



Four Hills
Education Trust

Where Every Step is Shaped with **CARE**

Privacy Notice: How We Use Pupil Information

Version: 2.0

Effective from: 1 September 2026

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Schools covered by this notice

This privacy notice applies to pupils attending:

- Albrighton Primary School and Nursery
- Meadows Primary School and Nursery
- Millbrook Primary School and Nursery
- Woodlands Primary School and Nursery
- William Reynolds Primary School and Nursery

1. Who we are

Four Hills Education Trust is the organisation responsible for deciding how and why pupil personal information is collected, used, stored and shared.

For data protection purposes, Four Hills Education Trust is the **Data Controller** for the personal information processed by the Trust and its schools.

Data Controller:

Four Hills Education Trust
Grainger Drive
Leegomery
Telford
TF1 6UJ

Four Hills Education Trust

Address: % Millbrook Primary School & Nursery, Grainger Drive,
Leegomery, Telford, Shropshire, United Kingdom, TF1 6UJ

Telephone: 01952 387640

Email: Enquiries@fourhillseducationtrust.org.uk

Website: www.fourhillseducationtrust.org.uk

Telephone: 01952 387640

Email: accounts@fourhillseducationtrust.org.uk

This notice should be read alongside the Trust's Data Protection Policy, Information Security Policy, Information Retention Schedule and other relevant policies and notices.

2. Who this privacy notice is for

This privacy notice explains how we collect, use, store and share information about pupils.

Children have the same data protection rights over their personal information as adults. Where a pupil has sufficient understanding and maturity, they may exercise their data protection rights themselves. Whether a pupil has sufficient understanding will be assessed individually, taking account of their age, maturity, understanding and best interests.

Where a pupil is not able to understand or exercise their rights, a person with parental responsibility may normally exercise those rights on their behalf, provided this is in the child's best interests.

The Trust will make age-appropriate privacy information available to pupils so that they can understand how their information is used and how they can exercise their rights.

3. Data protection legislation

We process personal information in accordance with:

- the UK General Data Protection Regulation, referred to as the UK GDPR;
- the Data Protection Act 2018;
- the Data (Use and Access) Act 2025;
- the Education Act 1996;
- the Education Act 2002;
- the Education and Skills Act 2008;
- the Children Act 1989;
- the Children Act 2004;
- the Children and Families Act 2014;
- the Equality Act 2010;
- the School Standards and Framework Act 1998;
- the School Admissions Regulations;
- the School Attendance Regulations;
- relevant safeguarding legislation and statutory guidance;
- other legislation applying to academies, schools, children and education.

The Data (Use and Access) Act 2025 amends, but does not replace, the UK GDPR and Data Protection Act 2018. [\[ico.org.uk\]](https://ico.org.uk)

4. The personal information we process

The categories of pupil information we may collect, use, store or share include:

Personal identifiers and contact information

- name;
- date of birth;
- address;
- telephone and emergency contact details;
- unique pupil number;
- pupil admission number;
- previous names;
- photographs and images;
- parent and carer names and contact details.

Personal characteristics

- sex;
- ethnicity;
- first language;
- nationality and country of birth, where collected;
- eligibility for free school meals;
- eligibility for other forms of pupil support;
- service child status;
- looked-after or previously looked-after status.

Attendance and admissions information

- admission information;
- previous schools attended;
- school attendance;
- absences and reasons for absence;
- lateness;
- school transfer information;
- attendance at breakfast clubs, wraparound care or other school provision, where applicable.

Assessment, attainment and learning information

- assessment results;
- progress and attainment information;
- teacher assessments;
- phonics and statutory assessment results;
- curriculum and learning records;

- educational reports;
- homework and learning platform information.

Special educational needs and disabilities information

- identified special educational needs and disabilities;
- education, health and care plans;
- SEN support arrangements;
- professional assessments and reports;
- interventions, provision and outcomes;
- access arrangements.

