

Privacy Notice – Learners and Families

2025 - 2026

‘Because Children Deserve Better’

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Policy number:	7.22 V2
Date:	December 2025
Next Review Date:	December 2026

1. Introduction

The UK General Data Protection Regulation (UK GDPR) works with the Data Protection Act 2018 to form the UK's data protection framework. The UK GDPR sets out how people's personal data is processed and kept safe, and the legal rights individuals have over their own data.

This privacy notice explains how Pivot collects, uses, and protects personal information about:

- Our pupils (referred to as 'learners' in this notice)
- Parents and carers (referred to as 'parents' in this notice)

We are committed to protecting your privacy and being transparent about what information we hold and how we use it.

2. Data controller

Pivot is the data controller for the personal information we process. This means we decide how and why your data is processed.

3. What information we collect

Information about learners

We collect and process the following information about our learners:

Personal details:

- Name, date of birth, address, and contact details
- National Insurance number (for older learners)
- Photographs and video recordings

Characteristics:

- Gender, ethnicity, language and nationality
- Free school meal eligibility

Attendance information:

- Attendance records, including reasons for absence
- Details of any authorised or unauthorised absences

Assessment and attainment:

- Academic progress and achievements
- Test and examination results
- Records of any special educational needs or disabilities (SEND)

Behaviour and exclusions:

- Behaviour records, including any sanctions or rewards
- Records of any exclusions or serious incidents

Medical and health information:

- Medical conditions, allergies, and dietary requirements
- Information about any medication needed during the school day
- Accident and injury reports

Safeguarding information:

- Records of any safeguarding concerns or child protection issues
- Information from social care or other agencies

Special category data:

We may also collect 'special category' personal data, which needs extra protection. This includes:

- Information about physical or mental health
- Racial or ethnic origin
- Religious beliefs

Information about parents

We collect and process the following information about parents:

Contact information:

- Names, addresses, telephone numbers, and email addresses
- Emergency contact details
- Information about who has parental responsibility

Financial information:

- Information needed to process payments for school trips, meals, or other services
- Free school meal eligibility

Communication records:

- Records of communications between parents and the school
- Responses to school surveys or consultations

4. Lawful basis for processing

Under the UK GDPR, processing of the data held is lawful if at least one lawful basis applies. The bases which we rely on for processing personal information, which is collected and used for the reasons listed above, are as follows:

- Consent (Article 6(1)(a)) – we have permission from you to process the personal data. You do have the right to withdraw your consent at any time.
- Contract (Article 6(1)(b)) – we collect and process personal data necessary for the performance of a contract.
- Legal Obligation (Article 6(1)(c)) – we collect and process personal data so we can comply with the law.
- Vital Interests (Article 6(1)(d)) – collecting or using the information is needed when

someone's physical or mental health or wellbeing is at urgent or serious risk.

- Public Task (Article 6(1)(e)) – we have to collect or use your information to carry out a task laid down in law, which the law intends to be performed by an organisation such as ours.
- Legitimate Interest (Article 6(1)(f)) – for the purposes of our legitimate interest.

For learners, we use personal information to:

- Support teaching and learning
- Monitor and report on academic progress
- Provide appropriate pastoral care and support learner wellbeing
- Assess the quality of our services
- Keep children safe and meet our safeguarding responsibilities
- Comply with our legal obligations, including:
 - Reporting to the Department for Education (DfE)
 - Sharing information with local authorities
 - Meeting health and safety requirements
 - Administer admissions and manage waiting lists
 - Track attendance and manage absences
 - Provide medical care and support
 - Manage behaviour and exclusions
 - Arrange school trips and activities
 - Provide careers guidance (for secondary learners)

For parents and carers, we use personal information to:

- Communicate about your child's education, wellbeing, and school life
- Keep you informed about school events, activities, and important information
- Respond to any queries or concerns you may have
- Meet our safeguarding responsibilities
- Comply with legal obligations

5. Marketing

Where a family member gives us consent, we may send them marketing information by text message or email, such as for promoting school events, campaigns or charities. Consent can be withdrawn at any time by contacting the school office.

6. Who we share your information with

We may share personal information with:

Government departments and agencies:

- The Department for Education (DfE)
- Independent Schools Association
- Independent School Inspectorate
- Local authorities

Educational and examination bodies:

- Examination boards
- Schools your child may transfer to
- Further education providers

Health and welfare organisations:

- NHS and health professionals
- School nurses
- Educational psychologists
- Therapists and counsellors

Safeguarding and social care:

- Children's social care services
- Police and law enforcement agencies (where necessary)
- Multi-agency safeguarding teams

Other organisations:

- Our IT provider
- Providers of school trips and activities
- Photography companies (with consent)

Department for Education (DfE) data sharing

The DfE collects personal data from schools through various statutory data collections. The law requires schools to pass certain information to the DfE.

The DfE may share information with other organisations when the law allows it. You can find more information about how the DfE uses learner data in their privacy notice:

- For learners: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>
- For parents: Contact the school for more information

We will not share your personal information with anyone else without your consent unless the law allows or requires us to do so.

National Pupil Database (NPD)

We have to provide information about learners to the Department for Education as part of data collections such as the school census.

Some of this information is then stored in the National Pupil Database, which is managed by the Department for Education and provides evidence on how schools are performing. This, in turn, supports research.

The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards and others.

The Department for Education may share information from the database with other organisations, such as organisations that promote children's education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data.

You can find more information about this on the Department for Education's webpage on how it collects and shares personal data.

You can also contact the Department for Education if you have any questions about the database.

7. How long we keep your information

We keep personal information for different lengths of time depending on what it is and whether we have a legal obligation to keep it.

We only keep your information for as long as necessary to fulfil the purposes we collected it for, including for legal, accounting, or reporting requirements. Further information can be found in Pivot's data retention schedule, available on the Pivot website.

When information is no longer required, we will securely destroy or delete it.

8. Transferring data internationally

We may share personal information about learners with international third parties (organisations, companies, etc, that are based outside the UK), where different data protection legislation applies.

Where we transfer your personal data to a third-party country or territory, we will follow UK data protection law.

9. Your rights

Under the UK GDPR, individuals have the right to:

- Be informed about how their data is used, typically through privacy notices
 - Have access to their data, such as through subject access requests
 - Have inaccurate or incomplete information about them corrected
 - Have their data deleted where there is no compelling reason for its continued use
 - Block or restrict processing of their data
 - Obtain and reuse their data for their own purposes across different services ('data portability')
- Object to the processing of their data for particular purposes
- Not be subject to an automated decision made through the use of data

For learners:

Learners have rights over their own data. However, for younger learners, these rights are usually exercised by parents on their behalf.

Children aged 12 or over are usually considered old enough to understand their data protection rights and the implications of making a request, but this should be a case-by-case decision.

For parents:

Parents can exercise data protection rights on behalf of their children if the child is not mature enough to understand these rights themselves.

Parents also have rights over their own personal data that we hold.

Subject Access Requests

You have the right to access the personal data we hold about you or your child. We must comply as soon as we can, at the latest within 1 month of receiving the request.

To make a subject access request, please contact our Data Protection Officer using the details at the end of this document.

Right to withdraw consent

Where we process data based on consent (for example, for biometric data or photographs), you have the right to withdraw that consent at any time.

10. Contact

If you have any concerns about how we are handling your personal data or your child's personal data, please contact our Data Protection Officer in the first instance:

Sarah Howarth
sarah.howarth@pivot-group.co.uk.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO):

Website: www.ico.org.uk
Telephone: 0303 123 1113