

Privacy Notice – For Pupils and their families

Policy Ref:	HR 008B
Purpose	
Committees	Trust Finance Business and Audit Committee
Other linked policies	Data Protection Framework and associated documents
Issue date:	June 2026
Review Date	June 2027

This document will be reviewed annually and sooner when significant changes are made to the law. Guidance from the Department for Education about school policies can be found here:

<https://www.gov.uk/government/publications/statutory-policies-for-schools-and-academy-trusts/statutory-policies-for-schools-and-academy-trusts>

What this Privacy Notice is for

1. **Victorious Academies Trust and our schools** collect, hold, use and share information about our pupils and their families. This is known as “personal data” and you have rights around that data, including knowing how and why we are processing the data. “Processing” data means from collecting, storing, using, sharing and disposing of it.
2. For the purposes of Data Protection legislation **Victorious Academies Trust** is a data controller and is registered as such with the Information Commissioner’s Office.

The types of information that we process

3. Our Trust and schools
 - Your name, date of birth, unique pupil number, and contact details including your address
 - Characteristics such as ethnicity, language, religion and identity*
 - Attendance records (sessions attended, number of absences, absence reasons and any previous schools attended)
 - Behavioural information (such as exclusions and any relevant alternative provision put in place)
 - assessment and attainment (such as National curriculum assessment results e.g. Key Stage 2 results, exam results and student performance at different data collections, and any relevant results)
 - Medical conditions we need to be aware of, including SEND, mental and physical health, doctors’ information, dental health, allergies, medication and dietary requirements*
 - Safeguarding information including notifications from the police, court orders and/or social care involvement
 - For pupils enrolling for post 14 qualifications, the Learning Records Service will give us the unique learner number (ULN) and may also give us details about your learning or qualifications.
 - Destination data (this is information about what students do after leaving the school, for example, college, university, apprenticeship, employment)
 - Post 16 learning information
 - Extra-curricular and enrichment participation
 - CCTV data
 - Photographs of you
 - Correspondence and complaints
 - Use of school devices and school networks as part of our Trust and school safeguarding procedures



- free school meal eligibility*
- other funding (Pupil Premium, Employment and Support Allowance, Disability Living Allowance, High Needs Funding and Catch Up Funding)*
- biometrics (thumb print for catering services / attendance / access to systems)* – more information about this can be found in our Protection of Biometric Information document
- information about any criminal convictions, offences and cautions*

*Items marked with an asterisk * are particularly sensitive, and so are known as special category or criminal offence data. This includes data that the Department for Education advises we treat as special category.*

Some of the legal conditions for processing special category and criminal offence data require us to have an Appropriate Policy Document ('APD') in place, setting out and explaining our procedures for securing compliance with the data protection principles and to have policies regarding the retention and erasure of such personal data. This document is our Special Category Data Policy Document and should be read alongside this Privacy Notice.

~~Special category data (Sensitive information)~~

~~This may include:~~

- ~~• characteristics (including ethnicity and language)~~
- ~~• safeguarding information (such as court orders and professional involvement)~~
- ~~• special educational needs (including the needs and ranking)~~
- ~~• medical information that we need to be aware of (including your Doctor's information, child health, dental health, allergies, medication and dietary requirements)~~
- ~~• free school meal eligibility~~
- ~~• other funding (Pupil Premium, ESA, High Needs Funding and Catch Up Funding)~~

Why we collect and use your information

Pupil information

- We collect and use your information:
 - to support your learning
 - to monitor and report on pupil attainment progress
 - to provide appropriate pastoral care
 - to assess the quality of our services
 - to keep children safe
 - photos are used for identification purposes (safeguarding), and celebration purposes (to record work, classes and school events)
 - to meet the legal duties placed upon us by the Department for Education
 - to comply with the law in general
 - for site safety and security
 - to protect public monies against fraud
 - to streamline systems

Family information

- We collect and use information about our pupils' families:
 - to fulfil our legal obligations
 - for the admissions process
 - for communication and reporting purposes
 - for safeguarding and welfare purposes
 - to keep families informed about events and emergencies