Medical, health and dietary information

- health conditions;
- allergies and intolerances;
- medication;
- dietary requirements;
- disability information;
- medical care plans;
- doctors' and healthcare professional information;
- accident and first-aid records;
- information necessary to protect a pupil's health and wellbeing.

Safeguarding and welfare information

- safeguarding concerns and records;
- court orders;
- child protection plans;
- early help information;
- social care involvement;
- professional involvement;
- family circumstances relevant to safeguarding or welfare;
- information relating to allegations, incidents or concerns.

Behavioural and pastoral information

- behavioural incidents;
- rewards and sanctions;
- suspensions and permanent exclusions;
- alternative provision arrangements;
- pastoral support;
- wellbeing information;
- bullying or discriminatory incident records.

Financial and administrative information

- school meal payments;
- free school meal eligibility;
- trip and activity payments;
- funding eligibility;
- information supporting applications for financial assistance;
- debt and payment information connected with school services.

Technology and security information

- usernames and account identifiers;
- school network and system usage;
- online learning activity;
- device information;
- access and security logs;
- photographs, video or audio recordings;
- CCTV images, where CCTV is in use.

This list is not exhaustive. The Trust maintains records describing its personal data processing activities.

5. Why we collect and use pupil information

We collect and use pupil information to:

- support teaching, learning and pupil development;
- monitor and report on pupil progress and attainment;
- provide appropriate pastoral care;
- identify and meet special educational needs and disabilities;
- protect pupils' health, safety and wellbeing;
- safeguard children and fulfil our child protection responsibilities;
- record and manage attendance and absence;
- administer admissions and school transfers;
- manage behaviour, suspensions, exclusions and alternative provision;
- assess and improve the quality of our educational services;
- provide school meals, trips, clubs and other school services;
- communicate with parents, carers and professionals;
- manage school systems, accounts and learning platforms;
- administer funding, including pupil premium and free school meals;
- comply with statutory data collections, including the School Census and Early Years Census;
- meet our legal, regulatory, inspection and public accountability duties;
- manage complaints, concerns and legal claims;
- prevent and detect crime, fraud or misuse of school systems;

- support research and statistical analysis where permitted by law;
- respond to emergencies;
- inform and evaluate education policy.

6. Our lawful bases for using pupil information

We must have a lawful basis under Article 6 of the UK GDPR whenever we process personal information.

The lawful bases we rely on are:

Legal obligation: Article 6(1)(c)

Processing is necessary for the Trust to comply with a legal obligation. This includes statutory education returns, attendance duties, safeguarding responsibilities, special educational needs duties and other legal requirements applying to schools and academy trusts.

Public task: 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. This includes providing education, supporting pupils, monitoring progress, managing attendance and operating an academy school.

Vital interests: Article 6(1)(d)

In exceptional circumstances, processing may be necessary to protect the life or physical safety of a pupil or another person, such as during a medical emergency.

Contract: Article 6(1)(b)

In limited circumstances, processing may be necessary to enter into or perform a contract, for example where optional services are purchased directly by a parent or carer.

Consent: Article 6(1)(a)

We may ask for consent where another lawful basis does not apply, for example for certain optional uses of photographs or participation in optional activities.

Where we rely on consent:

- consent will be specific, informed and freely given;
- consent can be withdrawn at any time;
- withdrawing consent will not affect processing that took place lawfully before consent was withdrawn;
- refusing or withdrawing consent will not normally affect core educational provision.

We do not generally rely on consent where processing is necessary to meet our legal obligations or perform our public education functions.

7. Special category personal information

Some information is more sensitive and receives additional legal protection. This is known as special category personal data and includes information about:

- racial or ethnic origin;
- religious or philosophical beliefs;
- physical or mental health;
- genetic information;
- biometric data used for identification;
- information about a person's sexual life or sexual orientation;
- trade union membership;
- political opinions.

Where we process special category information, we rely on an Article 6 lawful basis and an additional condition under Article 9 of the UK GDPR.

