



**Grove**  
*Learning Trust*

---

**Creating Remarkable Futures**

# Privacy Notice (Parents & Pupils)

**Owner:** Grove Learning Trust

**Author:** Sarah Rutherford – Governance & Compliance Lead – SchoolPro model used

**Approved by:** Chief Executive Officer (Interim)

**Date approved:** Autumn 2025

**Next review:** Autumn 2026

# Contents

Version Control (GLT) .....	3
Document Version Control Log.....	3
Vision & Values .....	5
About this policy .....	5
Categories of Pupil Information That We Process .....	6
Why We Collect and Use Pupil Information .....	6
How We Collect Pupil Information .....	8
How We Store Pupil Data.....	8
Who We Share Pupil Information With .....	8
Why We Regularly Share Pupil Information .....	9
Department for Education (DfE).....	9
Local Authorities .....	9
Standards and Testing Agency .....	9
Requesting Access to Your Personal Data .....	9
Withdrawal of Consent and the Right to Lodge a Complaint.....	10
Review .....	10
Contact .....	10
How Government Uses Your Data.....	11
Data Collection Requirements.....	11
The National Pupil Database (NPD) .....	11
Sharing by the Department for Education (DfE) .....	11
How to Find Out What Personal Information the Department for Education (DfE) Hold About You	12

## Version Control (GLT)

Version	Date	Status	Author (AU) / Approver (AP)
Draft 01	November 24	First draft (SchoolPro model)	SR (AU)
Final – A	Autumn 2024	Trustees (RAR) to approve	RAR (AP)
Draft 02	Autumn 2025	<p>Moved to central model template.</p> <p>Contact email address changed to <a href="mailto:DPO@schoolpro.uk">DPO@schoolpro.uk</a></p> <p>New legislation – link added to Data (Use and Access) Act 2025</p> <p>Appendix A added to show updates following new legislation</p> <p>Sharing by Department for Education (DfE) updated.</p> <p>The National Pupil Database (NPD) - Text updated to reflect how education and children's services sectors are working to help ensure all children are kept safe from harm and receive the best possible education.</p> <p>Revised complaint handling section to reflect Section 164A DPA 2018 (as amended by DUAA 2025). Individuals must now submit complaints directly to the organisation.</p> <p>Links to government publications have been updated in the section "How to Find Out What Personal Information the Department of Education (Dfe) Hold About You"</p>	SR (AU)

## Document Version Control Log

Version	Date	Description of changes and person/organisation responsible
2.0	27/04/2020	<p>Text updated in 'Why We Collect and Use Pupil Information' to reflect additional conditions in Article 6 for processing data – (6c) a legal obligation and (6e) public task.</p> <p>Text updated in 'Why We Collect and Use Pupil Information' to reflect additional conditions in Article 9 for processing special category data – (9.2a) explicit consent, (9.2c) protection of vital interests, (9.2f) legal claims, (9.2g) substantial public interest, &amp; (9.2j) archiving purposes.</p> <p>Text updated in 'Why We Collect and Use Pupil Information' to reflect Article 10 for processing criminal offence data.</p>

2.1	25/02/2021	<p>Text updated to reflect end of Brexit transition and updates references from the General Data Protection Regulation (GDPR) to the UK General Data Protection Regulation (UK GDPR). (SchoolPro TLC)</p> <p>Why We Collect and Use Pupil Information – additional purposes added to assist schools in identifying all purposes that the organization may collect data (SchoolPro TLC)</p> <p>Who We Share Pupil Information With – additional organisations added to assist schools in identifying all organizations that data is shared with. Text added with regards to security of sharing and confidentiality where relevant (SchoolPro TLC)</p>
2.2	04/04/2022	<p>Text updated in 'Who We Share Pupil Information With' to include Standards and Testing Agency (STA). (SchoolPro TLC)</p> <p>Text also updated in 'Why We Regularly Share Pupil Information' to reflect why data is shared with STA as part of ARA. (SchoolPro TLC)</p>
2.3	17/10/2022	<p>Text updated in 'Requesting Access to Your Personal Data' to reflect new DfE wording regarding data subject rights. Bullet point list has been updated as well as introductory text to the list. (SchoolPro TLC)</p>
2.4	11/08/2023	<p>Text updated in 'How the Government Uses Your Data' to include some text minor changes.</p> <p>The changes are mostly to change references to the DfE to 'Department for Education (DfE)' in all cases and remove statistics on pupil data shares. (SchoolPro TLC)</p>
2.5	01/11/2023	<p>Updated a link to the National Pupil Database (NPD) privacy notice based on DfE update (SchoolPro TLC)</p>
2.6	30/08/2024	<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 (SchoolPro TLC)</li> </ul>
2.7	19/05/2025	<p>Sharing by Department for Education (DfE) updated.</p>
2.8	16/10/25	<p>The National Pupil Database (NPD) - Text updated to reflect how education and children's services sectors are working to help ensure all children are kept safe from harm and receive the best possible education.</p>
2.9	31/10/2025	<p>Revised complaint handling section to reflect Section 164A DPA 2018 (as amended by DUAA 2025). Individuals must now submit complaints directly to the organisation.</p> <p>Links to government publications have been updated in the section "How to Find Out What Personal Information the Department of Education (Dfe) Hold About You"</p>

