POLICY DOCUMENT

Privacy Notice for Pupils and Parents

How Princess May Primary School collects and uses information about pupils and their parents and carers — 2026–2027

Governing Body Representative (GBR)	Kristofer McGhee (Chair of Governors)
Signed by (GBR)	……
Date approved	Awaiting governor approval (3 December 2026)
Next review due by	September 2027
Related policies	Data Protection Policy; Data Breach Policy; Data Retention Policy; Information Security Policy; CCTV Policy; Online Safety Policy
Aligned to	UK GDPR; Data Protection Act 2018; Data (Use and Access) Act 2025; Judicium Education model privacy notice (September 2026)

This privacy notice describes how we collect and use personal information about pupils, in accordance with the UK General Data Protection Regulation (UK GDPR), section 537A of the Education Act 1996 and section 83 of the Children Act 1989.

The UK GDPR operates alongside the Data Protection Act 2018, which supplements it by setting out additional provisions on matters such as the processing of personal data in specific sectors, exemptions, the powers of the Information Commission, and enforcement. The Data (Use and Access) Act 2025 further amends both the UK GDPR and the Data Protection Act 2018 to modernise UK data protection rules and clarify certain rights and obligations.

This notice applies to all pupils and their parents and carers.

1. Who Collects this Information

Princess May Primary School is a “data controller” of personal data and gathers and uses certain information about pupils and parents. This means that we are responsible for deciding how we hold and use personal information about pupils and parents. Under data protection legislation, we are required to notify you of the information contained in this privacy notice.

This notice does not form part of any contract to provide services and we may update this notice at any time.

It is important that you read this notice with any other policies mentioned within this privacy notice, so that you are aware of how and why we are processing your information, what your rights are under data protection legislation and the procedures we take to protect your personal data.

2. Data Protection Principles

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection Policy.

3. Categories of Pupil Information We Collect, Process, Hold and Share

We may collect, store and use the following categories of personal information:

- Personal information such as name, pupil number, date of birth, gender and contact information;
- Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses;
- Characteristics (such as language and free school meal eligibility);
- Attendance details (such as sessions attended, number of absences and reasons for absence);
- Performance and assessment information;
- Behavioural information (including suspensions and exclusions);
- Safeguarding information;
- Images of pupils engaging in school activities, and images captured by the school’s CCTV system;
- Information about the use of our IT, communications and other systems, and other monitoring information;
- Financial details (such as payments for meals, trips and clubs);
- Recordings of pupils and/or parents from the school’s video conferencing platform.

We may also collect, store and use the following more sensitive types of personal information:

- Information about race or ethnicity, and religious or philosophical beliefs;
- Information about health, including any medical conditions, allergies and sickness records;
- Special educational needs and disability information.

4. How We Collect this Information

Whilst the majority of the information you provide to us is mandatory, some of it is provided to us on a voluntary basis. To comply with the UK GDPR, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

It is important that the personal information we hold is accurate and current. Please keep us informed if your or your child's personal information changes while your child attends our school.

5. How and Why We Use Your Personal Information

We will only use your personal information when the law allows us to do so. Most commonly, we will hold pupil data and use it for:

- Pupil admissions (and to confirm the identity of prospective pupils and their parents);
- Providing education services and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Informing decisions such as the funding of schools;
- Assessing performance and setting targets for schools;
- Safeguarding pupils' welfare and providing appropriate pastoral (and, where necessary, medical) care;
- Supporting teaching and learning;
- Giving and receiving information and references about past, current and prospective pupils;
- Managing internal policy and procedure;
- Enabling pupils to take part in statutory assessments, and recording pupil achievements;
- Carrying out statistical analysis for diversity purposes;
- Legal and regulatory purposes (for example, child protection, diversity monitoring and health and safety) and complying with legal obligations and duties of care;
- Enabling relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate;
- Monitoring use of the school's IT and communications systems in accordance with our Information Security Policy and Online Safety Policy;
- Making use of photographic images of pupils in school publications, on the school website and on social media channels;
- Security purposes, including CCTV;
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school; and
- Providing support to pupils after they leave the school.

6. The Lawful Bases on which We Use this Information

We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Consent: the individual has given clear consent to process their personal data for a specific purpose;
- Contract: the processing is necessary for a contract with the individual;
- Legal obligation: the processing is necessary to comply with the law (not including contractual obligations);
- Vital interests: the processing is necessary to protect someone's life;
- Public task: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law; and
- The Education Act 1996: for Departmental Censuses three times a year. More information can be found at www.gov.uk/education/data-collection-and-censuses-for-schools.

We mainly use pupils' personal data to comply with legal obligations and to perform tasks carried out in the public interest. Please note that we may process information without knowledge or consent, where this is required or permitted by law.