The conditions most likely to apply are:

- **Article 9(2)(b):** employment, social security and social protection law;
- **Article 9(2)(c):** protecting vital interests where the person is incapable of giving consent;
- **Article 9(2)(g):** reasons of substantial public interest;
- **Article 9(2)(h):** health or social care purposes;
- **Article 9(2)(j):** archiving, research or statistical purposes, with appropriate safeguards;
- **Article 9(2)(a):** explicit consent, where appropriate.

Where Article 9(2)(g) applies, we will identify an appropriate condition under Schedule 1 of the Data Protection Act 2018. These may include:

- safeguarding children and individuals at risk;
- equality of opportunity or treatment;
- preventing or detecting unlawful acts;
- supporting statutory and government functions;
- providing confidential counselling, advice or support;
- insurance and occupational health purposes, where applicable.

Where legislation requires it, we will maintain an Appropriate Policy Document explaining how protected information is handled and retained.

8. Criminal offence information

We may process information relating to alleged or proven criminal activity where necessary for safeguarding, preventing or detecting crime, managing serious incidents or complying with legal requirements.

We will only process criminal offence information where this is permitted under Article 10 of the UK GDPR and the Data Protection Act 2018.

9. How we collect pupil information

We collect pupil information from a range of sources, including:

- parents and carers;
- pupils;
- application and admission forms;
- previous schools and education settings;
- the Common Transfer File and secure school-to-school transfer systems;
- teachers and other school staff;
- the Department for Education;
- local authorities;
- social care services;
- the NHS, school nurses and other healthcare professionals;
- educational psychologists and specialist services;
- safeguarding partners;
- police and other law enforcement bodies;
- courts and tribunals;
- school systems, learning platforms and approved service providers;
- publicly available sources where lawful and appropriate.

Where information is obtained from another source, we will normally provide the appropriate privacy information unless an exemption applies.

10. Is providing pupil information compulsory?

Most pupil information is required so that we can comply with education, attendance, safeguarding, funding and other statutory duties. Pupil information is also essential for the safe and effective operation of the school.

Some information is provided voluntarily. We will tell pupils and parents or carers at the point of collection whether:

- the information must be provided;
- providing it is optional;
- consent is being requested; and
- what may happen if the information is not provided.

Where mandatory information is not provided, we may be unable to:

- fulfil our statutory duties;
- provide appropriate education or support;
- protect a pupil's health or safety;
- administer funding or services;
- make appropriate safeguarding, medical or pastoral arrangements.

The DfE's model wording confirms that schools should explain when information is mandatory or voluntary and should identify relevant Article 6 and Article 9 conditions for their processing.

11. How we store and protect pupil information

Pupil information is held securely in electronic and paper formats.

We use appropriate technical and organisational measures to protect personal information against:

- unauthorised or unlawful access;
- accidental loss;
- alteration;
- inappropriate disclosure;
- destruction;
- damage.

These measures include, where appropriate:

- access controls and user permissions;
- password protection and multi-factor authentication;
- encryption and secure transfer arrangements;
- secure storage and disposal;
- staff training;
- confidentiality requirements;
- data processing agreements;
- system monitoring and backups;
- incident and data breach procedures.

Access is limited to staff, contractors and other authorised persons who need the information to perform their duties.

12. How long we keep pupil information

We keep personal information only for as long as it is needed for the purpose for which it was collected, or for as long as we are legally required to retain it.

Different records have different retention periods. These are set out in the Trust's Information Retention Schedule, which reflects:

- statutory education requirements;
- safeguarding requirements;
- limitation periods for legal claims;
- Department for Education requirements;
- recognised records-management guidance.

Examples include:

- the main pupil educational record will ordinarily be transferred securely to the pupil's next school;
- safeguarding records will be retained and transferred in accordance with safeguarding requirements;
- accident, medical, attendance, SEN and complaints records will be retained for the periods specified in the Trust's Information Retention Schedule.

At the end of the applicable retention period, information will be securely deleted, anonymised or destroyed, unless there is a lawful reason to retain it for longer.

A copy of the Information Retention Schedule can be requested from the Trust or its Data Protection Officer.

