Hardenhuish School

Privacy Notice for Pupils and Parents

Contents

About this Privacy Notice 2

The personal data we hold (categories of personal data) 2

Our lawful reasons for processing pupil/parent information (lawful bases) 2

Special category (sensitive) personal information 3

Criminal convictions 4

Collecting pupil/parent information: Why do we collect and use your information? 4

Whom we share pupil information with 4

Pupils aged 13+ 5

Pupils aged 16+ [For use by educational settings with students aged 16+:] 5

Storing pupil and parent data 7

Transferring data internationally 7

Requesting access to your personal data 7

Other rights 8

Contact and Complaints 9

Updates to our Privacy Notice 9

Appendix 1: Non- exhaustive list of examples of the types of personal data which we collect about pupils and parents 10

Appendix 2: Examples of the purposes for which we process your data ..... **Error! Bookmark not defined.**

Appendix 3: Ways in which we collect pupil and parent information ..... **Error! Bookmark not defined.**

Appendix 4: Examples of whom we may share your data with where the law permits (non – exhaustive list) 11

About this Privacy Notice

Individuals have a legal right to be informed about how we use their personal information. This Privacy Notice explains how we collect, store and use personal information. It is intended for pupils and parents (including carers or guardians who we refer to in this privacy notice as 'parents') and we encourage all to read it. We have produced a separate privacy notice for the school's workforce **and a shorter, simpler notice for pupils themselves.**

Our aim is to always provide clear information about the personal information we are using and why we are using it. We have tried to keep the language in this privacy notice as simple as possible, however if anything is unclear or if you have any concerns then please contact the Administration Manager @ admin@hardenhuish.wilts.sch.uk.

This is the school's main 'overarching' privacy notice and it applies generally to the personal information that we collect and use. It is based on the model privacy notice produced for schools by the Department for Education (DfE). Unless there is a lawful reason not to do so, we will also provide more specific privacy information at the point at which we collect or use personal information, for example if we collect personal data via an online or paper form.

Whilst much of the personal information that we collect is mandatory (i.e. it must be provided so that we can manage the school, fulfil our legal obligations and provide an education), some of it is requested on a voluntary basis. Where this is the case, we will request consent at the point we collect the information. We will explain to you whether there is a requirement to provide certain information to us, or whether you have a choice in doing so.

For the purposes of data protection law, Hardenhuish School is the 'data controller'. **Our Data Protection Officer is One West,** contact details are provided at the end of this privacy notice.

The personal data we hold (categories of personal data)

We process personal information to be able to run the school, to provide pupils with an education and to make sure that we can look after our pupils appropriately. We may collect information directly from pupils or parents or from other places including other schools, the local council and the Department for Education (DfE). Examples of the types of personal data that we may collect, use, store and share (when appropriate) are listed at **Appendix 1.**

Our lawful reasons for processing pupil/parent information (lawful bases)

Data Protection law requires us to have a lawful reason ('lawful basis') for processing the personal data we use. These reasons are listed under Article 6 of the 'General Data Protection Regulation' (GDPR). Our lawful basis for processing will be explained at the point at which we collect personal information unless there is a lawful reason not to do so (for example where it is for the prevention or detection of crime).

Hardenhuish School processes a wide range of personal data for a variety of purposes, as described above. The lawful bases we rely on will therefore vary. However, generally, the lawful bases we mainly use in relation to pupils and parents are:

- **We need to comply with the law (we have a legal obligation):** for example, we collect and use pupil information under legal and statutory obligations within the Education Act 1996, The Children Act 2004; Education and Inspections Act 2006; Education Act 2011; the Family and Children Act 2014 and Keeping Children Safe in Education (KCSIE).

- **We need to carry out a task in the public interest:** for example, the collection and use of pupil information is necessary for us to perform our role as a school and to deliver our public task of providing education to our pupils.

- **You have given us your consent:** for example, a photo of you for promotional purposes on our website.