## **Vision & Values**

As one organisation, our vision for Grove Learning Trust is unapologetically bold. We are all about **creating remarkable futures**. For our children, our people, our places of work, we want the very best. We know that strong connections will enable us to achieve our vision, in a world where purposeful collaboration, based on mutual respect and trust, helps us to achieve more together.

**Trust >> Connect >> Collaborate**

Our policies underpin our vision and set out clearly our expectations of each other.

## **About this policy**

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, our school 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

## Categories of Pupil Information That We Process

This list is not exhaustive, to access the current list of categories of information we process please

For <u>all</u> 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)
For <u>some</u> pupils (only if applicable)	Other	Pupil Surveys Incidental evidence of pupils' successes (certificates, photographs, named trophies, celebration events)
	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

see [www.grovelearningtrust.co.uk](http://www.grovelearningtrust.co.uk)

## Why We Collect and Use Pupil Information

The personal data collected is essential, for the school 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 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 parents' data:

- To assess the quality of our services
- To comply with the law regarding data sharing
- To ensure financial stability

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 school processed such data because we have:

(6a) Consent: parents 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 school 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 school, 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.

Pupil data is essential for the schools' operational use. Whilst the majority of 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 visit [www.grovelearningtrust.co.uk](http://www.grovelearningtrust.co.uk)

All confidential information is kept secure either on encrypted, password protected devices or paper copies kept on the school site. Once the deadline for retaining information has passed, data kept electronically is deleted and paper copies are destroyed in conjunction with the retention schedule.

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

We routinely share pupil information with:

- Schools that the pupil attends after leaving us
- Our local authority
- 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 school

Information will be provided to those agencies securely or anonymised where possible.

The recipient of the information will be bound by confidentiality obligations - we require them to respect the security of your data and to treat it in accordance with relevant legislation.

## **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.

### **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:

Section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

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

### **Local Authorities**

We 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.

### **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 [admin@grovelearningtrust.co.uk](mailto:admin@grovelearningtrust.co.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 have 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**

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 [admin@grovelearningtrust.co.uk](mailto:admin@grovelearningtrust.co.uk)

Under Section 164A of the Data Protection Act 2018, you have a statutory right to complain if you believe your personal data has been handled inappropriately.

If you wish to raise a concern about how we process your personal data, please contact us directly at [DPO@schoolpro.uk](mailto:DPO@schoolpro.uk). We will acknowledge your complaint within 30 days of receipt and take appropriate steps to investigate and respond without undue delay.

If you are not satisfied with our response, you may escalate your complaint to the Information Commission at: **Information Commissioner's Office**

## **Review**

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 November 2024.

## **Relevant Legislation**

[Data \(Use and Access\) Act 2025](#)

## **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 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)

The NPD is owned and managed by the Department for Education (DfE) and contains information about pupils in schools in England. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

The data in the NPD is provided as part of the operation of the education system and is used for research and statistical purposes to improve, and promote, the education and well-being of children in England.

The evidence and data provide DfE, education providers, Parliament and the wider public with a clear picture of how the education and children's services sectors are working in order to better target, and evaluate, policy interventions to help ensure all children are kept safe from harm and receive the best possible education. To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-npd-privacy-notice/national-pupil-database-npd-privacy-notice>

## 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>

## **Appendix A – Updates following new legislation – Data (Use and Access) Act 2025**

- New rights under Automated Decision-Making (ADM): Individuals have the right to be informed about ADM, challenge decisions, and request human intervention.
- Recognised Legitimate Interests: A new lawful basis for processing personal data in defined contexts, especially for SMEs and public bodies.
- Subject Access Requests (SARs): Introduction of 'reasonable and proportionate' search scope and a 'stop-the-clock' provision for complex requests.
- Enhanced Protections for Children's Data: Stronger requirements for consent and privacy notices in digital services involving children.
- Internal Complaints Handling Requirement: From June 2026, organisations must maintain a formal internal data protection complaints process with a 30-day response and 3-month resolution timeline.