



POLICY	DATA PROTECTION PRIVACY NOTICE FOR PUPILS AND STUDENTS
STATUS/DATE OF THIS VERSION	July 2026
APPROVED BY	Board of Trustees
RATIFIED BY	Board of Trustees – July 2026
REVIEW	July 2027

This policy is operated by all the schools in Unity Education Trust (as listed below). **There may be sections that are specific to one school and these will be added by the school either as an annex or in place of yellow highlighted sections below.**

Any queries about the policy should be directed, in the first instance, to the Headteacher/Head of School:

- **Beeston Primary**
- **Garvestone Primary**
- **Grove House Infant**
- **Kings Park Infant**
- **Northgate High School and Dereham Sixth Form College**
- **The Pinetree School**
- **Churchill Park**
- **Greyfriars Primary**
- **Highgate Infant School**
- **Kings Oak Infant School**
- **Wimbotsham and Stow Primary**
- **Magdalen Primary**
- **St Germans Primary**
- **Great Dunham Primary**
- **UET Compass Belton Academy**
- **UET Pathfinder Douglas Bader Academy**

Purpose of this document

A new law is being made that keeps your information safe – things like your address, date of birth and phone number. Your school is a member of Unity Education Trust (UET). The Trust, your school and other people collect and use information for all kinds of reasons, and the new law tells them exactly what they are allowed to do with yours.

We collect some information about our pupils, like you. It's our job to tell you how we will collect the information, how we will record it and how we will use it.

In this notice, you will see different names or terms used that you may not be familiar with, such as:

Data controller: This person (or group of people, like the Trust) is in charge of the information we collect.

Data processor: This person processes information for the data controller.

Data protection officer (DPO): This person makes sure we do everything the law says.

Personal data: This means any information that can be used to identify someone, such as your address and date of birth.

Who looks after your information?

UET is the data controller of the personal information you give us – we look at how and why your information are collected and used.

Sometimes UET has to give your information to other people, such as the government, but it will only give away your information when you say it's ok or when the law says that they have to. When your data is given to someone else, they must look after it and keep it safe.

The categories of pupil information that we collect, hold and share include:

- Personal information (such as name, unique pupil number and address);
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility);
- Attendance information (such as sessions attended, number of absences and absence reasons);
- Assessment information, attainment and education records (such as key stage assessments, examinations, courses undertaken and any relevant results);
- Special Educational Needs information (including the needs and ranking);

- Behavioural information (such as, achievements, exclusions, internal exclusions and detentions);
- Health and medical information (such as doctors' information, child health, dental health, allergies, medication and dietary requirements);
- Biometrics (such as, fingerprints)
- Safeguarding and Child Protection reports, disclosures and court orders;
- Photographs and video clips;
- Post 16 destinations and learning information; and
- We record CCTV for the safety and security of everyone in the school.

Why we collect and use this information

The Trust will only collect your information when we need it to help us do our job or to follow the law. When we've collected it, here's how we use it:

- To support pupil learning
- To monitor and report on pupil progress
- To provide appropriate pastoral care
- To assess the quality of our service
- To administer admissions
- To carry out research
- To promote the Trust/school and events organised by them
- To contact you when necessary for school purposes using contact details that you have provided
- To comply with the law regarding data sharing
- To facilitate the use of our cashless catering system

Our lawful basis for using this data

The Trust will only collect and use your information when the law allows us to. We need to establish a lawful basis to do this. Our lawful basis for processing your personal information can be seen below:

- We collect and use pupil information under a task performed in the public interest where it relates to a child's educational progression;
- Some photographs and videos are used only after gaining explicit consent;
- Where medical data is being processed, this is processed under a legal obligation (Children and Families Act 2014 which includes a duty on schools to support children with medical conditions);
- Safeguarding data is processed under the legal obligation of The Education Act 2002. Sections 21 and 175, which detail how governing bodies of schools

must promote the wellbeing of pupils and take a view to the safeguarding of children at the school;

- We collect and process pupil information to perform our official function (public task); and
- Where it is carried out as a task in the public interest such as equal opportunities monitoring, for child protection purposes or where otherwise authorised by law, such as Departmental Censuses as required in the Education Act 1996.

Where you have provided us with consent to use your personal information, you may take back this consent at any time. We will make this clear when requesting your consent and explain how you withdraw your consent if you want to.

Educational technology and AI-assisted systems

The Trust uses digital learning platforms, safeguarding systems and administrative technologies, including some systems that may use artificial intelligence (AI) features.

These tools may assist with:

- Accessibility and translation;
- Safeguarding monitoring;
- Online safety monitoring;
- Learning support and feedback;
- Administration and communication; and
- Cyber-security protection

These tools often work alongside our filtering, monitoring, and security systems to help safeguard pupils and meet our statutory safeguarding duties. Any significant decisions affecting pupils will involve appropriate human oversight.

We require technology providers to comply with data protection and safeguarding obligations.