- **We need to protect your vital interests (or someone else's interests).** This relates to life and death situations**.**

- **It is in ours or a third party's legitimate business interests to process the data**. Where this is the case, we will ensure that we have considered whether our legitimate interests are overridden by your rights and freedoms as the pupil or parent.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so. We will then cease this aspect of processing.

Some of the reasons that we use for collecting and using information may overlap and there may be several grounds allowing us to use personal data. There are also other lawful bases that may apply, and this will be made clear wherever possible.

Our lawful basis for processing will be explained at the point at which we collect personal information unless there is a lawful reason not to do so (for example where it is for the prevention or detection of crime).

Special category (sensitive) personal information

We may also collect, store, and use information about you that falls into "special categories" of more sensitive personal data which has extra protection in law and requires us to identify a condition for processing under Article 9 of the GDPR.

Special category data is personal data revealing:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric data for the purpose of uniquely identifying a natural person (for example fingerprints)
- data concerning health; or
- data concerning a natural person's sex life or sexual orientation

The Article 9 grounds which we may rely on to process special category data include:

- Legal obligation
- Substantial public interest including:
    - Statutory and government purposes
    - Equality of opportunity or treatment
    - Preventing and detecting unlawful acts
    - Preventing fraud
    - Public Health
    - Safeguarding
- Support for individuals with a particular disability or medical condition
- Explicit consent, for example to the use of biometric data, e.g. fingerprints.
- To maintain your vital interests

Please refer to our special category of data policy which forms part of our data protection policy for further information.

Criminal convictions

We may process data about criminal convictions or offences. This will usually be where such processing is necessary to carry out our obligations, to exercise our rights, to look after our students and staff or to support the police and other relevant agencies.

We will only use information about criminal convictions or offences where the law allows us to. Usually this will either be either on the basis of our legal obligations in relation to safeguarding, preventing fraud, health and safety or with your consent. We also need to identify the relevant condition for the processing, this will usually be substantial public interest.

Collecting pupil/parent information: Why do we collect and use your information?

The reasons that we collect and use personal information enable us to provide our pupils with an education and to help us run the school. Please refer to **Appendix 2** for examples.

We collect and use information about you in a variety of ways including through the school application and admissions process, from correspondence with you and through assessing pupils' educational progress. The ways in which we collect information about you may also include methods as outlined at **Appendix 3**.

We may also collect information about you from third parties such as information from other schools or other third parties engaging with you outside the school.

Whom we share pupil information with

Information about pupils and parents will not be shared with any third party without consent, unless the law allows us to do so. Where it is legally required or necessary (and it complies with data protection law) personal information may be shared with the relevant local authority to meet our legal obligations to share information such as safeguarding concerns or with the Department for Education (DfE). To find out more about the data collection requirements that are placed upon us by the DfE including the data that we share

with them go to: https://www.gov.uk/education/data-collection-and-censuses-for-schools. We do not use data for profiling, and only for marketing if you have opted in e.g. to our newsletter.

Further examples of with whom we share data are listed at **Appendix 4**. Examples of how we share data with the Department for Education can be seen in **Appendix 5**.

All Together Journey – Wiltshire Council
The School may share with other organisation via Wiltshire Council, the following information:

- Child and family identifying details, including name, date of birth, address, contact details and relevant family relationships
- School and education information, including attendance, engagement, attainment context, SEND needs, reasonable adjustments, support already in place and views of education staff
- Safeguarding, welfare and early help information
- Information about child and family's views etc.
- Relevant health, disability, SEND, social care or family context information
- All Together Journey forms, plans, review records, actions and professional contributions

Youth Support Services

Pupils aged 13+

Once our pupils reach the age of 13, we also pass pupil information to our Local Authority as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- youth support services
- careers advisers

The information shared is limited to the Unique Learner Number (ULN), child's name, address and date of birth and parent email address and telephone number However, where a parent or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the child/pupil once they reach the age 16.