7. How We Use Particularly Sensitive Personal Information

Special categories of particularly sensitive personal information, such as information about health, racial or ethnic origin or sexual orientation (defined under the UK GDPR as "special category data"), require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations in line with our Data Protection Policy;
- For reasons of substantial public interest, such as for equal opportunities monitoring;
- Where necessary to establish, exercise or defend legal claims;
- Where necessary to protect your vital interests (or those of another person) and you are unable to consent.

8. Sharing Data

We may need to share your data with third parties where it is necessary. There are strict controls on who can see your information. We will not share your data if you have advised us that you do not want it shared, unless we have compelling reasons to continue sharing it which override your rights and interests, it is the only way we can make sure you stay safe and healthy, or we are legally required to do so.

We share pupil information with:

- The Department for Education (DfE), on a statutory basis under section 3 of the Education (Information About Individual Pupils) (England) Regulations 2013;
- Ofsted;
- Other schools that pupils have attended or will attend;
- The NHS;
- Welfare services (such as children's social care);
- Law enforcement officials, such as the police and HMRC;
- The Local Authority Designated Officer (LADO);
- Professional advisers, such as lawyers and consultants;
- Support services (including insurance, IT support and information security);
- Providers of our school systems and learning software, such as Arbor (our management information system) and CPOMS (our safeguarding record system); and
- The local authority (Hackney Education).

The Department for Education requests regular data sharing on pupil attendance to help support vulnerable pupils and to assist with intervention strategies. Further information on how the Department for Education collects this data is available on the school website.

Information will be provided to those agencies securely and/or anonymised where possible. The recipient of the information will be bound by confidentiality obligations; we require them to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the UK and the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

9. Automated Decision Making

Automated decision making takes place when an electronic system uses personal information to make a decision without human intervention. We are required to ensure that appropriate safeguards are in place when using automated decision making for significant decisions, and the circumstances in which we are permitted to use special category data (sensitive information) in automated decision making are limited.

You will not be subject to automated decision making for significant decisions unless we have a lawful basis, and a valid condition where required, for doing so and appropriate safeguards are in place. Appropriate safeguards include informing the relevant individuals about the automated decision making and their rights to request a human review, express their views, and contest the decision.

10. Retention Periods

Except as otherwise permitted or required by applicable law or regulation, the school only retains personal data for as long as necessary to fulfil the purposes for which it was collected, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

Information about how we retain information can be found in our Data Retention Policy, available on the Data Protection page of our website (www.princessmay.hackney.sch.uk/GDPR-POLICIES/).

11. Security

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

You can find further details of our security procedures within our Data Breach Policy and our Information Security Policy, which can be found on the Data Protection page of our website (www.princessmay.hackney.sch.uk/GDPR-POLICIES/).

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your or your child's personal information changes while your child attends our school.

12. The National Pupil Database

The National Pupil Database (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.

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 NPD, go to 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; or
- 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 to and use of the data. Decisions on whether the 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 www.gov.uk/data-protection-how-we-collect-and-share-research-data. For information about which organisations the Department has provided pupil information to (and for which project), please visit www.gov.uk/government/publications/national-pupil-database-requests-received. To contact the DfE: www.gov.uk/contact-dfe.

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 to be given access to your child's educational record, contact Marilyn Richards (Bursar), at admin@princessmay.hackney.sch.uk or on 020 7254 1589.

13. Your Rights of Access, Correction, Erasure and Restriction

Under certain circumstances, by law you have the right to:

- Access your personal information (commonly known as a "subject access request"). This allows you to receive a copy of the personal information we hold about you and to check we are lawfully processing it. You will not have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.
- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it.
- Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
- To object to processing in certain circumstances (for example, for direct marketing purposes).
- To transfer your personal information to another party.

If you want to exercise any of the above rights, please contact Marilyn Richards (Bursar), at admin@princessmay.hackney.sch.uk or on 020 7254 1589, in writing.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

14. Right to Withdraw Consent

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Marilyn Richards (Bursar), at admin@princessmay.hackney.sch.uk or on 020 7254 1589. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

15. Contact

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with Marilyn Richards (Bursar), at admin@princessmay.hackney.sch.uk or on 020 7254 1589, in the first instance. We will acknowledge receipt of your complaint within 30 calendar days, and we will investigate and respond without undue delay. Further information about the way we handle data protection complaints can be found in our Data Protection Policy, available on the Data Protection page of our website (www.princessmay.hackney.sch.uk/GDPR-POLICIES/).

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by Marilyn Richards, you can contact the DPO on the details below:

Data Protection Officer	Judicium Consulting Limited
Address	5th Floor, 98 Theobalds Road, London WC1X 8WB
Email	dataservices@judicium.com
Telephone	0345 548 7000
Web	www.judiciumeducation.co.uk

Should you remain dissatisfied with our response, you also have the right to make a complaint to the Information Commission (formerly the Information Commissioner's Office, ICO), the UK supervisory authority for data protection issues, at ico.org.uk.

16. Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.