- in order to process payments
 - to gather feedback about our work
6. Under the General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing pupil and family information are:
 - Article 6(a) – Your consent (for anything which does not fall into the purposes explained below)
 - Article 6(c) - Compliance with our legal obligations as set out in the Education Act 1996 (as amended). We are required to share information about our pupils with the (DfE) under regulation 3 of The Education (Information About Individual Pupils) (England) Regulations 2013. In addition, there are extensive statutory obligations that a school is subject to – further details about these are available from our Data Protection Officer.
 - Being necessary for us to carry out tasks that are in the Public Interest
 - Article 6(d) - Being necessary for us to protect your, or someone else's, Vital Interests (potentially lifesaving)
 - Article 6(e) - Being necessary for us to carry out tasks that are in the Public Interest
 7. The ways we collect and use sensitive pupil and family information are lawful based on Articles 9 and 10 of UK GDPR. Please see our Special Category Data Policy document for full details of these lawful bases for processing this data.
 8. Where we are processing your personal data with your consent, you have the right to withdraw that consent.
 9. The ways we collect and use sensitive pupil and family information are lawful based on: your explicit consent; for compliance with certain legal obligations, or for exercising certain legal rights; for protecting a person's vital interests in an emergency; for health and public health reasons; or for carrying out tasks that are in the substantial public interest including for safeguarding purposes.
 10. Please see our Special Category Data Policy document for full details of these lawful bases for processing this data.

Marketing purposes

11. Where a family member gives us consent, we may send them marketing information by text message or email, such as for promoting school events, campaigns or charities. Consent can be withdrawn at any time by contacting us (see the Contacts section) or by [schools insert any other method utilised to gather/manage consent eg Microsoft/Google form link].

Automated decision making and profiling

12. We don't use any of your personal information to make automated decisions about you, or to profile you. If this changes in the future, privacy notices will be updated to explain both the processing and your right to object to it. [Schools – if you are processing in this manner, discuss with the DPO team immediately who will provide advice around the wording of this section and ensure other documentation, such as DPIA is in place]

How we collect pupil and family information

13. We collect pupil and family information using admission forms completed by parent/carers when a pupil joins our school, data collection forms, CCTV cameras, information produced from our day-to-day interaction with pupils, and other information provided by; parents/carers, the previous



school/provisions, local authorities, NHS, Police, the Department for Education (DfE) and by secure file transfer Common Transfer File (CTF).

14. We sometimes audio/ video record sessions/lessons/assessments for pupil or staff development and assessment. This will generate personal data including pupil images, names, contributions, and will be protected, processed, and retained in the same way as all personal data, in line with our Trust's Data Protection Policies and in accordance with our other policies including Acceptable Use, Off Site Working and Bring Your Own Device policies, as well as our Retention Schedule.
15. Whilst most of the pupil information you provide to us is mandatory, some of it is requested on a voluntary basis. We will let you know, when we ask you for information, whether you are required to provide the information and your rights in relation to this.

How, where and for how long we store pupil and family information

16. We store pupil and family information securely on the School's IT network (Schools, please indicate where this is hosted, cloud based? Run by which provider? Safeguards in place?). Secure storage is provided for paper based records.
17. We only keep the information for the length of time we need it for, as shown in our data retention schedule. For more information on our data retention schedule, please visit: [Insert link to retention document]
18. We are currently following the instructions of the Independent Inquiry into Child Sexual Abuse (IICSA) which states that student records should not be destroyed until this inquiry is complete.
19. We dispose of personal information securely when we no longer need it.

Who we share pupil information with

20. We may routinely share pupil information with:
 - Schools that the pupils attend after leaving us
 - Feeder schools
 - Our local authority
 - Other relevant local authorities
 - Our Trust Board and Local Governing Boards
 - Universities
 - Employers/training providers where references are requested
 - Work experience providers
 - Government bodies including The Department for Education (DfE) Inc. Learner Record Services and the National Pupil Database and the Teaching Regulation Agency
 - Law enforcement agencies, such as the Police
 - NHS (agencies and services)/School Nurse
 - External systems used by our schools to carry out day to day processes and requirements. For example, and not limited to; Arbor, Every, SIMS, Teachers to Parents, parent portal – Insight, School payments.
21. For information about who specifically we share your child's information with please ask at the school office.

School immunisation programme

22. We will need to provide data to support immunisation programmes in our school. This includes:
 - sharing information leaflets and consent forms with parents or carers
 - providing a list of eligible children and young people, and their parent's or carer's contact details to the School Age Immunisation Service (SAIS) team
23. Sharing these contact details does not mean that a vaccine will be given. A parent or carer will need to give their consent for a vaccine to be given to their child.
24. There is a lawful basis for schools to share information with school immunisation teams under article 6(1)(e) of UK GDPR. This states that the information can be shared if "processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller".
25. This means that we can share this information with immunisation programmes as it is in the public interest.
26. Sharing information with immunisation programmes is part of the exercise of a school's official authority. Schools also have a duty to support wider public health.
27. Data protection laws do not prevent us from sharing personal data where it is appropriate to do so in a fair and lawful way, and in this instance, it is beneficial to do so.

