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www.twhf.org.uk

PRIVACY NOTICE

AUDIENCE: Parents, Carers, Guardians and Pupils

Introduction

Under data protection law, individuals have the right to be informed about how their personal data is collected, used, and stored. The White Horse Federation and its schools uphold this right by providing clear and accessible privacy notices whenever personal data is processed. This notice outlines how we handle personal data relating to pupils, parents, carers, and guardians.

Who We Are

The White Horse Federation and its schools act as the 'data controller' under data protection legislation. This means we are responsible for determining how and why personal data is processed.

Contacting the Data Protection Officer (DPO)

If you have any questions, concerns, or require further information about how your personal data is used, please contact our Data Protection Officer:

Lyn Rouse

Email: DPO@twhf.org.uk

The Personal Data We Hold

We process personal data to carry out our public duties as an education provider and to meet legal obligations under UK data protection law.

We collect, use, store, and share personal data relating to:

Parents, Carers and Guardians

Personal identifiers: Name, address, email address, telephone number

Health information: Where relevant to the pupil's care or school activities

Dependants' information: Details necessary to support the pupil's education and welfare

Pupils

Personal identifiers: Name, date of birth, address, responsible adult details

Special category data:

Ethnicity and religious beliefs (for statutory reporting and inclusion)

Health and medical information (to support wellbeing and safeguarding)

Safeguarding information: Records relating to pupil safety and welfare

Special Educational Needs (SEN): Support plans and assessments

Medical information: Conditions, medications, and care plans

Attendance records: Absences, lateness, and reasons

Attainment data: Academic progress and assessment results

Behavioural data: Incidents, achievements, and exclusions

Images and recordings: Photographs, videos, and CCTV footage

Why We Use This Data

We collect and process personal data to fulfil our public duties as an education provider and to meet legal and statutory obligations. The data we hold helps us to:

Support pupil learning and development

Monitor academic progress, identify learning needs, and provide tailored educational support.

Communicate effectively with families

Contact parents, carers, and guardians regarding pupil welfare, school updates, and emergencies.

Safeguard pupils and promote wellbeing

Ensure the safety and welfare of pupils through appropriate pastoral care and safeguarding measures.

Provide medical and pastoral support

Manage health conditions, administer care plans, and support emotional wellbeing.

Track and improve school performance

Analyse pupil outcomes, attendance, and behaviour to evaluate and enhance school effectiveness.

Manage admissions and transitions

Process applications, allocate places, and support pupils moving between schools or educational phases.

Administer school trips and activities

Organise extracurricular events, ensuring safety, consent, and appropriate planning.

Support families with additional needs

Provide targeted assistance to families, including access to support services and funding.

Meet statutory reporting requirements

Fulfil obligations to government bodies such as the Department for Education (DfE), Ofsted, and local authorities.

Manage school finances and funding

Determine eligibility for financial support, such as free school meals and pupil premium.

Comply with health and safety obligations

Maintain records necessary for safeguarding, incident reporting, and emergency response.

Maintain school security

Use systems such as visitor logs, access controls, and CCTV to ensure a safe environment.

Detect and prevent crime

Support law enforcement and protect the school community through appropriate data use.

All personal data is processed in accordance with UK data protection law and only where we have a lawful basis to do so.

Sharing Your Personal Information

We only share personal data where it is lawful and necessary to support pupils, fulfil our public duties, or comply with legal obligations. Your personal information may be shared with the following types of organisations:

Family and Community

- **Parents, carers, and legal representatives** – to support pupil welfare and engagement
- **Parent-Teacher Collaboration** – for school community activities and communications

Statutory and Regulatory Bodies

- **Local authorities** – to meet legal duties, including safeguarding concerns, exclusions, and education support purposes
- **Department for Education (DfE)** – for statutory data collections and national education monitoring
- **Ofsted and other regulators** – for inspection and compliance purposes
- **Central and local government** – for policy, funding, and planning

Education and Assessment Partners

- **Educators and examining bodies** – to support learning, assessments, and qualifications
- **Other schools or educational settings** – during transitions or collaborative support

Health, Safety and Welfare Organisations

- **Health authorities and school nurses** – to support medical needs and public health initiatives
- **Social care and welfare services** – where additional support or safeguarding is required
- **Security organisations** – including for site safety and incident response
- **Police forces, courts, and tribunals** – where required by law or for safeguarding purposes

Support and Advisory Services

- **Professional advisers and consultants** – for educational, legal, or operational support
- **Charities and voluntary organisations** – where they provide direct support to pupils or families
- **Survey and research organisations** – to help improve educational outcomes and services

Administrative and Technical Services

- **Suppliers and service providers (third parties)** – to deliver contracted services such as IT systems, catering, or transport
- **Financial organisations** – for processing payments, funding, or financial support
- **Auditors** – to ensure financial and operational accountability

We ensure that any organisation we share data with has appropriate safeguards in place to protect your information. Data is only shared where necessary, and in accordance with UK data protection law.

