:

- Drake Primary Academy
- Goosewell Primary Academy
- High Street Primary Academy
- Hill View Primary Academy
- Malmesbury Park Primary Academy
- Marlborough Primary Academy
- Millbay Academy
- Morice Town Primary Academy
- Peak Academy
- Pilgrim Primary Academy
- SAIL (Salisbury Academy for Inspirational Learning)
- Stoke Damerel Primary Academy
- Stuart Road Primary Academy
- The Springfields Academy
- Thomas Hall School
- UTC Plymouth

## The Categories of Pupil Information That We Process Include:

For all pupils	Personal Information	Name, Date of Birth, Gender, Year Group, Class, Address, Contacts Dietary needs, dietary preferences Medical practice address and telephone number Medical conditions
	Characteristics	Ethnicity, language, nationality, country of birth
	Attendance Information	Sessions attended, number of absences, reasons for absence
	Academic attainment and progress records	Teacher Assessment grades Statutory assessment results Standardised score results Learning journey evidence (photographs and annotations) Other photographic evidence of learning Reports to parents (mid-year and end of year)
	Other	Pupil Surveys Incidental evidence of pupils' successes (certificates, photographs, named trophies, celebration events)
For some pupils (only if applicable)	Other	Free School Meals eligibility Court Orders Other pupil premium eligibility (such as if the child is looked after) Safeguarding records (incidents, external agency reports Special Educational needs records (professional assessments, external professionals' reports, referrals for external support) Pastoral records (referrals for support both internal and external, notes of discussions with pupils, pupils' jottings of thoughts and feelings) Exclusion information Behaviour incident records
All Parents/Carers*	Personal Information	Names, addresses, telephone numbers, email addresses, relationship to the child (of parents/carers and other given contacts) Free school meals eligibility evidence
	Other	Parents' surveys Letters sent to school Emails sent to school Financial payments, including debt (both manual and electronic)

\*this refers to those with legal responsibility for the child

This list is not exhaustive, to access the current list of categories of information we process please request a copy of our asset register from the Trust.

### Why We Collect and Use Pupil Information

The personal data collected is essential, for the Trust and/or schools to fulfil their official functions and meet legal requirements.

We collect and use pupil information, for the following purposes:

- To support pupil learning
- To keep informed to keep children safe
- To monitor and report on pupil progress
- Safeguarding pupils' welfare and providing appropriate pastoral (and where necessary medical) care
- Informing decisions such as the funding of schools
- Assessing performance and to set targets for schools

- Giving and receive information and references about past, current and prospective pupils, and to provide references to potential employers of past pupils
- Managing internal policy and procedure
- Enabling pupils to take part in assessments, to publish the results of examinations and to record pupil achievements
- To carry out statistical analysis for diversity purposes
- Legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care
- Enabling relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate
- Monitoring use of the school's IT and communications systems in accordance with the school's IT security policy
- Making use of photographic images of pupils in school publications, on the school or Trust website and on social media channels
- Security purposes, including CCTV
- To comply with the law regarding data sharing
- To meet the statutory duties placed upon us for DfE data collections

We use the parent's/carer's data:

- To assess the quality of our services
- To comply with the law regarding data sharing
- To ensure financial stability
- To liaise in relation to complaints or performance of individuals where appropriate

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing pupil information are:

The lawful bases for processing personal data are set out in Article 6 of the UK General Data Protection Regulation. The Trust processed such data because we have:

(6a) Consent: parents/carers have given clear consent for us to process their (and their child's) personal data for the purposes indicated above.

(6c) A Legal obligation: the processing is necessary for us to comply with the law (e.g. we are required by law to submit certain teacher assessment information and to safeguard pupils' welfare by sharing information with other agencies).

(6d) A duty to safeguard pupils: the processing is necessary in order to protect the vital interests of the data subject (children); (e.g. if we are required to share medical history information with emergency services in the event of an accident or to other agencies when a child may be in danger).

(6e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law (e.g. processing attendance information or academic attainment and progress records).

Special Categories of data are set out in Article 9 of the UK General Data Protection Regulation. The Trust processes such data because we have:

(9.2a) explicit consent. In circumstances where we seek consent, we make sure that the consent is unambiguous and for one or more specified purposes, is given by an affirmative action and is recorded as the condition for processing. Examples of our processing include use of pupil photographs for external purposes, pupil dietary requirements, and health information we receive from our pupils who require a reasonable adjustment to access our services.

(9.2b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.

(9.2c) where processing is necessary to protect the vital interests of the data subject or of another natural person. An example of our processing would be using health information about a pupil in a medical emergency.

(9.2f) for the establishment, exercise or defence of legal claims. Examples of our processing include processing relating to any employment tribunal or other litigation.

(9.2g) reasons of substantial public interest. As a Trust, we are a publicly funded body and provide a safeguarding role to young and vulnerable people. Our processing of personal data in this context is for the purposes of substantial public interest and is necessary for the carrying out of our role. Examples of our processing include the information we seek or receive as part of investigating an allegation.

(9.2j) for archiving purposes in the public interest. The relevant purpose we rely on is Schedule 1 Part 1 paragraph 4 – archiving. An example of our processing is the transfers we make to the County Archives as set out in our Records Management Policy.

We process criminal offence data under Article 10 of the UK GDPR.

Our Data Protection Policy highlights the conditions for processing in Schedule 1 of the Data Protection Act 2018 that we process Special Category and Criminal Offence data under.

