



# Privacy Notice (How we use pupil information)

## The categories of pupil information that we process include:

- personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- characteristics (such as ethnicity, language, and free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- special educational needs (including the needs and ranking)
- medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (such as key stage 1 and phonics results, post 16 courses enrolled for and any relevant results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- information needed to manage education trips e.g. consent, payment and emergency contact information
- information needed to manage systems such as catering, free school meals, extended childcare offers, music tuition, school photos

## Why we collect and use pupil information

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

- a) to support pupil learning
- b) to monitor and report on pupil attainment progress
- c) to provide appropriate pastoral care
- d) to assess the quality of our services
- e) to keep children safe (food allergies, or emergency contact details)
- f) to meet the statutory duties placed upon us for the Department for Education (DfE) data collections
- g) to record consent and manage additional activities such as after school clubs and education visits

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

- **Consent (Article 6(1)(a))** – we have permission from you to process the personal data. You do have the right to withdraw your consent at any time.
- **Contract (Article 6(1)(b))** – we collect and process personal data necessary for the performance of a contract.
- **Legal Obligation (Article 6(1)(c))** – we collect and process personal data so we can comply with the law.
- **Vital Interests (Article 6(1)(d))** – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk.
- **Public Task (Article 6(1)(e))** – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours.
- **Legitimate Interest (Article 6(1)(f))** – for the purposes of our legitimate interest.

We may process personal information based on legitimate interests, provided that such interests are not overridden by your rights and freedoms. In the context of the school, our legitimate interests include:

- Ensuring the effective operation and administration of the school, including the coordination of teaching, learning, and extracurricular activities.
- Protecting the safety and welfare of pupils, staff, and visitors, including monitoring school premises.
- Maintaining the security and efficient functioning of school systems, networks, and data.
- Conducting internal audits, investigations, and due diligence as needed.

Where we are required to collect special category data, we will use the following lawful bases of the UK GDPR which permits us to process special category data:

- **Explicit Consent (Article 9(2)(a))** – we may request explicit consent from individuals (or parents/guardians in the case of minors) to process special category data for specific purposes, such as, using biometric information to identify individuals to school IT systems
- **Employment, Social Security, and Social Protection (Article 9(2)(b))** – we may process special category data necessary for fulfilling obligations in the fields of employment law, social security, or social protection, such as medical conditions, allergies, or disabilities, to comply with laws that require them to ensure a safe environment.
- **Vital Interests (Article 9(2)(c))** – in situations where processing is essential to protect someone's life, such as during a medical emergency, schools may process special category data without prior consent.
- **Made public by the data subject (Article 9 (2)(e))** – to process special category data if that data has been manifestly made public by the data subject.
- **Legal claims (Article 9(2)(f))** – where the processing is for the purposes of establishing, exercising, or defending legal claims or by courts when they are acting in their judicial capacity.
- **Substantial Public Interest (Article 9(2)(g))** – we often process special category data in the public interest, for instance, to comply with equality legislation, ensure diversity and inclusion, or meet safeguarding obligations.
- **Provision of Health or Social Care (Article 9(2)(h))** – we may collect health-related data to provide appropriate health care services or health management for pupils, such as managing disability accommodations or providing necessary medical care.
- **Archiving, Research, or Statistical Purposes (Article 9(2)(j))** – we may process special category data for academic research, statistical purposes, or archiving in the public interest, provided that appropriate safeguards are in place.

Some of the reasons listed above for collecting and using personal data overlap, and there may be several grounds which justify our use of this data.

## Collecting pupil information

Collecting pupil data is essential for our schools' operational use. Whilst the majority of pupil information you provide to us is compulsory, we do request some 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.

Most of the personal information we process is provided to us by you for one of the following reasons:

- You have enrolled a pupil
- You wish to attend, or have attended, an event organised by us
- You have made an enquiry to us
- You have made a complaint to us
- You have made an information request to us.

We also receive personal information indirectly, for example:

- We have contacted another organisation about a pupil, and it gives us personal information in its response.

- Personal information is contained in reports from other agencies such as Local Authority or the NHS
- A complainant refers to you in their complaint correspondence
- Other parents include information about you in their reporting to us
- From other public authorities, regulators, or law enforcement bodies.

We collect pupil information in a number of ways such as via school enrolment forms, common transfer/secure transfer files from other schools/services.

### **Storing pupil data**

In accordance with the UK GDPR, the school does not store personal data indefinitely. We will only use and store personal information for as long as it is required for the purposes it was collected for.

All personal information is kept secure either on encrypted, password protected devices and systems, or paper copies kept on the school site. Once the deadline for retaining information has passed, data stored electronically is deleted and paper copies destroyed.

### **Who we share pupil information with**

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- Trust staff
- The pupil's family and representatives
- Parents or carers of Trust school students
- Educators and examining bodies
- Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Financial organisations
- Central and local government
- Our auditors
- Survey and research organisations
- Health authorities
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Media publications
- Police forces, courts, tribunals

### **Why we regularly 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.

When we use suppliers and service providers to process information, we ask them to demonstrate compliance with our security requirements, adhere to any instructions we give them and comply with relevant data protection legislation. We have contractual agreements with these organisations which clearly define their obligations about what information they hold.

## Department for Education (DfE)

The Department for Education (DfE) collects personal data from 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:

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

For privacy information on the data the Department for Education collects and uses, please see: Privacy information: early years foundation stage to key stage 3 – GOV.UK ([www.gov.uk](http://www.gov.uk))

## 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 the school office for more details

You also have the right to:

- to ask us for access to information about you that we hold
- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance, you may contact the Trust's Data Protection Officer:

Mrs D Barker  
Data Protection Officer  
High View Primary Learning Centre  
Newsome Avenue  
Wombwell  
Barnsley  
S73 8QS

01226 273220  
[d.barker@ecmtrust.co.uk](mailto:d.barker@ecmtrust.co.uk)

or go directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

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**

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 the school office.

## **Last updated**

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated in November 2025.

## **Contact**

If you would like to discuss anything in this privacy notice, please contact the school office.

## **How Government uses your data**

The pupil data that we lawfully share with the the Department for Education (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 (DfE) (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 (DfE) 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 for Education (DfE).

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 law allows the Department for Education (DfE) to share pupils' personal data with certain third parties, including:

- schools and local authorities
- researchers
- organisations connected with promoting the education or wellbeing of children in England

- other government departments and agencies
- organisations fighting or identifying crime

For more information about the Department for Education's (DfE) NPD data sharing process, please visit:

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

Organisations fighting or identifying crime may use their legal powers to contact the Department for Education (DfE) to request access to individual level information relevant to detecting that crime.

For information about which organisations the Department for Education (DfE) has provided pupil information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the Police 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) holds about you**

Under the terms of the [Data Protection Act 2018](#), you are 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>

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>