

INCLUSIVE | MULTI ACADEMY TRUST

Privacy Notice for pupils and their families (How we use pupil information)

DOCUMENT DETAIL	
Approving Body	Executive Leaders
Author	Sharon Carlyon
Scheduled Review	Annually
Date of Policy	July 2026
Next review	July 2027

Introduction

Under data protection law, individuals have a right to be informed about how the Trust uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about pupils within our Trust.

The Inclusive Multi Academy Trust is the 'data controller' for the purposes of data protection law.

Our Data Protection Officer is Andrew Chappell (see 'Contact us' below).

The categories of pupil information that we process

We process data relating to pupils and their families within our Trust. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- characteristics (such as ethnicity, language, and free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- special educational needs (including the needs and ranking)
- medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (such as key stage results, phonics results, post-16 courses enrolled for and any relevant results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- images and photographs (for example for school records, yearbooks, or marketing and social media, where consent has been given)
- trips, clubs and extra-curricular activities
- catering and free school meal management
- ICT and device usage information (such as device allocation, log-in and authentication details, and usage data relating to school-issued devices, including Chromebooks)

This list is not exhaustive. This list is not exhaustive. Should we wish to query any data held please speak to the Trusts Chief Operating Officer.

Why we collect and use pupil information

The personal data collected is essential, for the school to fulfil their official functions and meet legal requirements.

We collect and use pupil information, for the following purposes:

- to support pupil 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 (food allergies, or emergency contact details)
- to meet the statutory duties placed upon us by the Department for Education (DfE), including statutory data collections

Our legal basis for using this data

We will only collect and use your information when the law allows us to. Most often, we will use your information where we:

- need to comply with the law
- need to use it to carry out a task in the public interest (in order to provide you with an education)

Sometimes, we may also use your personal information where:

- you, or parents/carers, have given us permission to use it in a certain way
- we need to protect your interests (or someone else's interests)

Where we process special category data (such as information about a pupil's health, ethnicity or safeguarding circumstances), we do so in accordance with Article 9 of the UK GDPR, most commonly relying on the conditions for reasons of substantial public interest, or because it is necessary to protect a pupil's vital interests.

Where we have got permission to use your data, you or your parents/carers may withdraw this at any time. We will make this clear when we ask for permission and explain how to go about withdrawing consent.

Some of the reasons listed above for collecting and using your information overlap, and there may be several grounds which mean we can use your data.

Collecting pupil information

We collect pupil information via registration and admission forms completed by parents/carers when a child joins one of our schools, and via information transferred securely from a pupil's previous school, for example using the Common Transfer File (CTF).

Pupil data is essential for the schools' operational use. Whilst the majority of information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this, and we will tell you what you need to do if you do not want to share this information with us.

Storing pupil data

We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please read our Data Protection and Data Records Management and Retention Policies, available [on our website](#).

Who we share pupil information with

We routinely share pupil information with:

- schools that our pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- Ofsted
- family and representatives
- educators and examining bodies
- suppliers and service providers, so that they can provide the services we have contracted them for
- financial organisations and our auditors
- survey and research organisations
- health and social welfare organisations

- security organisations
- professional advisers and consultants
- charities and voluntary organisations
- police forces, courts and tribunals
- professional bodies

Why we regularly share pupil information

We do not share personal information about our pupils with anyone without permission from you, unless the law and our policies allow us to do so.

Where it is legally required, or necessary for another reason allowed under data protection law, we share information with the organisations listed above to comply with the law, to carry out a task in the public interest, or to protect your interests (or someone else's interest).

Department for Education (DfE)

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 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.

All data is transferred securely and held by the DfE under a combination of software and hardware controls which meet the current [government security policy framework](#).

For more information, please see 'How Government uses your data' below.

Requesting access to your personal data

The UK GDPR gives parents and pupils certain rights about how their information is collected and used. To make a request for your personal information, or be given access to your child's educational record, contact our Data Protection Officer, Andrew Chappell, at dpo@inclusivemat.co.uk.

You also have the following rights:

- the right to be informed about the collection and use of your personal data (the 'right to be informed')
- the right to ask us for copies of your personal information (the 'right of access', also known as a subject access request or SAR)
- the right to ask us to change any information you think is inaccurate or incomplete (the 'right to rectification')
- the right to ask us to delete your personal information (the 'right to erasure')
- the right to ask us to stop using your information (the 'right to restriction of processing')
- the right to object to processing of your information, in certain circumstances
- rights in relation to automated decision-making and profiling
- the right to withdraw consent at any time, where relevant
- the right to complain to the Information Commissioner's Office if you feel we have not used your information in the right way

There are legitimate reasons why we may need to refuse an information rights request, depending on the reason we are processing your data. For example:

- the right to erasure does not apply when the lawful basis for processing is legal obligation or public task

- the right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests; and where the lawful basis is consent, you do not have the right to object, but you do have the right to withdraw consent

If you have a concern about the way we are collecting or using your personal data, you should raise this with us in the first instance, or you can raise it directly with the Information Commissioner's Office (see 'Complaints' below).

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice

Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw that consent at any time. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting our Data Protection Officer, Andrew Chappell, at dpo@inclusivemat.co.uk.

Last updated

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated in July 2026.

Contact

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer:

Andrew Chappell -- dpo@inclusivemat.co.uk

How Government uses your data

The pupil data that we lawfully share with the Department for Education (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 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)

Data collection requirements

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

The National Pupil Database (NPD)

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.

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.

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 (DfE)

DfE will only share pupils' personal data where it is lawful, secure and ethical to do so. Where these conditions are met, the law allows DfE to share pupils' personal data with certain third parties, including:

- schools and 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 for Education's NPD data sharing process, please visit <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

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

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

How to find out what personal information the DfE holds about you

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

If you want to see the personal data held about you by the Department for Education (DfE), you should make a 'subject access request'. See the guide for details: <https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

Further information on what personal information the Department for Education (DfE) holds about you published in the privacy notices for early years foundation stage to key stage 3, and key stage 4 and 5 and adult education. These are available below: <https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3>

<https://www.gov.uk/government/publications/privacy-information-key-stage-4-and-5-and-adult-education> To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>