## **How We Collect Pupil Information**

We collect pupil information via registration forms at the start of the school year or Common Transfer File (CTF) or secure file transfer from the previous setting. We also receive data from other educational support and Safeguarding services.

Pupil data is essential for the Trusts' operational use. Whilst most of the pupil information you provide to us is mandatory, some of it requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this.

## **How We Store Pupil Data**

We hold pupil data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please see the Records Management Policy.

All confidential information is kept secure either on encrypted, password protected devices or paper copies kept on the Trust premises. Once the deadline for retaining information has passed, data kept electronically is deleted and paper copies are destroyed in conjunction with the retention schedule as stated in the Records Management Policy.

## **Who We Share Pupil Information With**

We routinely share pupil information with:

- Schools that the pupil attends, including after leaving us
- Local authorities
- The Department for Education (DfE)
- Standards and Testing Agency (STA)

- Children’s Social Care (when safeguarding pupils’ welfare)
- External professionals who visit school (such as Educational Psychologists)
- Law enforcement officials, such as the Police
- The NHS
- Suppliers and service providers with whom we have a contract
- Voluntary organisations linked to the Trust

## **Why We Regularly Share Pupil Information**

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

Our schools and services regularly share information for the purposes of education of the child, this includes but is not limited to the provision of lessons, educational experiences, associated activities, pastoral support, Safeguarding and health. We will also share information for reasons of good communication, community involvement and marketing of our activities and schools.

### **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:

- youth support services
- careers advisers

The information shared is limited to the child’s name, address and date of birth. However, where a parent/carer provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the child / pupil once they reach the age 16.

#### **Pupils Aged 16+**

Our schools and service will also share certain information about pupils aged 16+ with the 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

Data is securely transferred to the youth support service via secure transfer and is stored in line with their own retention schedules and policies

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

### **Department for Education**

The Department for Education (DfE) collects personal data from our educational settings and local authorities via various statutory data collections. We are required to share information about our pupils with the Department for Education (DfE) either directly or via our local authority for the purpose of those data collections, under:

regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

All data is transferred securely and held by DfE under a combination of software and hardware controls, which meet the current [government security policy framework](#).

For more information, please see 'How Government uses your data' section.

### **Local Authorities**

Schools may be required to share information about our pupils with the local authority to ensure that they can conduct their statutory duties under

- the [Schools Admission Code](#), including conducting Fair Access Panels.
- KCSIE statutory guidelines

### **Standards and Testing Agency**

We are required to share data with the [Standards and Testing Agency](#) under the Key Stage 1 and Key Stage 2 assessment and reporting arrangements (ARA). This is a statutory requirement and sharing is done under legal obligation and public task lawful bases.

For general enquiries about the assessment and reporting arrangements, contact the national curriculum assessments helpline on 0300 303 3013 or email [assessments@education.gov.uk](mailto:assessments@education.gov.uk).

### **Requesting Access to Your Personal Data**

The UK-GDPR gives you certain rights about how your information is collected and used. To make a request for your personal information, contact [DPO@schoolpro.uk](mailto:DPO@schoolpro.uk).

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of personal information we have about you – this is called 'right of access', this is also known as a subject access request, data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to complain to the Information Commissioner if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at raise a concern with ICO

Alternatively, you can contact our Data Protection Officer which is SchoolPro TLC Ltd via [DPO@schoolpro.uk](mailto:DPO@schoolpro.uk).

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

### **Withdrawal of Consent and the Right to Lodge a Complaint**

We process the majority of data as part of our public task, where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting [DPO@schoolpro.uk](mailto:DPO@schoolpro.uk) who are our registered Data Protection Officer.

### **Contact**

If you would like to discuss anything in this privacy notice, please contact: [DPO@schoolpro.uk](mailto:DPO@schoolpro.uk)

## How Government Uses Your Data

The pupil data that we lawfully share with the DfE through data collections:

- underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- informs 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).
- supports 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

## 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/data-collection-and-censuses-for-schools>

## The National Pupil Database (NPD)

Much of the data about pupils in England goes on to be held in 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.

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

## *Sharing by the Department for Education (DfE)*

The Department for Education (DfE) may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

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

The Department for Education (DfE) will only share your personal data where it is lawful, secure and ethical to do so and has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether the Department for Education (DfE) releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of public benefit, proportionality, legal underpinning and strict information security standards.

For more information about the Department for Education's (DfE) 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 for Education (DfE) has provided information, (and for which project) please visit the following website: <https://www.gov.uk/government/publications/dfe-external-data-shares>

## ***How to Find Out What Personal Information the Department for Education (DfE) Hold About You***

Under the terms of UK GDPR, you're entitled to ask the Department for Education (DfE):

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department for Education (DfE), you should make a 'subject access request'. Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter> or <https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

## POLICY HISTORY

Date	Summary of change	Contact	Policy Implementation Date	Review Date
25/09/2024	<p>Updates made to three sections as per the DfE template updates. Updates as follows:</p> <ul style="list-style-type: none"> <li>- Requesting access to your personal data - replaced entire section with new text</li> <li>- Sharing by the Department for Education (DfE) - replaced entire section with new text</li> <li>- How to find out what personal information the Department for Education (DfE) hold about you - replaced entire section with new text</li> </ul> <p>Peak Academy, SAIL (Salisbury Academy for Inspirational Learning) and Thomas Hall School added to list of joint controllers and academies and Springfield South removed</p>	SchoolPro TLC	October 2024	October 2025
November 2025	<p>Removed reference to Parkfield school.</p> <p>Added contents page.</p>	Operations	November 2025	November 2027