# Data Privacy Notice for Parents and Carers

## Use of Pupil Data

Version: 2.5

Last Updated: 29/09/2026

We, **Grampound with Creed School**, Fore Street, Grampound, Cornwall TR2 4SB are the 'Data Controller' for the purposes of UK data protection law. Our Data Protection Officer is Glyn Pascoe (see 'Contact us' section below).

## What is a 'privacy notice'?

It's your right under UK data protection law to be informed about how organisations use your data. A privacy notice is often called a 'fair processing notice' and is designed to inform individuals when data about them is collected, held and processed. This privacy notice explains how we collect, store and process pupil data.

Typical examples of personal data are:

- Contact details such as name, address, phone numbers, email addresses
- Date of birth
- Gender
- Country of birth
- Emergency contact information
- FSM (free school meal) eligibility
- Curricular records such as assessment data
- Attendance data
- Exclusion data
- Pupil photographs, both official and those captured as part of learning evidence
- Safeguarding information including court orders or professional involvement
- Data relating to support provision received including care packages, plans and support providers e.g. external agencies.
- Usage data relating to interactions with our IT systems

The above list should be viewed as a non-exhaustive list and additional data may be stored where it is deemed relevant. Information may also be received from other organisations such as schools, authorities or the DfE (Department for Education). In addition, certain 'special categories' of more sensitive data may also be stored, including (but not limited to):

- Medical information including physical and mental health conditions
- Ethnicity and languages spoken
- Special Educational Needs
- Faith schools may collect religion as part of admission arrangements

## What is the purpose of holding the data?

- To help support pupil learning and development by reporting progress
- To provide pastoral care
- To help track pupil progress and assessment
- To ensure pupil welfare and safeguarding
- To comply with the relevant laws around data sharing and statutory reporting
- To assess and improve the quality of our teaching and support systems
- To carry out research

## Use of personal data in automated decision making and profiling?

We do not process any personal data through automated decision making or profiling.

## What is our lawful purpose?

Data must only be collected and processed when allowable by law. Typically this is when:

- We are required to process data to deliver our service as a academy
- We are required to hold data to comply with legal obligations
- It is in the public interest to do so

Where we share personal data to safeguard and promote the welfare of children, our lawful basis is legal obligation, including our duty to share information under section 16LA of the Children Act 2004, or public task. We do not need consent to share information for these reasons, and we will only share what is necessary.

In addition to the above, it is allowable to hold/process personal data when we have received consent to do so and/or the data allows us to protect your child's or someone else's vital interests.

Where we have obtained consent to use pupils' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

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

## What is our basis for using special category data?

We only collect, store and process special category data when we have both a lawful basis and one of the below conditions for processing as set out in UK data protection law:

- Explicit consent has been obtained
- Protecting an individual's vital interests in emergency cases where you are physically or legally incapable of giving consent
- The data has already been made public by you
- Processing for legal claims
- Processing it for reasons of substantial public interest as set out in the Data Protection Act 2018, for example to safeguard children and individuals at risk (Schedule 1, paragraph 18)
- Processing for health or social care purposes, and the processing is done by or under the direction of a health or social work professional or by another person obliged to act confidentially under law
- Processing for public health reasons, and the processing is done by or under the direction of a health professional or by another person obliged to act confidentially under law
- Processing for archiving purposes, scientific or historical research purposes or for statistical purposes and the processing is in the public interest.
- Performing an obligation or right in relation to employment, social security or social protection law

Criminal offence data is only collected, stored and processed when we have both a lawful basis and one of the below conditions for processing as set out in UK data protection law:

- Consent has been obtained
- Protecting an individual's vital interests in emergency cases where you are physically or legally incapable of giving consent
- The data has already been made public by you
- Processing it for or in connection with legal proceedings, to obtain legal advice or exercise or defence of established legal rights
- Processing that meets a condition in Schedule 1 of the Data Protection Act 2018, for example to safeguard children and individuals at risk (Schedule 1, paragraph 18)

## How is information collected?

Personal data will fall into two categories: mandatory (in as much as you must comply with the request to provide the data) and optional (where there is a choice whether to supply information or not). As a Data Controller, we must highlight to you which of the above scenarios is applicable.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Your parents or carers
- Police, courts, tribunals

## How is data stored?

Personal data is kept secure and is retained for the duration of a pupil's attendance at our academy. Certain data may be retained after the pupil leaves in order to comply with our legal obligations. The data will be subject to our standard retention period followed by secure disposal.

A copy of this schedule can be obtained from The Information and Records Management Society's Toolkit for Schools.