DfE guidance requires privacy notices to explain how long information will be retained, or direct individuals to the applicable retention arrangements.

13. Who we share pupil information with

Where necessary and lawful, we may share pupil information with:

- the Department for Education;
- the Education and Skills Funding Agency;
- local authorities;
- schools or education settings attended after leaving us;
- previous schools or education settings;
- Ofsted;
- safeguarding partners;
- social care and early help services;
- the NHS, school nurses and healthcare professionals;
- educational psychologists and specialist support services;
- SEND services;
- children's services;
- youth support and careers services, where relevant;
- police and other law enforcement agencies;
- courts, tribunals and legal advisers;

- examination, assessment and moderation bodies;
- external auditors and professional advisers;
- insurers and the Risk Protection Arrangement;
- catering, school meal and payment providers;
- transport providers;
- approved educational technology and online learning providers;
- management information system providers;
- safeguarding and communication system providers;
- contractors and suppliers processing information on our behalf;
- regulatory bodies and government departments;
- research and statistical organisations where permitted by law;
- emergency services;
- other persons or organisations where disclosure is required or permitted by law.

We do not share pupil information routinely without a lawful reason. We will only share information that is relevant, adequate and necessary for the purpose.

When sharing children's information, we take account of the child's best interests, the necessity of the sharing and the risks to the child's rights and freedoms.

14. Organisations processing information on our behalf

We use third-party suppliers to provide systems and services, including:

- management information systems;
- safeguarding systems;
- communication platforms;
- online learning systems;
- assessment systems;
- payment and catering systems;
- cloud storage;
- IT support;
- educational applications.

Where a supplier processes personal information on our behalf, it acts as a Data Processor.

We require Data Processors to:

- process information only on our documented instructions;
- keep information secure;
- ensure that authorised staff are subject to confidentiality requirements;
- assist us in meeting our data protection responsibilities;
- notify us of personal data breaches;
- delete or return information when the service ends;

- allow appropriate compliance checks and audits.

We carry out proportionate checks before appointing processors and enter into written data processing agreements as required by UK GDPR.

15. Sharing information with the Department for Education

We are required to provide information about pupils to the Department for Education through statutory data collections, including the School Census and Early Years Census.

The Department for Education uses this information to:

- administer education;
- calculate and allocate funding;
- monitor educational policy;
- support school accountability;
- produce statistics;
- support research;
- safeguard and promote the welfare of children.

Each statutory data collection has its own legal basis. The relevant legislation is identified in the applicable DfE census or data collection guidance.

DfE guidance states that a school's privacy notice must explain what pupil data is shared with the Department for Education.

16. National Pupil Database

The Department for Education stores information collected from schools and other organisations in the National Pupil Database.

The National Pupil Database contains information about pupils in schools and educational settings in England. The Department for Education may share information from the database with organisations that promote children's education or wellbeing, conduct approved research or produce statistics.

The Department for Education is responsible for deciding whether information from the National Pupil Database may be shared. Sharing is subject to legal controls, approval processes and data security arrangements.

Further information about the National Pupil Database and how the Department for Education uses pupil information is available on [GOV.UK](https://www.gov.uk).

17. Research and statistics

We may use or share pupil information for research, archiving or statistical purposes where this is lawful and appropriate.

Where possible, information will be anonymised or pseudonymised. Appropriate safeguards will be applied to protect pupils' rights and prevent information from being used to make inappropriate decisions about individual pupils.

We will not sell pupil personal information for commercial marketing purposes.

18. International transfers

We do not routinely transfer pupil information outside the United Kingdom.

Some approved service providers may store or access information outside the UK. Before allowing this, we will ensure that the transfer complies with UK data protection law and that appropriate safeguards are in place.

Safeguards may include:

- UK adequacy regulations;
- legally approved contractual clauses;
- the UK International Data Transfer Agreement or Addendum;
- appropriate security and risk assessments;
- another lawful transfer mechanism.

Further information about international transfers can be requested from the Data Protection Officer.