Data is securely transferred to the Local Authority by secure data transfer (Perspective Lite) and is stored electronically and held for as long as is considered necessary by the Local Authority but no longer.

Pupils aged 16+ [For use by educational settings with students aged 16+:]

We will also share certain information about pupils aged 16+ with our Local Authority as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- post-16 education and training providers
- youth support services

- careers advisers

A child / pupil once they reach the age of 16 can object to only their name, address and date of birth is passed to their local authority or provider of youth support services by informing us.

For more information about services for young people, please visit our local authority website.

Data is securely transferred to the Local Authority by secure data transfer (Perspective Lite) and is stored electronically and held for as long as is considered necessary by the Local Authority but no longer.

Storing pupil and parent data

Personal data is stored in line with our data protection policy in a range of different places including CPOMS, within pupils' files, the school MIS and our IT systems including the school's email system.

The information that we create and maintain is kept secure. Once a pupil's education with us has ended, we may retain such information beyond their attendance at the school as deemed necessary and in line with our retention policies. A copy of the Retention Schedule can be obtained by contacting the School Office by telephoning 01249 650693 or emailing admin@hardenhuish.wilts.sch.uk.

Transferring data internationally

Where we transfer personal data to a country or territory outside the UK, we will do so in accordance with data protection law and ensure that we have sufficient safeguards in place.

Requesting access to your personal data

Individuals have the right to request access to information about them that we hold. This is known as making a 'Subject Access Request' (SAR). If you make a subject access request, and if we hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form within a month, unless an extension is necessary on the ground of the complexity of the request

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances. If you would like to make a request, please contact the school on 01249 650693 or email admin@hardenhuish.wilts.sch.uk

Children have the same rights as adults over their personal data and the school will assess each request on its own merits. Pupils can find out what personal information we hold about them and how we use it by making a subject access request as long we judge that they can properly understand their rights and what this means.

Those with parental responsibility can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (a benchmark may be under the age of 12 however, this will be judged by the school on a case by case basis), or where the child has provided consent and it is considered to be in the best interests of the child. Parents also have the right to make a subject access request with respect to the personal data the school holds about themselves. If you would like to make a request please contact Mrs Kerry Irwin, Leadership Team PA @ admin@hardenhuish.wilts.sch.uk

There is no equivalent legal right to access a child's educational record. It will be up to the school to decide

whether to grant such access, and it is likely to depend on the contractual relationship between the parent and the school.

Other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- To request to have personal data rectified if you believe that it is inaccurate or incomplete.
- To request the deletion or removal of personal data where there is no compelling reason for its continued processing.
- To restrict our processing of personal data (i.e. permitting its storage but no further processing) under certain circumstances.
- To object to processing if we are processing your information as part of our public tasks, or on the basis of our legitimate business interests, in which case we will consider your objection, and balance this against our need to process the information.
- To object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics.
- To withdraw your consent to processing
- To have personal information, which you have provided, transmitted electronically to another organisation in certain circumstances.
- Not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect - unless you have agreed or in other limited circumstances.
- A right to seek redress, either through the ICO, or through the courts

Contact and Complaints

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please either contact the school office, or Business / Administration Manager, 01249 650693/admin@hardenhuish.wilts.sch.uk:

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please contact our data protection lead on admin@hardenhuish.wilts.sch.uk or our Data Protection Officer One West,

Email: i-west@bathnes.gov.uk 01225 395959

You can also complain to the ICO if you are unhappy with how we have used your data, but they would generally expect you to have raised the issue with us first.

The ICO's address:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113 Ma

ICO website: https://www.ico.org.uk

Updates to our Privacy Notice

We may need to update this Privacy notice periodically. This version was last updated October 2025.