## How we share your data?

We share personal data only where the law allows it or where it is set out in our policies. We do not need consent to share information to safeguard and promote the welfare of children. The law requires us to share relevant information with the local authority, the police, health services and other safeguarding partners where it may help them to safeguard or promote a child's welfare. Where the law allows it, data can be shared with:

- Central government and our local authority, to meet our legal obligations to share certain information with them, such as safeguarding concerns and exclusions
- The Department for Education – to meet our legal obligations to share certain information with it, such as assessment data and census returns
- The pupil's family and representatives – to meet our legal obligations and comply with subject access requests
- Educators and examining bodies – to meet our legal obligations and to support pupil learning, such as SATs results
- Our regulator Ofsted – to meet our legal obligations, such as SATs results and assessment monitoring data
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as parent contact information for text/SMS/app messaging services
- Financial organisations – to enable them to provide the service we have contracted them for, such as bank account details to enable paying of invoices
- Health authorities – to provide appropriate pastoral care and to protect pupil welfare, such as attendance and medical conditions
- Health and social welfare organisations – to meet our legal obligations and to provide appropriate pastoral care and to protect pupil welfare, such as attendance, attainment and medical conditions
- Professional advisers and consultants – to support pupil learning and enable them to provide the service we have contracted them for, such as progress, attainment and attendance
- Charities and voluntary organisations – to support pupil learning and welfare, such as behavioural and social and emotional characteristics
- Police forces, courts, tribunals – to meet our legal obligations to share certain information with them, such as safeguarding

Some of your child's information is shared with NHS providers for vision screening, dental health surveys, height and weight measurement, and school nursing or immunisation programmes. If you do not want your child included in this sharing, contact the academy's Data Protection Representative and we will act on your objection

Some of the suppliers and service providers we use may process data outside the United Kingdom, including in the United States. Where this happens, we ensure that appropriate safeguards are in place as required by UK data protection law, including where applicable the UK Extension to the EU-US Data Privacy Framework.

Where pupils use online services provided or approved by the school, we take steps to ensure those services meet children's data protection requirements as set out in the Data (Use and Access) Act 2025.

## National Pupil Database

We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school/early years census. Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the Department for Education and provides evidence on school performance to inform research.

The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including federations, schools, local authorities and exam boards.

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

For more information, see the Department's webpage on how it collects and shares research data.

You can also contact the Department for Education with any further questions about the NPD.

## How can I see what personal information is held about my child? Your rights

Parents and carers can make a subject access request for their child's data where the child is not mature enough to understand their rights, or where the child has given their consent. To do so, please complete a 'subject access request'. If we do hold information about your child we will provide the following information:

- A description of the data
- A reason for holding the data
- Where we obtained the data if not from you or your child
- How long the data will be retained for
- Whether the data has been shared and with whom
- Whether any automated decision-making has been applied
- A copy of the data in an intelligible format

**Academy:**

A pupil's educational record can be obtained which typically includes the most up-to-date information about a pupil. Please note that the academy may reserve the right to charge a small admin fee to cover the generation of this report as there is no automatic legal right to access this information. Upon receiving the request, we will produce the report within 15 school days. To request access please contact the academy's Data Protection Representative.

Please note that we will only conduct searches that are reasonable and proportionate in scope. If we reasonably need you to clarify what information your request relates to, we may pause the response period until you reply, and we will let you know what is needed.

## Other rights

As a data subject, you have the right to:

- Object to how we use your data where we rely on public task or legitimate interests. We will stop unless we have compelling legitimate grounds that override your interests, rights and freedoms, or we need the data for legal claims. This right does not apply where we share information under a legal duty, for example our duty to share information to safeguard a child.
- In certain circumstances have inaccurate data corrected, removed or restrictions placed on its processing
- In certain circumstances have the data we hold about you deleted or destroyed
- In certain circumstances, be notified of a data breach
- Claim compensation for damages caused by a breach of the data protection regulations
- Make a data protection complaint directly to us using our complaints process (see Complaints process section below), and if unresolved, to the Information Commissioner's Office (ICO)
- Object to the use of your data in decisions being made by automated processes
- Prohibit your data being used to send direct marketing

- Where we process your data based on consent or contract, and that processing is automated, request that we transfer your data to you or another organisation in a structured, commonly used format (right to data portability)

To exercise any of these rights, please contact your academy's Data Protection Representative (DPR).

## Complaints process

You have a statutory right to raise a data protection complaint directly with us. You can make a complaint in any of the following ways: speak to any member of staff; telephone the school office; visit the school in person; or write to or email the DPR at the address in the Contact us section. We will acknowledge your complaint within 30 days and aim to resolve it without undue delay, keeping you informed throughout. If you remain unhappy with our response, you can refer your complaint to the ICO:

- Via their web form at: https://ico.org.uk/make-a-complaint/
- Via live chat on the ICO website
- By calling: 0303 123 1113
- In writing to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

# Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please in the first instance contact your academy's Data Protection Representative (DPR).

If you feel your concern has not been answered or you have an issue that needs to be escalated, please contact our Data Protection Officer (DPO).

Academy Data Protection Representatives:

| **School / Academy** | **Full name** | **Email address** |
|---|---|---|
| _____ | _____ | _____ |

Data Protection Officer:

**Glyn Pascoe** DPO@ict4.co.u