THE WHITE HILLS PARK TRUST

Privacy notice – Pupil Data

Introduction

We collect a significant amount of information about our pupils. We also collect data about parents, carers and emergency contacts that are linked to a pupil. This notice explains why we collect the information, how we use it, the type of information we collect and our lawful reasons to do so.

Why do we collect data?

We collect and use pupil data to:

- fulfil our statutory obligations to safeguard and protect children and vulnerable people
- enable targeted, personalised learning for pupils
- manage behaviour and effective discipline
- monitor our effectiveness
- comply with our legal obligations to share data
- support pupils to fulfil their potential
- keep pupils, parents and carers informed about events and news news

Our legal obligations

We must make sure that information we collect and use about pupils is in line with the UK GDPR and Data Protection Act 2018. This means that we must have a lawful reason to collect the data, and that if we share that with another organisation or individual, we must have a legal basis to do so.

The lawful basis to collect information comes from a variety of sources, such as the Education Act 1996, Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013, Article 6 and Article 9 of the UK GDPR.

The Department for Education (DfE) and Local Authorities (LA) require us to collect certain information and report back to them. This is called a 'public task' and is recognised in law as it is necessary to provide the information.

We also have obligations to collect data about children who are at risk of suffering harm, and to share that with other agencies who have a responsibility to safeguard children, such as the police and social care.

We also share information about pupils who may need or have an Education Health and Care Plan (or Statement of Special Educational Needs). Medical teams have access to some information about pupils, either by agreement or because the law says we must share that information, for example school nurses may visit the school.

Sharing information

Other services, organisations and people we may share information with include:

- schools or academies that the students attend after leaving us
- relevant local authority/(ies)
- youth support services (students aged 13+)
- the Department for Education (DfE)
- the NHS as required
- school nursing service
- parent/carer
- suppliers and service providers
- health professionals
- health & social welfare organisations

- professional bodies
- charities and voluntary organisations
- auditors
- survey & research organisations
- social care organisations
- police forces and court services
- suppliers of software and apps that are used in school

We must keep up to date information about parents and carers for emergency contacts.

How we use the data

We also use various third-party tools to make sure that pupils best interests are advanced. We also record details about progress, attainment and pupil development to support future planning and learning.

We use data to manage and monitor pastoral needs and attendance/absences so that suitable strategies can be planned if required.

We use systems to take electronic payments for school meals. This includes financial software to manage school budgets, which may include some pupil data. We use software to track progress and attainment.

Data can be used to monitor school effectiveness, the impact of intervention and learning styles across groups of pupils as well as individual children.

We may use consultants, experts and other advisors to assist the school in fulfilling its obligations and to help run our schools properly. We might need to share pupil information with them if this is relevant to their work.

We also use contact information to keep pupils, parents, carers up to date about events.

Use of Artificial Intelligence (AI)

The trust/academy/school may use AI technologies to support educational, administrative, and safeguarding functions. This includes, but is not limited to, tools that assist with:

- enhancing learning experiences and personalising education
- automating routine administrative tasks
- supporting data analysis for school improvement
- monitoring safeguarding concerns and wellbeing indicators

AI systems used by the trust/academy/school are subject to appropriate oversight and controls to ensure they comply with data protection laws and ethical standards.

AI tools do not make final decisions about individuals without human involvement. Any outputs from AI systems are reviewed and interpreted by staff before any action is taken.

A separate AI Privacy Notice is available and provides further detail about the types of AI used, the data involved, our legal basis for processing and how risks are managed. This document can be accessed via our website.

What type of data is collected?

The DfE and government requires us to collect a lot of data by law, so that they can monitor and support schools and academies more widely, as well as checking on individual schools and academies effectiveness.

The categories of pupil information that we hold and share include the following:

- personal information – e.g. names, dates of births, pupil numbers and addresses
- characteristics – e.g. ethnicity, vulnerability categories, language, nationality, country of birth and free school meal eligibility
- behaviour data
- attendance information – e.g. number of absences and absence reasons
- assessment information – e.g. national curriculum assessment results
- relevant medical information and social care
- information relating to SEND and health needs
- behavioural information – e.g. number of temporary exclusions
- CCTV, photos and video recordings

The National Pupil Database (NPD)

The NPD is owned and managed by the DfE and contains information about pupils in schools/academies 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 pupil information we share with the department, for the purpose of data collections, go to https://www.gov.uk/education/data-collection-and-censuses-for-schools.

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

Immunisations and Vaccinations

The Department for Education has issued guidance, updated in March 2025 explaining that schools must share information with the School Age Immunisation Services, who are commissioned by NHS England to deliver school-based immunisation programmes. Information that is to be shared on request includes a list of eligible children and young people and their parent or carer's contact details to the SAIS team.

The immunisation process is a matter of consent between the pupil, parent and or carer and the SAIS provider. Whilst the school do not take any active role in the process, where a young person wishes to be vaccinated on the day, but the consent form has not been returned, the school will make every effort to contact the parent/carer to seek verbal consent.

The obligation to share data is within public task and does not rely upon consent. It is mandatory for the school to share this information.

National Child Measurement Programme (NCMP)

Local authorities are required to collect the height and weight of reception and year 6 children as set out within the following regulations:

> The Local Authorities (Public Health Functions and Entry to Premises by Local Healthwatch Representatives) Regulations 2013
>
> The Local Authority (Public Health, Health and Wellbeing Boards and Health Scrutiny) Regulations 2013

The statutory authorities provide the lawful basis for processing NCMP data under UK GDPR:

- compliance with a legal obligation
- performance of a task carried out in the public interest
- managing health or social care systems and services
- public interest in the area of public health
- processing for archiving, scientific or historical research or statistical purposes

Parental consent is therefore not the lawful basis for processing, so the school does not rely upon consent to share the relevant information to the NCMP providers.

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 data lead in your 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

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 https://ico.org.uk/concerns/.

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law and with appropriate safeguards in place.

Contact

If you would like to discuss anything in this privacy notice, please contact James Macdonald – james.macdonald@whptrust.org

More information about data protection and our policies

How we manage the data and our responsibilities to look after and share data is explained in our data protection policy, and connected policies, which are also available on our website.

If you feel that data about your child is not accurate, or no longer needed please contact the school office.

Our complaints policy explains what to do if there is a dispute.

Subject Access Requests are dealt with by the specific policy on the website.

Review

We will update this privacy notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.