Appendix 1: Non- exhaustive list of examples of the types of personal data which we collect about pupils and parents

- 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 conditions (such as doctor information, child health, dental health, allergies, medication and dietary requirements).
- Attendance record (such as sessions attended, number of absences, absence reasons and any previous schools attended).
- Test results, assessment and attainment (such as GCSE results, post 16 courses enrolled for and any relevant results, destinations information such as Higher Education institutions.
- Behavioural information (such as exclusions and any relevant alternative provision put in place).
- Photographs and CCTV
- We may use online platforms to deliver lessons remotely, if we intend to record the lesson we will let you know
- Platforms to support learning, and for Safeguarding and Wellbeing purposes.
- Careers sites to support careers education and Work Experience.

This list is not exhaustive. To access further details of the categories of personal information we process, please contact the school office (admin@hardenhuish.wilts.sch.uk)

Appendix 2: Examples of whom we may share your data with where the law permits (non – exhaustive list)

- The Local Authority (Wiltshire Council)
- Schools that students attend after leaving Hardenhuish School
- The Department for Education (DfE).
- The National Health Service to support student safety and vaccination programmes.
- The pupil's family and representatives.
- Educators and examining bodies.
- The schools' inspector
- Suppliers and service providers so that they can provide a contracted service such as careers provision.
- Central and local government.
- Auditors.
- Survey and research organisations (i.e. Mighty Girls and Bath Uni)
- Security organisations.
- Health and social welfare organisations.
- Professional advisers and consultants.
- Counsellors/Educational Psychologists as and when appropriate.
- Charities and voluntary organisations.
- Police forces, courts, tribunals.
- Professional bodies.
- Our data protection officer on occasion, e.g. to support a subject access request
- Occasionally with school governors

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.

Appendix 3: How we share information with the Department for Education (DfE) and the National Pupil Database (NPD)

Hardenhuish School is required to provide information about pupils to the DfE as part of statutory data collections such as the school census.

Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the DfE and provides evidence on school performance to inform research.

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

The DfE 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.

Sharing by the DfE:

The law allows the 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.

We lawfully share pupil data with the DfE through data collections which is used to

- underpin school funding, which is calculated based upon the numbers of children and their characteristics in each school.

- inform 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).

- support 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

For more information about the DfE's NPD data sharing process, please visit: https://www.gov.uk/data-protection-how-we-collect-and-share-research-dataTo find out more about the data collection requirements placed on us by the DfE via the school census please visit: https://www.gov.uk/education/data-collection-and-censuses-for-schools

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

If you want to see the personal data held about you by the DfE, you can make a 'subject access request' to the DfE. Further information on how to do this can be found within the DfE'S personal information charter that is published here: https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter

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

Third Party Processor	Personal data captured	Purpose	Country the data is processed in	Who the information may be shared with and why
Microsoft	All types of data	Full productivity suite	Republic of Ireland	The pupil's family, as evidence of academic progress. The local authority if any expressed opinions were to be considered a safeguarding concern.
Pearson Active Hub	Pupil first and last name, date of birth, email address, year group	To provide a tool to assist with MFL learning.	EU but possible for data to move to Republic of Ireland, USA, Singapore, India, Australia, Philippines	
Applicaa	Pupil full name, date of birth, gender, religion, parent name, address and contact information, emergency contacts, medical information, ethnicity, religion, country of birth, dietary information, previous school.	Data collection and enrolment platform for new Y7 cohorts.	EEA	
Arbor	As above and also behaviour, assessment, exams, timetabling information, consents.	As above	AWS London	
Barracuda	Data back up system		UK	
Carousel Learning	Pupil first and last names	To support the education of pupils in developing good study habits and learning content required for exams.	AWS Ireland	
CCTV	Images / footage	Security system	On site	

The Careers and Enterprise Company - Compass+	Pupil name and date of birth, tutor and class groups, ethnicity, first language and entitlement to SEN provision.	Planning and monitoring careers education.	EEA	
CPOMS Systems	CPOMS links to the school's MIS system and collects data from the following records in addition to name and date of birth: Behaviour SEN Safeguarding	For safeguarding of pupils	UK	The local authority where there may be a safeguarding concern.
Desmos Studio PBC	Math lessons	Educational benefit	USA	
Discovery Education Europe - Doodle Learning	Supporting pupils with maths studies	Educational benefit	EEA	
Duolingo	Language learning app	Platform to support development of language skills.	USA and EU	
The Duke of Edinburgh's Award - eDofE	To create online accounts and register pupils for the Duke of Edinburgh scheme	Educational benefit	UK	
Educake	Pupil name, age, date of birth and/or gender, school year and classes, email address.	Revision tool / homework.	UK	
Autodesk - Fusion	To learn using industry leading tools.	Educational benefit	USA	

