

The Howard Partnership Trust

Pupils' Privacy Notice

Data controller:

The Howard Partnership Trust, ICT Department, Lower Road Effingham, Surrey, KT24 5JR.

Data Protection Officer: dpo@thpt.org.uk

Under UK Data Protection law, individuals have a right to be informed about how The Howard Partnership Trust (THPT) 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.

The Howard Partnership Trust (THPT) collects and processes personal data relating to its pupils to provide their education and look after their wellbeing while they are with us. THPT is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does THPT collect?

The personal data we hold

We hold some personal information about you to make sure we can help you learn and look after you at school.

For the same reasons, we get information about you from some other places too – like other schools, the local council and the government.

This information includes:

- Your contact details and personal identifiers (name, address, Unique Pupil Number)
- Your assessment and attainment results (KS1, phonics post 16 courses enrolled for and any relevant results)
- Your attendance records (including at previous schools, sessions attended, number of absences and reasons)
- Your characteristics, like your ethnic background, language, free school meal eligibility or any special educational needs (including needs and ranking)
- Any medical conditions you have, and your doctor's contact details (allergies, medication and dietary requirements, child health and dental health)
- Details of any behaviour issues or exclusions (any relevant alternative provisions put in place)
- Safeguarding information (such as court orders and professional involvement)
- Photographs and video / audio recordings
- CCTV images
- Catering and Free School Meal management information

- Trips and activities information

This list is not exhaustive and may be updated. We may also hold data about pupils that we have received from other organisations, including schools, local authorities and the DfE.

Why we collect and use this data

We use this data to help run the school, including to:

- Get in touch with you and your parents when we need to
- Support pupil learning and development of teaching practices
- To monitor and report on pupil attainment and progress
- Track how well the school as a whole is performing
- Look after your wellbeing
- To meet statutory duties placed upon us by the DfE for data collections
- To keep you safe (food allergies, emergency contacts, doctor's details and CCTV)
- To support the professional development of staff

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
- We need to use it to carry out a task in the public interest (to provide you with an education)
- (UK GDPR - Article 6)
- For example, when we share attendance data with the DfE or as a Recognised Legitimate Interest – UK GDPR 6(1) sharing to safeguard a vulnerable young person.
- Sometimes, we may also use your personal information where:
- You, or your parents/carers have given us permission to use it in a certain way
- We need to protect your interests (or someone else's interest)
- In addition, concerning special category data we may need to process for preventative medicine or public health reasons. (UK GDPR - Article 9)

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 this information

Pupil data is essential for the school's operational use

While in most cases you, or your parents/carers, must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data. We will always tell you if it's optional. If you must provide the data, we will explain what might happen if you do not.

We will also receive information from previous schools by Common Transfer File (CTF) or secure transfer.

How we store this data

We will keep personal information about you while you are a pupil at our school. We may also keep it after you have left the school, where we are required to by law.

We keep information about pupils as per our retention schedule and policy. A copy can be provided on request.

Data sharing

We do not share personal information about you with anyone outside the trust without permission from you or your parents/carers, 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 may share personal information about you with:

- Our local authority – to meet our legal duties to share certain information with it, such as concerns about pupils' safety and exclusions
- The Department for Education DfE
- Youth support services (Pupils aged 13+)
- Your family and representatives
- Schools within our Trust
- Educators and examining bodies (Schools that pupils attend after leaving us)
- Our regulator (the organisation or "watchdog" that supervises us), e.g. Ofsted
- Suppliers and service providers – so that they can provide the services we have contracted them for
- Financial organisations
- Central and local government
- Our auditors
- Survey and research organisations
- Health authorities – NHS - School Nurse
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations

- Police forces, courts, tribunals
- Professional bodies
- Fischer Family Trust
- Student destinations upon leaving school
- Communication organisations to facilitate trips and events

Parents: we will share your information with members of staff, other agencies and, where you have agreed, to ensure the functioning of a contract, with third-party processors who provide services to the school. If you have given us your National Insurance Number, we will share this with the Local Authority to check for Free School Meal eligibility.

Data shared with the DfE and the LA are shared using Common Transfer Files or by encrypted methods

Youth support services

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
- careers advisers

The information shared is limited to the child's name, address and date of birth. 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 youth support service via a Common Transfer File.

Pupils aged 16+

We will also share certain information about pupils aged 16+ with our local authority (Surrey) 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
- careers advisers

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

Data is securely transferred to the youth support service via a Common Transfer File.

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

Department for Education

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections e.g. phonics screening and the school census. We are required to share information about our pupils with the Department for Education (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 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' section.

Automated decision-making

THPT does not make decisions about pupils based on automated decision-making.

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 GCSE 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-forschools>

The National Pupil Database (NPD)

Much of the data about pupils in England goes on to be 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-databasenpd-privacy-notice/national-pupil-database-npd-privacy-notice>

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/dfeexternal-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 that 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>

Local Authorities

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.

Transferring data internationally

Where we share data with an organisation that is based outside the European Economic Area, we will protect your data by following data protection law.

Your rights

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact your school principal or DPO@THPT.org.uk

You also have the right to:

- ask us for access to information about you that we hold.
- be informed about the collection and use of your personal data.
- have your personal data rectified if it is inaccurate or incomplete

- request the deletion or removal of personal data where there is no compelling reason for its continued processing.
- restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics.
- not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you
- withdraw consent at any time where relevant.
- Complain to the ICO.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- Right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- Right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- Right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent.

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance by completing the form on our school website and finally if not satisfied directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

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. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the **Principal of the school**.

Complaints

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we've done something wrong.

You can make a complaint at any time by contacting our data protection officer via the form on the website

You can also complain to the Information Commissioner's Office in one of the following ways:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

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

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer: e. dpo@thpt.org.uk

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 June 2026.

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