



School Privacy Notice for Secondary School Pupils and their Parents

Approved by: Governing Board

Date: 4 March 2026

Last reviewed by: C Davies
on: 4 March 2026

Next review due by: March 2028

This Policy should be read in conjunction with the following:

- Freedom of Information Policy
- GDPR Policy
- Privacy Notice – Staff, Governors & Volunteers
- Digital Systems Policy

Introduction

This Privacy Notice describes how the school gathers and processes personal data relating to parents and pupils at the school in its role as a 'data controller' under Data Protection legislation.

The processing of personal information by the school is predominantly for statutory provision of education in a safe environment. The processing assists in the provision of the pupil's education and in the safeguarding and welfare of that child.

What information is processed

The categories of pupil and parent data collected and processed include:

- personal information of pupil and parent/carer (name, contact details, age and unique pupil number)
- specific characteristics (ethnicity, language, nationality, country of birth and eligibility for free school meals)
- attendance record (sessions attended, absences and absence reasons)
- relevant medical or dietary information (doctor information, medical conditions allergies, medication and dietary requirements)
- special educational needs and disability information
- behavioural information (rewards, sanctions, exclusions)
- safeguarding information (court orders and involvement of other professionals)
- video and audio recordings, including CCTV images

What is the information used for

The data is used to:

- keep the pupil safe
- meet the school's statutory duties
- monitor and report on pupil progress
- support pupil learning
- provide pastoral care and support
- assess the quality of the school's teaching and learning
- meet statutory requirements for the sharing of pupil data
- provide effective catering services
- provide payment and booking systems for catering, photographs, activities and trips

What is the legal basis for the processing

The school processes pupil and parent data to meet the statutory obligation to provide education to the pupil in a safe environment. The legal basis for processing parent and pupil data is detailed below:

Legal Obligation – school admission, sharing data with the DfE and the Local Authority, special educational needs and keeping children safe in education.

Public Task – sharing of data with other schools in support of education and transition, monitoring of attendance and behaviour, use of online learning applications and tools to support the administration of the school and the learning of pupils, use of CCTV to protect parents and pupils.

Consent – where another legal basis is not already in place, such as school photographs, video and audio recordings, healthcare plans and the external sharing of personal information. Consent is gathered from parents and can be withdrawn at any time by emailing office@downlands.w-sussex.sch.uk.

Legitimate Interest – such as contact with parents to provide important information, the gathering of financial information to provide appropriate catering and activities.

How long is data held

Pupil data is held in accordance with the school's Retention Schedule. Pupil data is normally transferred with the child to their new school, but in some instances (such as accident reports) information may be held longer when a legal basis is present. The Retention Schedule identifies how long data is held by the school for all processing activities.

Who is the information shared with

Pupil data is shared with:

- the next school that the pupil joins, for the on-going continuity of education
- West Sussex County Council, for the monitoring and improvement of educational standards
- the Department for Education (DfE) and the National Pupil Database, for the evaluation of educational attainment, funding and policy development at a National level
- the School Nurse, for the monitoring of pupil health
- catering provider, for the provision of meals
- the providers of educational software, for the support and improvement of educational standards
- parental communication tools
- Police, Social Services and other appropriate professional groups

How can I access my data

Data protection legislation gives individuals 8 specific rights, which include the right to access their data. The school has a Subject Access Request process in place that it will use to support parents to access their child's information. To make a request for your personal information or to exercise any of your individual rights, please contact the school office.

The other rights allow parents (in some instances) to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- have inaccurate personal data rectified, restricted or erased
- claim compensation for damages caused by a breach of the Data Protection regulations

Data Protection Officer

The Data Protection Officer for the school is:

Claire Davies – GDPR Practitioner and DPO liaison
cdavies@downlands.org

The school has appointed an independent Data Protection Officer as its DPO. However, please contact the school in the first instance if you have a query regarding this Privacy Notice or how your information is used.

Further information about the Principles of GDPR, the Rights of Individuals and the legal basis for processing data is available in the School Data Protection Policy