SignIn	Pupil name, year group and tutor	Pupils signing in/out system	UK cloud based	
IRIS	Student names and bank details	Finance software	UK server cloud based	
Oxford University Press - Kerboodle	Pupil names	Platform to support development of language skills.	UK/EEA and may be processed in counties outside of this but only where appropriate and suitable safeguards and technical measures are in place.	
Marking Solutions - MarkMate	Pupil names	To support marking of pupils'work.	UK	
Massolit Online Education	Student names and school email address	Helps to support, consolidate and deepen student knowledge of A Level content.	EEA	
Memrise	Pupil school email address	Language learning app which supports students to learn vocabulary.	EEA	
NHS / HCRG Care Group	Pupil first and last names, date of birth and postcode. Parent email address	Data	EEA	UK GDPR Article 6(1)(e) - processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority. UK GDPR Article 9(2)(h) - processing is necessary for medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems /

				Article 9(2)(i) - processing is necessary for reasons of public interest in the area of public health. • Underpinned by - the Health and Social Care Act 2012, Section 11 paragraph 2A and the NHS Act 2006 section 7a. and • UK Government Guidance: Adolescent vaccination programme: briefing for secondary schools 2025 to 2026
Renato Software – Senso	Network and classroom behaviour management, monitoring of computer use and website visits and diagnostic data	Monitoring software	UK	
Teachercentric Satchell:One	MIS ID Name UPN Gender Year Group Class Groups Siblings	Platform to support home learning	EEA	

	Parents (information to include: name, address, telephone number and email address). Timetable Information SEN / Inclusion Tags (Pupil Premium, FSM, EAL, Primary Language etc.			
Soundtrap	Pupil first and last names and email addresses	Educational benefit (music)	UK/USA	
Sparx Learning	Name, gender, year group, class, date of birth and unique pupil number (UPN) or other identifying code (where UPN is unavailable), and the parent contact details	Platform to support homework	EEA	
Wonde	Pupil full name, date of birth, gender, religion, parent name, address and contact information, emergency contacts, medical information, ethnicity, religion, country of birth, dietary information, previous school, attendance and assessment information.	Secure means of sharing data stored in the School's MIS with third party applications.	EEA	DfE
Civica	Pupil first and last name, FSM and Medical information	Cashless catering system	UK	
Salamander AD	Sync tool	Synchronises onsite and Arbor data with Microsoft 365.	UK	

Cloud Design Box	Sync tool	Syncs up classes in SharePoint	UK/EEA	
Adobe Creative Cloud	Pupil names and images	Provides access to Adobe software	UK / EEA – Other countries where permitted to do so by law.	
University of Bath / Wessex Inspiration Network	Pupil First and Last Name Postcode Date of birth Ethnicity Young Carers Gypsy, Roma, Traveller Learners Refugee Learners Service Children in Education	**WIN** (Wessex Inspiration Network) is one of 29 regional partnerships within the Uni Connect Programme aiming to increase social mobility by raising awareness of Higher Education (HE) opportunities and progression pathways for young people.	UK	
TES Parent Meeting	Parent name & email address Pupil name and date of birth	Parent meeting booking system	EEA/Australia	
Unifrog	Pupil name, contact details, date of birth, postcode, academic performance and aspirations and in some cases SEN data	C**areers guidance platform**	EEA	
Snoozify Project	Pupil names, age, gender, sleep and media diary, SEN, FSM EAL (optional)	Sleep Project	UK	