International Transfers

28. Your personal information may be transferred outside the UK and the European Economic Area ('EEA'), including to the United States. Where information is transferred outside the UK or EEA to a country that is not designated as "adequate" in relation to data protection law, subject to an adequacy decision by the EU Commission, the information is adequately protected by the use of International Data Transfer Agreements and security measures, and other appropriate safeguards. EU Commission approved standard contractual clauses or a vendor's Processor Binding Corporate Rules. For more information on the international transfers mechanism used, please contact us at the details set out below.

Freedom of Information Act and Environmental Information Regulations 2004

29. As a public body, our Trust and schools are subject to requests made under the above legislation. However, we will never disclose personal data in our responses to these requests where to do so would contravene the principles of data protection.

Why we regularly share pupil and family information

30. We do not share information about our pupils and families with anyone without consent unless the law and our policies allow us to do so.

Department for Education

31. 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 regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

32. All data is transferred securely and held by DfE under a combination of software and hardware controls, which meet the current government security policy framework.
33. For more information, please see 'How Government uses your data' section.

Local Authorities

34. 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.
 - safeguarding of children/young people
 - supporting children and young people who are eligible for SEND related provision
 - promoting the education, employment and training of young people which requires the exchange of data and the use of information not otherwise available to either organisation.
 - census, Early Years Foundation Stage, Phonics, and other key stage pupil attainment data.
 - to identify where pupils have transferred to make the task of tracking vulnerable pupils more secure and also to ensure appropriate services are extended to pupils needing additional support e.g., for reasons of health, exclusions, attendance or transport.

Requesting access to your personal data, and other rights

35. Under data protection law, pupils have the right to request access to information about them that we hold, and in some cases, parents can make the request on the pupil's behalf, although this will be subject to the pupil's consent if they are deemed to be competent to understand the request and any implications. [primaries delete].
36. Parents also have the right to access their child's educational record. (academies delete)
37. Family members/carers also have the right to request access to information about them that we hold.
38. You also have the right to:
- be informed about the collection and use of your personal data.
 - have inaccurate personal data changed, or completed if it is incomplete.
 - erasure, often known as the 'right to be forgotten'; however this does not apply where, amongst other things, processing is necessary to comply with a legal obligation.
 - restrict the way we are using your information, although, as above this is a limited right.
 - object to the way we are using your information; though other than for marketing purposes, this is also limited as above.
 - Where we rely on your consent to collect and use your data, you have the right to withdraw that consent. If you do change your mind, or you are unhappy with our use of your personal data, please let us know – our contacts are in section 2.14 at the end of this document.
 - You also have rights in relation to automated decision making and profiling, though these are not currently relevant as we don't carry out automated decision making or profiling.
 - Finally, the right to complain about the way we use your personal information to the ICO, or to seek compensation through the courts
39. If you would like to request access to your data, or use any of the other rights listed above, please contact the school office in the first instance.

How Government uses your data

Privacy information: parents and legal guardians - GOV.UK (www.gov.uk)

40. The pupil data that we lawfully share with the 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)
41. For all information relating to how the DfE uses student information please visit:
[How DfE shares personal data GOV.UK](#)
42. For all information relating to how the DfE uses parent, carer and legal guardian information please visit:
[Privacy information: parents, carers and legal guardians - GOV.UK](#)

Your information rights under UK General Data Protection Regulation (UK GDPR) when the Department for Education collects your personal data

43. UK General Data Protection Regulation (UK GDPR) gives you certain rights about how your information is collected and used. The Department for Education (DfE) must have a valid reason to collect your personal data. These reasons are called the lawful basis in UK GDPR. You have different rights depending on the DfE's reason to collect your personal data. For more information, please visit: [Your information rights under UK GDPR - GOV.UK](#)

Data collection requirements

44. To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to
<https://www.gov.uk/education/data-collection-and-censuses-for-schools>

The National Pupil Database (NPD)

45. 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.
46. 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.
47. 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

