

PRIVACY NOTICE

AUDIENCE: Pupils & Students

Introduction

You have a legal right to be informed about how our schools use any personal information that we hold about you. To comply with this and to be transparent, we provide a 'privacy notice.'

This privacy notice explains what data we process, what rights you have with regards to your personal data and how you can exercise those rights.

We, the White Horse Federation, and school are the 'data controller' for the purposes of data protection law.

Who can I speak to about my data?

If you need to contact us regarding your personal data, or if you have any questions, concerns, or would like more information about anything mentioned in this privacy notice, please contact our data protection officer:

Lyn Rouse – dpo@twhf.org.uk

What personal data do you hold?

Schools collect information about pupils so we can educate, support, and safeguard children and meet our legal responsibilities. Some information is "special category," which means we need to be extra careful when we collect, store, and share it.

The types of information that we collect, process, store and share include:

- Your name, home addresses, and date of birth
- Who is your responsible adult, next of kin, and emergency contact
- Your attendance – how often you are sick or are late
- Your attainment – how well you're doing at school
- Your behaviour – details of positive or negative behaviour, including suspensions and exclusions
- Your looked-after status and adoption history
- Your image and where you can be seen on CCTV

What special category data do you hold?

There are also some special types of information that need extra care. The types of special category information that we collect,

- Your biometric information (sometimes when your school uses something like a fingerprint scanner)
- Your ethnicity
- Your religious beliefs

- Your health/medical information, your allergies, any conditions, or injuries, etc
- Your safeguarding information
- Any Special Educational Needs information, how we can support you, etc

What do you use my data for?

- To help you learn better.
- To see how you're doing in school.
- To make sure you're safe and looked after.
- To help make decisions about school funding
- To check how well the school is doing.
- To let you take tests and record your achievements.
- To follow the law (like child protection and health and safety)
- To check how you use the school's computers and internet safely.
- To share information with educational software providers that you, or your teachers, would use.
- To share information with others when the law says we have to or should do.

There are a special set of laws that schools must follow called the General Data Protection Regulations; you may have heard of these regulations on the news, or the internet.

Schools can only collect information about you if they have a lawful reason to do so.

We use Article 6 of the UK GDPR to determine the lawful basis that allows us to process your information. The ones we rely on are:

- **Public task**
The main lawful basis used for the processing of personal data is 'public task' for the delivery of pupil education.
- **Legal obligation**
The UK Parliament has set out legislation which means we must, by law, process some of your information.
- **Protecting vital interests**
Sometimes we need to process data to protect the life of an individual, like when there has been an accident, or someone has an allergic reaction.
- **Consent**
There may be times when we seek your consent to process certain types of data. This consent can be withdrawn at any time. You can withdraw by contacting the DPO detailed on this notice.
- **Legitimate interest**
We use this when processing the data is necessary for our legitimate business interests. We can't use this all the time and need to be able to prove that the 'interest' is 'legitimate' before we process information this way. For purposes outside the scope our tasks as a public authority we may consider our legitimate interests.

Note:

We process special category data under, where applicable, and together with Schedule 1 conditions in the Data Protection Act 2018 the following Article 9 bases.

- Article 9(2)(a) – Explicit consent;
- Article 9(2)(c) – Vital interests;
- Article 9(2)(f) – Legal claims;
- Article 9(2)(g) – Substantial public interest; and
- Article 9(2)(j) – Archiving purposes

Similarly, if we process *criminal offence data*, we meet the requirements of Article 10 and the Data Protection Act 2018.

How do you get my information?

In most cases your parents, carers, or responsible adult will have directly provided us with your personal information. We also receive your personal information from your previous school, nursery, and local authority.

In most cases you, or your parent/carer, will have provided the personal information we need to collect, either directly to us or indirectly via your previous school or local authority.

There are some occasions when you can choose whether to provide the data.

We will always tell you if it's optional. If you must provide the data, we will explain what might happen if you don't.

Sometimes we get data about you from where you choose to go after leaving school. This is called destination data, and we need to collect this by law. Sometimes we ask for data about you that your university of choice may collect, to better understand and support the students that might follow you.

Where do we store my information?

Schools store information in lots of different places, depending on what it is. Some will be on paper and in secure cabinets, but we also have "management information systems." This includes the system that your teacher takes the register on.

Some edtech providers, like the ones that give your schools maths and science websites to use to support your learning, might use your personal information to provide their services. Where this occurs, the school must make sure the providers are competent and compliant with the GDPR, just like we are.

Other information is stored on school computers, hard drives or in the cloud. Your data will be stored securely and only people who need to have access will have access. The school must keep your information safe as required by GDPR law.

Who do you share my information with?

Sometimes school shares information about you with other organisations. When we do, we make sure that they have a right to see your information and can keep it safe while they use it. Unless we need to share your information by law, we also make sure that they only keep your information until they're done with it.