Our basis for using special category data

For special category data (sensitive personal information) the Trust will only collect and use it when we have both a lawful basis and one of the following conditions for processing as set out in data protection law:

- Where we have obtained your explicit consent to use your information in a certain way;
- When we need to use your information under employment, social security, or social protection law;

- When we need to protect an individual's vital interest (i.e protect your life or someone else's life) in situations where you are physically or legally incapable of giving consent;
- Where the information has already been made obviously public by you;
- When we need to use it to make or defend legal claims;
- When we need to use it for reasons of substantial public interest as defined in legislation;
- Where we need to use it for health and social care purposes and it's used by, or under the direction of, a professional obliged to confidentiality under law;
- Where we need to use it for public health reasons and it's used by, or under the direction of, a professional bound by confidentiality under law; and
- When we need to use it for archiving purposes, scientific or historical research purposes, and/or for statistical purposes, and the use is in the public interest.

For criminal offence data, we will only collect and use this type of personal information when we have both a lawful basis as set out above and a condition for processing as set out in data protection law. Conditions include:

- we have obtained your consent to use it in a specific way;
- we need to protect an individual's vital interests (i.e protect your life or someone else's life), in situations where you are physically or legally incapable of giving consent;
- the data concerned has already obviously been made public by you;
- we need to use it as part of legal proceedings, to obtain legal advice or to make or defend against legal claims; and
- we need to use it for reasons of substantial public interest as defined in legislation.

Legitimate interests

In limited circumstances, we may process certain technical and usage information where necessary for legitimate interests relating to:

- maintaining the safety and security of school systems and devices;
- preventing unauthorised access or misuse;
- supporting online safety and safeguarding measures; and
- protecting school networks and services.

Such processing will always be carried out in a lawful, fair and proportionate manner with appropriate safeguards.

Collecting and storing pupil information

Whilst most of the pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data

Protection Regulation, we will inform you whether you have to give us this information or if you have a choice in this.

We collect pupil information in multiple ways:

- Transfer of electronic and physical data from another setting (such as a previous school);
- Information given to us by the pupils in the school (such as in work or behaviour reports);
- Information given to us by a parent or carer (such as information required when a child starts school); and
- Information provided to us from external agencies and organisations (such as the Local Authority).

Where we collect and hold pupil information, we endeavour to ensure all appropriate technical and organisational measures are in place to keep the data secure. Data will be kept for the duration as documented in our Retention Schedule, which can be requested by contacting the school office.

Whom we share pupil information with

The Trust will routinely share pupil information with

- schools that the pupils attend after leaving us;
- our local authority;
- examinations bodies;
- admissions authorities;
- youth support services (pupils aged 13+);
- The Department for Education (DfE);
- suppliers that we have contracted with to provide educational services and those related to the operations of the school (see Appendix A);
- examination boards;
- the police, when investigating or preventing crime;
- courts and tribunals, when ordered to do so under the law;
- the pupil's family and authorised representatives;
- Health and welfare organisations;
- Statutory research bodies;
- regulators, such as Ofsted or the Information Commissioner's Office, when required to do so; and
- Auditors and other professional bodies.

Monitoring of online activity

To help keep students safe online and meet our safeguarding obligations, the Trust uses filtering and monitoring systems provided by Securly.

We monitor and log activity carried out using Trust-managed devices, Trust accounts, and Trust internet services. This includes:

- Internet browsing and online activity.
- Searches performed online.
- Access to websites and online services.
- Student use of AI tools and AI chatbots through Securly AI Chat.
- Email activity, where automated monitoring identifies content that may indicate a safeguarding, welfare, security, or policy concern.

Monitoring systems do not involve staff reading all student emails or reviewing all activity. Instead, automated systems analyse activity and generate alerts where predefined safeguarding or risk criteria are met.

Why we monitor activity

We monitor online activity to:

- Safeguard and promote the welfare of children and young people.
- Identify potential risks relating to online safety, self-harm, bullying, exploitation, radicalisation, or other safeguarding concerns.
- Protect students, staff, and Trust systems from inappropriate, harmful, or illegal online content.
- Support compliance with statutory safeguarding duties and Department for Education guidance.
- Investigate potential breaches of Trust policies and acceptable use requirements.

Who can access monitoring information

Access to monitoring information is strictly limited to authorised personnel.

Alerts, reports, and monitoring records may be accessed by:

- The Designated Safeguarding Lead (DSL) and authorised safeguarding staff for the student's school.
- The Trust ICT Manager, where access is required to support safeguarding, security, technical investigations, or Trust-wide oversight.

School-based safeguarding staff can only access information relating to their own school.

Where required by law or safeguarding obligations, information may also be shared with external agencies such as children's social care, the police, or other relevant authorities.

Retention of monitoring information

Different monitoring records are retained for different periods:

- Securly Filter activity logs are retained for **1 year**.
- Securly Aware monitoring alerts and associated activity records are retained for **1 year**.
- Securly AI Chat records are retained only for as long as necessary to provide educational oversight and safeguarding support.
- Where an AI chat interaction generates a safeguarding alert through Securly Aware, the relevant information may be retained for **up to 1 year** in line with safeguarding monitoring records.

Why we share pupil information

We won't share your information with anyone else without your permission, unless the law says we can or should.