48. The law allows the Department to share pupils' and family personal data with certain third parties, including:
- schools
 - local authorities
 - researchers
 - organisations connected with promoting the education or wellbeing of children in England
 - other government departments and agencies
 - organisations fighting or identifying crime
49. For more information about the Department for Education's (DfE) NPD data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>
50. Organisations fighting or identifying crime may use their legal powers to contact the Department for Education (DfE) to request access to individual level information relevant to detecting that crime.
51. For information about which organisations the Department for Education (DfE) has provided pupil information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the Police please visit the following website: <https://www.gov.uk/government/publications/dfe-external-data-shares>

Sharing data for the purposes of the DfE breakfast club provision

52. The schools must record daily take up (attendance) of their breakfast club during a one-week period each term.

Education and Child Health Insights from Linked Data (ECHILD)

53. The ECHILD project originated at University College London (UCL) and was created in partnership with NHS England (NHSE) and DfE. The ECHILD project links education and health data together to provide an evidence base to allow policy makers to better understand how health can impact education and how education can affect health.
54. ECHILD holds different categories of data for different cohorts of individuals depending on the nature of their interactions with the education, children's services and health sectors. The data sources included are: national pupil database, Hospital episode statistics, mental health services data, community services data and maternity services data. Data may be shared between the DfE, University College London (UCL) and NHS England (NHSE)
55. For more information about ECHILD, please visit: [Privacy information notice: Education and Child Health Insights from Linked Data \(ECHILD\) - GOV.UK](#)

How to find out what personal information DfE hold about you

56. Under the terms of the UK GDPR, you are 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
57. If you want to see the personal data held about you by the Department, you should make a 'subject

access request'. Further information on how to do this can be found within the Department's 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>

To contact DfE: <https://www.gov.uk/contact-dfe>

Data collection requirements

- To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

The National Pupil Database (NPD)

Much of the data about pupils in England goes on to be held in the National Pupil Database (NPD).

The NPD is owned and managed by the Department for Education and contains information about pupils in schools 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.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

Sharing by the Department

The law allows the Department to share pupils' personal data with certain third parties, including:

- schools
- local authorities
- researchers
- organisations connected with promoting the education or wellbeing of children in England
- other government departments and agencies
- organisations fighting or identifying crime

For more information about the Department's NPD data sharing process, please visit <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>.

Organisations fighting or identifying crime may use their legal powers to contact DfE to request access to individual level information relevant to detecting that crime. Whilst numbers fluctuate slightly over time, DfE typically supplies data on around 600 pupils per year to the Home Office and roughly 1 per year to the Police.

For information about which organisations the Department has provided pupil information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the Police please visit the following website: <https://www.gov.uk/government/publications/dfe-external-data-shares>

How to find out what personal information DfE hold about you

Under the terms of the Data Protection Act 2018, you are entitled to ask the Department:

- 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, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at this address

~~<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>~~

~~To contact DfE: <https://www.gov.uk/contact-dfe>~~

Contacts

58. If you have a concern about the way we are collecting or using your personal data or you would like to discuss anything in this privacy notice, we ask that you raise your concern with us in the first instance.
59. Please contact the School Office, Headteacher / Principal or School Data Protection Officer:
Data Protection Officer Education Data Hub (Data Protection), Derbyshire County Council
DPO Email: dpforschools@derbyshire.gov.uk
DPO Phone: 01629 532888
DPO Address: County Hall, Smedley Street, Matlock, Derbyshire, DE4 3AG
60. For Derbyshire County Council: Information Governance Officer, Children's Services Department, Derbyshire County Council. County Hall. Matlock. Derbyshire, DE4 3AG
Email: cs.dpandfoi@derbyshire.gov.uk
Telephone: 01629 536906
61. For DfE: Public Communications Unit, Department for Education, Sanctuary Buildings, Great Smith Street, London, SW1P 3BT
Website: www.education.gov.uk
~~<https://www.gov.uk/contact-dfe>~~
Email: ~~<http://www.education.gov.uk>~~
Telephone: 0370 000 2288
62. If however you are dissatisfied with our response to your concerns you can of course contact the ICO quoting our ICO registration number **ZA116828** and stating that the Data Controller is **Victorious Academies Trust**.
Information Commissioners' Office, Wycliffe House., Water Lane, Wilmslow, Cheshire, SK9 5AF
Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number
Fax: 01625 524 510
Website: <https://ico.org.uk/concerns/>

Last updated

63. We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time.

End