We may share personal information about you with:

- The local authority: to meet our legal duties to share information such as concerns about pupils' safety and exclusions.
- The Department for Education collect personal data from educational settings and local authorities via various statutory data collections.
- Your family and representatives
- Educators and examining bodies.
- Regulators such as Ofsted
- Third-party service suppliers, and edtech suppliers, so that they can provide the services we have contracted them for (For example, catering providers) each contractor may also use sub-processors.
- Financial organisations
- Other schools and departments within The White Horse Federation

- Other schools and educational organisations outside of The White Horse Federation
- The central UK government and local governments
- Our auditors
- Survey and research organisations.
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies
- Parent-Teacher association
- School trips

When organising a school trip off site, for any duration, it may be relevant to share personal or special category information with third parties. The information may be in hard copy or electronic format. For international travel we comply with the UK GDPR.

I have an allergy or need to take medicine; do you tell teachers about me?

We do. For our pupils with health conditions that require them to take medicine or a tool (like an inhaler), and for students with allergies, any staff who expect to work with you will have that information.

Do you let Artificial Intelligence (AI) use my information?

We may sometimes use approved AI tools to help teachers and staff with learning, school administration, and other services.

If an AI tool uses personal information, we will make sure this is done lawfully, securely and in line with data protection law. We do not allow staff to enter your personal information into AI systems unless they have been approved by the Trust and appropriate safeguards are in place. Any important decisions that affect you will always involve human oversight and will not be made solely by AI. You continue to have the same data protection rights over your information when AI is used, and you can contact our Data Protection Officer if you have any questions about how AI is being used in school.

How long do you keep my information?

Schools must keep information for different lengths of time, depending on what it is. We have a record retention policy that we must adhere to.

The school is not allowed to keep personal information about people for longer than is necessary. When schools get rid of information, they must make sure that they do this safely so other people can't find it.

We follow a strict set of rules for how long we keep specific pieces of your information. When we no longer need to keep your information, we make sure it is securely and permanently destroyed or changed in such a way that no one will know it used to be your information.

What is the National Pupil Database?

We are required to provide information about you to the Department for Education (a government department) as part of data collections such as the school census.

Some of this information is then stored in the [National Pupil Database](#), which is managed by the Department for Education and provides evidence on how schools are performing. This, in turn, supports research.

The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards, and others.

The Department for Education may share information from the database with other organisations which promote children's education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data.

You can find more information about this on the Department for Education's webpage on [how it collects and shares research data](#).

You can also [contact the Department for Education](#) if you have any questions about the database.

What are youth support services?

Once you reach the age of 13, we are legally required to pass on certain information about you to any authority or youth support services in the local area, as it has legal responsibilities regarding the education or training of 13–19-year-olds.

This information enables it to provide youth support services, post-16 education and training services, and careers advisers.

Your parents/carers, or you once you're 16, can contact our data protection officer to ask us to only pass your name, address, and date of birth to any local authority or youth support services.

Do you send my data overseas?

If we need to share information outside the UK, we will make sure it is protected and handled safely.

We might need to do this if you're going to go on a school trip to a foreign country, or if you go on holiday abroad.

How do you keep my information safe?

We have put in place measures to protect the security of your information.

Third parties who are processing personal data on our behalf will only process your personal information on our instructions.

We have in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way including alteration or disclosure. In addition, we limit access to your personal information to employees, contractors, and third parties who have a business need to know. They only process information on our instructions.

If there is a data breach, we will notify you where we are legally required to do so.

Can I ask to see my information?

You have the right to ask for a copy of the personal information we hold about you. This is known as a Subject Access Request.

To request this, please complete the form available on our website or contact the Data Protection Officer.

Sometimes we may not be able to provide certain information if data protection law allows us to withhold it, for example where disclosure could put someone at risk of harm or affect another person's rights.

A parent or carer may also ask for information about you. When considering these requests, we will take account of your ability to make decisions about your own personal information and our legal responsibilities. We may ask for evidence that the person making the request has authority to act on your behalf.

If you have any questions about your rights, please contact the Data Protection Officer.

What other rights do I have?

You have other rights over how your personal data is used and kept safe, including the right to:

- Ask us to stop processing your information in some situations.
- Ask us to stop using your information to send you marketing materials.
- Say that you don't want it used to make automated decisions (decisions made by a computer or machine, rather than by a person)
- Have it corrected, deleted, or destroyed if it is wrong, or restrict our use of it.
- Claim compensation if the data protection rules are broken and this harms you in some way.

How can I make a complaint?

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we've done something wrong.

You can make a complaint at any time by contacting our Data Protection Officer at dpo@twhf.org.uk.

You can also complain to the Information Commissioner's Office in one of the following ways:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: 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.

Version	Date of Change	Summary of Changes
V2	Aug 2023	Updates in line with 2023 regulations
V3	Aug 2026	Added version history, updated complaints information in line with DUAA, added key sub-processors. Overhaul of all data sections to be more age-related. Added allergy, AI, and special category data sections.