19. Automated decision-making and profiling

The Trust does not currently make decisions about pupils solely by automated means where those decisions would have a legal or similarly significant effect.

If this changes, we will:

- explain the automated process;
- identify the lawful basis;
- explain the likely consequences;
- introduce appropriate safeguards;
- provide a route for human review or intervention where required;
- update this privacy notice.

The Data (Use and Access) Act 2025 has amended aspects of the rules relating to automated decision-making, but safeguards remain necessary, particularly when children's or special category information is involved.

20. Pupils' data protection rights

Depending on the circumstances and the lawful basis being used, pupils have the following rights:

The right to be informed

To receive clear information about how their personal information is used.

The right of access

To request a copy of the personal information held about them. This is known as a Subject Access Request.

The right to rectification

To ask for inaccurate or incomplete information to be corrected.

The right to erasure

To ask for information to be deleted in certain circumstances. This right does not apply where information must be retained to meet a legal obligation or perform a public task.

The right to restrict processing

To ask us to limit how information is used in certain circumstances.

The right to data portability

To receive information in a structured, commonly used and machine-readable format where the legal conditions for this right apply.

The right to object

To object to certain processing, including processing based on public task or legitimate interests, subject to the legal circumstances.

Rights relating to automated decision-making

To receive safeguards and request human involvement where a significant decision is made solely by automated means.

The right to withdraw consent

Where processing is based on consent, consent may be withdrawn at any time.

Not all rights apply in every circumstance. We will explain our decision if we are unable to comply with a request.

Children have the same data protection rights as adults, but how those rights are exercised depends on the child's capacity and level of understanding.

21. Subject Access Requests

A Subject Access Request may be made verbally or in writing.

We may request information to:

- confirm the identity of the requester;
- confirm the requester's authority to act for the pupil;
- locate the information requested;
- clarify the scope of the request.

We will normally respond within one calendar month. Where a request is complex or a number of requests have been received from the same person, the response period may be extended by up to a further two months. The requester will be informed within the initial one-month period if an extension is necessary.

We will carry out searches that are reasonable and proportionate, in accordance with current data protection legislation.

Requests should be sent to the school, Trust or Data Protection Officer using the contact details below.

22. Data protection complaints

If a pupil, parent or carer has concerns about how personal information has been handled, they should raise the concern with the Trust in the first instance.

Concerns or complaints may be submitted to:

Kirsty Osman, Chief Executive Officer

Four Hills Education Trust
Grainger Drive
Leegomery
Telford
TF1 6UJ

Telephone: 01952 387640

Email: Kirsty.osman@fourhillseducationtrust.org.uk

The Trust's Data Protection Complaints Procedure and electronic complaint form are available through the Trust website or on request.

We will:

- take appropriate steps to help individuals submit a complaint;
- acknowledge a data protection complaint within 30 days;
- investigate the complaint appropriately;
- keep the complainant informed about progress;
- respond without undue delay;
- explain the outcome of the complaint.

These arrangements reflect the data protection complaint requirements introduced by the Data (Use and Access) Act 2025.

If the complainant remains dissatisfied, they may raise the matter with the Information Commissioner's Office.

Information Commissioner's Office

Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Telephone: 0303 123 1113

Website: www.ico.org.uk/make-a-complaint/

23. Contacting our Data Protection Officer

The Trust has appointed a Data Protection Officer to provide independent advice and monitor compliance with data protection law.

Data Protection Officer: Rob Montgomery / Sarah Daffern

Email: IG@telford.gov.uk

Telephone: 01952 383103

The Data Protection Officer can be contacted about:

- this privacy notice;
- how pupil information is used;
- data protection rights;

- Subject Access Requests;
- requests to correct, restrict or delete information;
- information sharing;
- data protection concerns or complaints.

24. Changes to this privacy notice

We will review this privacy notice at least annually and whenever there is a significant change to:

- the law;
- DfE or ICO guidance;
- the information we collect;
- the purposes for which information is used;
- our systems or service providers;
- our data-sharing arrangements.

The latest version will be available on the Trust and school websites.