Sometimes we have to share your information. We normally have to share it with the people in charge of all schools, the Department for Education (DfE).

Under Regulation 4 and 5 of the Education (Information about individual pupils) (England) Regulations 2013.

DfE is statutory for school funding and for educational attainment policy and monitoring, and other government agencies and local authorities as required.

Norfolk County Council teams working to improve outcomes for children and young people.

Commissioned providers of local authority services

Schools or colleges you attend after leaving us

Local forums with schools and Norfolk County Council representatives which support in-year fair access processed and support managed moves between schools

Local multi-agency forums which provide SEND advice, support and guidance

Partner organisations signed up to the Information Sharing Agreement – which may include the Police, YOT, School Nurses, Doctors and Mental health workers, and Norfolk Community Health Foundation Trust

Schools in our local collaboration to enable moderation of pupil assessment outcomes, to support collaborative working, through joint analysis, and ensure children continue to receive appropriate education provision

NCC shares information with external moderators of end of key stage assessments to meet statutory requirements from the Standards and Testing Agency (STA)

Third party providers and information services where consent has been given. We check providers are not transferring data outside of the EU.

Contracted providers of services such as school photographers and catering providers where consent has been given.

With law enforcement or other authorities if required by applicable law.

Pupil information to Norfolk County Council to fulfil their responsibilities to education or training of 13-19 year olds under Section 507B of the Education Act 1996 including intended destinations of pupils moving from Year 11 into Year 12 and September Guarantee course offers for pupils in Year 11 moving into Year 12.

Norfolk County Council has a legal responsibility to track all young people up to the age of 19 (and young adults with learning difficulties or disabilities up to the age of 25)

to assist the planning of education and training for young people and the support services they require. We will be informed of your current activity once you have left the school in relation to education, training, employment with training you may be undertaking, and whether you are NEET (not in education, employment or training) Some of this information is shared with the DfE to assist with National Planning. At a local level, this information enables Norfolk County Council too provided and arrange post-16 education and trading, youth support services and careers advice and guidance.

They store some of their information in the National Pupil Database, and then share some of it with people looking to help schools and pupils like you. But don't worry, the database is very safe and your information won't get lost or given to anyone who shouldn't have it.

Once you reach the age of 13, we have to pass on certain information local authority/youth support services, who are responsible for the education or training of 13-to-19-year-olds.

We might share some information with people who provide education and training for people over 16, like colleges. We may pass on information that helps them to make sure they provide the right kinds of education, such as your name, date of birth, where you're from and things like that.

Your parents can ask us to only share your name, address and date of birth, and nothing else, by sending an email or letter to your school or college office. When you're 16, it's up to you to decide what information you want to share.

We have to share some information with careers services once you reach 16.

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>.

Youth support services

Pupils aged 13+:

Once our pupils reach the age of 13, we also pass pupil information to our local authority and/or provider of youth support services 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; and
- careers advisers.

A parent or guardian can request that **only** their child's name, address and date of birth be passed to their local authority or provider of youth support services by informing us. This right is transferred to the child/pupil once he/she reaches the age of 16.

Data is securely transferred to the youth support service and kept for the duration as documented in our Retention Schedule.

Pupils aged 16+:

We will also share certain information about pupils aged 16+ with our local authority and/or provider of youth support services 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; and
- careers advisers.

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

Data is securely transferred to the youth support service and kept for the duration as documented in our Retention Schedule.

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 Department for Education (DfE) either directly or via our local authority for those data collections, under:

We share relevant information with the DfE as is our statutory responsibility and duty outlined by the Education & Skills Act 2008, section 72.

Examples for school census:

For use by academies: regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

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

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

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)

Much of the data about pupils in England is held in 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. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department for Education (DfE).

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 for Education (DfE)

The law allows the Department for Education (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 (DfE) 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 the Department for Education (DfE) to request access to individual-level information relevant to detecting that crime.

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>

How to find out what personal information the Department for Education (DfE) holds about you

Under the terms of the Data Protection Act 2018, 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'. Further information on how to do this can be found within the Department for Education's (DfE) personal information charter, which is published at the address below:

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

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>

Your rights

You and your parents have the right to:

- Be told how we use your information.
- Ask to see the information we hold.
- Ask us to change information you think is wrong.
- Ask us to remove information when it's not needed anymore.
- Ask us to only use your information in certain ways.
- Tell us you don't want your information to be processed.

If the information we are collecting is information that you can choose not to give, you can tell us to stop collecting it at any time.

If you're worried about how we get and use your information, you can speak to your teacher. If they cannot answer your question, they can give you the name of someone else who works for UET who may be able to help. If you want to speak to somebody not at the school, you can call the people who look after information, called the Information Commissioner's Office (ICO), on 0303 123 1113 or using their [live chat](#).

Concerns about how your personal data is handled

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance using the contact information on the first page of this document.

If you are dissatisfied, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Would you like to know more?

If you or your parents would like to find out more information about how we and/or the DfE collect, use and store your personal information, please visit our website www.unityeducationtrust.uk