Transferring Data Internationally

We do not routinely transfer personal data outside the UK or European Economic Area (EEA). However, in specific circumstances — such as organising a residential trip abroad — we may need to share limited personal data with organisations or individuals based outside the EEA (e.g. accommodation providers, travel companies, or host schools).

In such cases, we will:

- Only share the minimum necessary data required for the purpose.
- Obtain your **explicit consent** before any international transfer takes place.
- Ensure that appropriate safeguards are in place to protect your data, in line with UK data protection law.

Use of Artificial Intelligence (AI)

We use artificial intelligence (AI) tools within the organisation to support certain administrative and operational processes, such as document management, data analysis, or communication support. However, we do **not** use AI to make decisions about individuals that have legal or similarly significant effects. If we decide to introduce AI for decision-making purposes in the future, we will inform you in advance and update this privacy notice accordingly.

Our Lawful Basis for Using Personal Data

We only collect and use personal data where it is necessary and lawful. Under Article 6 of the UK General Data Protection Regulation (UK GDPR), we rely on the following legal bases for processing:

- **Public Task**
The primary lawful basis for processing personal data is that it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority. This includes delivering education and safeguarding pupils.
- **Legal Obligation**
We are required by law to collect and retain certain information, such as attendance records, safeguarding concerns, and data for statutory reporting to government bodies.
- **Vital Interests**
In rare cases, we may need to process personal data to protect someone's life—for example, sharing medical information in an emergency.
- **Consent**
Where we are not relying on another lawful basis, we may ask for your consent to process specific types of data (e.g. using pupil photographs for promotional materials). You have the right to withdraw your consent at any time by contacting our Data Protection Officer, whose details are provided in this notice.
- **Legitimate Interests**
While public authorities generally cannot rely on this basis for tasks within their official functions, we may use it for activities outside our core public duties—such as managing alumni relations or fundraising—where it does not override your rights and freedoms.

Collecting This Information

Most of the personal data we hold about you is provided directly by you or your parent, carer, or guardian. We may also receive information from:

- Your previous school or nursery
- The local authority
- Other professionals involved in your education or care

In some cases, we use technology to help us manage and process data more efficiently. For example, we use **artificial intelligence (AI) tools to assist with inputting attendance data into our Management Information System (MIS)**. This helps ensure that attendance records are accurate and up to date. All AI-assisted processes are overseen by school staff to ensure data quality and integrity.

Sometimes, you can choose whether or not to provide certain information. If the data is **optional**, we will let you know and explain how it will be used. If the data is **required**, we will explain why we need it and what may happen if it is not provided.

We only collect information that is necessary to support your education, wellbeing, and safety, and we do so in line with data protection law.

Where Do We Store Your Information?

We store personal data in a variety of secure locations, depending on the type of information and how it is used. This includes:

- **Physical storage** – such as locked filing cabinets for paper-based records
- **Local digital storage** – on secure servers and devices within the school's IT network
- **Cloud-based systems** – hosted by approved third-party providers with appropriate data protection and security measures

All personal data is stored securely and protected by access controls, encryption, and other technical and organisational safeguards. Only authorised staff can access your information, and only when it is necessary for their role.

We ensure that all systems used to store data comply with UK data protection law, and we regularly review our security measures to keep your information safe.

If we use external providers (such as cloud services or MIS platforms), we ensure they meet strict data protection standards and have appropriate contracts in place.

Your rights

How to access personal information we hold about you

Under UK data protection law, you have the right to access the personal information we hold about you. This is known as a **Subject access request**.

Who can make a request?

- **Pupils** can make a request for their own personal data if they are considered mature enough to understand their rights (usually from age 12 and above).
- **Parents, carers, or guardians** can make a request on behalf of their child if the child is not considered mature enough to understand their rights, or where the child has given consent.
- **Parents, carers, or guardians** also have the right to request access to any personal data the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

Access to Educational Records

As an academy within a Multi-Academy Trust, **we are not subject** to the Education (Pupil Information) (England) Regulations 2005, which apply only to maintained schools. However, we are governed by the Education (Independent School Standards) Regulations 2014, which set out expectations for how we share information with parents and carers.

While there is no statutory right to access educational records under these regulations, we are committed to transparency and good practice. We may provide access to your child's educational record upon request, in line with our data protection responsibilities.

How to Make a Request

To make a request please email DPO@twhf.org.uk or visit the website and complete the form.

Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

Complaints

We take concerns about the handling of personal data seriously. If you believe that our collection or use of your personal information is unfair, misleading, inappropriate, or otherwise causes concern, we encourage you to raise this with us in the first instance. You can make a complaint by contacting our Data Protection Officer.

DPO@twhf.org.uk

If you are not satisfied with our response, or believe that your data protection rights have been infringed, you have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK's independent regulator for data protection:

Online: Report a concern

Phone: 0303 123 1113

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

We may change our privacy notice so please check this page from time to time, your continued use of our services indicates your acceptance of any changed terms that may have occurred during the interim.

Last updated 15th August 2025
Version 2