

PRIVACY NOTICE FOR PUPILS & STAFF

The Policy is available to the school staff on the 'Staff Shared'

We have a whole school approach to safeguarding, which is the golden thread that runs throughout every aspect of Landon school. All our school policies support our approach to safeguarding (pupil protection). Our fundamental priority is our pupils and their wellbeing; this is first and foremost.

Scope: All who work, volunteer or supply services to our school have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours, including activities away from school. All new employees and volunteers are required to state that they have read, understood and will abide by this policy and its procedural documents and confirm this via the signing of their employment contract.

Legal Status: Complies with The Education (Independent School Standards) (England) Regulations currently in force. **Monitoring and Review:** These arrangements are subject to continuous monitoring, refinement, and audit by the Headteacher. The Proprietor and Advisory Board will undertake a full annual review of this document, inclusive of its implementation and the efficiency with which the related duties have been implemented. This review will be formally documented in writing. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay. All staff will be informed of the updated/reviewed arrangements and it will be made available to them in writing or electronically.

Policy Agreed: September 2025
Date Published: September 2025
Next Review: September 2027

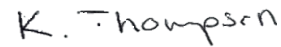
Signed:



Mr Jody Tranter
Headteacher



Mr Andy Thompson
Proprietor who is the Chair of the Advisory
Board



Katie Thompson
Proprietor's agent

Introduction

This privacy notice describes how we collect and use personal information about pupils, in accordance with the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018, section 537A of the Education Act 1996 and section 83 of the Children Act 1989.

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

Who Collects This Information

Landon School is a 'data controller.' This means that we are responsible for deciding how we hold and use personal information about pupils and parents.

Categories of Pupil Information We Collect, Process, Hold and Share

We may collect, store and use the following categories of personal information about you:

- Personal information such as name, pupil number, date of birth, gender and contact information
- Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance details (such as sessions attended, number of absences and reasons for absence)
- Performance and assessment information
- Behavioural information (including exclusions)
- Special educational needs information, including diagnosis, support needs and Education, Health and Care Plans
- Relevant medical information, including diagnoses, medication, allergies, and healthcare plans
- Safeguarding information where relevant to protecting pupil welfare
- Images of pupils engaging in school activities, and images captured by the school's CCTV system
- Information about the use of our IT, communications and other systems, and other monitoring information

Collecting This Information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the UK General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

How We Use Your Personal Information

We hold pupil data and use it for:

- Pupil selection (and to confirm the identity of prospective pupils and their parents)
- Providing education services and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs
- Supporting pupils with special educational needs and disabilities, including arranging appropriate support and interventions
- Informing decisions such as the funding of schools
- Assessing performance and to set targets for schools
- Safeguarding pupils' welfare and providing appropriate pastoral (and where necessary medical) care
- Supporting teaching and learning
- Giving and receiving information and references about past, current and prospective pupils, and to provide references to potential employers of past pupils

- Managing internal policy and procedure
- Enabling pupils to take part in assessments, to publish the results of examinations and to record pupil achievements
- To carry out statistical analysis for diversity purposes
- Legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care
- Enabling relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate
- Monitoring use of the school's IT and communications systems in accordance with the school's IT security policy
- Making use of photographic images of pupils in school publications, on the school website and on social media channels
- Security purposes, including CCTV
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school

The Lawful Bases on Which We Use This Information

We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- **Consent:** the individual has given clear consent to process their personal data for a specific purpose
- **Contract:** the processing is necessary for a contract with the individual
- **Legal obligation:** the processing is necessary to comply with the law (not including contractual obligations)
- **Vital interests:** the processing is necessary to protect someone's life
- **Public task:** the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law
- **Legitimate interests:** the processing is necessary for our legitimate interests or those of a third party, except where such interests are overridden by your interests or fundamental rights
- **The Education Act 1996:** for Departmental Censuses 3 times a year. More information can be found at: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

Special Category Data

As a special educational needs school, we process 'special category data' about our pupils, including information about disabilities, special educational needs, health conditions, and ethnicity. This type of data requires additional protection under data protection law.

We process special category data under the following conditions in Article 9(2) of the UK GDPR:

- **Article 9(2)(b)** - for compliance with employment, social security and social protection law purposes
- **Article 9(2)(g)** - for substantial public interest purposes under Schedule 1 of the Data Protection Act 2018, specifically for equality of opportunity and safeguarding children and individuals at risk

- **Article 9(2)(h)** - for health and social care purposes, including the management of health and social care systems
- **Explicit consent** - where required for purposes that fall outside the above conditions, we will seek your explicit consent

We need all the categories of information in the list above primarily to allow us to comply with legal obligations. Please note that we may process information without knowledge or consent, where this is required or permitted by law.

Sharing Data

We may need to share your data with third parties where it is necessary. There are strict controls on who can see your information. We will not share your data if you have advised us that you do not want it shared unless it's the only way we can make sure you stay safe and healthy or we are legally required to do so.

We share pupil information with:

- The Department for Education (DfE) - on a statutory basis under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013
- Ofsted
- Other schools that pupils have attended or will attend
- NHS and healthcare professionals
- Educational psychologists and specialist assessors
- Speech and language therapists
- Occupational therapists
- Child and Adolescent Mental Health Services (CAMHS)
- Other healthcare professionals involved in pupil care
- Welfare services (such as social services)
- Law enforcement officials such as police, HMRC
- Local Authority Designated Officer (LADO)
- Professional advisers such as lawyers and consultants
- Support services (including insurance, IT support, information security)
- The Local Authority that funds the pupil's placement
- Exam boards and awarding bodies

Some of these organisations are 'data processors' who process data on our behalf under our instructions (such as IT support providers), while others are 'data controllers' with their own independent responsibility for your data (such as DfE, Ofsted, NHS, and Local Authorities).

Recently the Department for Education have requested more regular data sharing on pupil attendance to help support those vulnerable and to assist with intervention strategies. Further information on how the Department for Education collects this data will be made available on the school website.

Information will be provided to those agencies securely or anonymised where possible. The recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law. We do not share information about our pupils with anyone without consent unless otherwise required by law.

Why We Share This Information

For example, we share students' data with the DfE on a statutory basis which underpins school funding and educational attainment. To find out more about the data collection requirements placed on us by the DfE please go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

Storing Pupil Data

The school keeps information about pupils on computer systems and sometimes on paper.

Except as required by law, the school only retains information about pupils for as long as necessary in accordance with timeframes imposed by law and our internal policy.

Retention Periods

We retain different types of information for different periods. For example, we typically retain:

- Pupil records: Until the pupil reaches age 25
- Special educational needs records: Until the pupil reaches age 25
- Education, Health and Care Plans: Until the pupil reaches age 25
- Safeguarding records: Until the pupil reaches age 25 (or longer where serious safeguarding concerns exist)
- Accident and incident records: Until the pupil reaches age 25
- Attendance records: Current year plus 3 years
- CCTV footage: 30 days unless required for incident investigation

Full details on how long we keep personal data for is set out in our Data Retention Policy, which can be found on our website.

International Data Transfers

Your data is stored and processed within the United Kingdom. We do not routinely transfer personal data outside the UK. If we need to do so in exceptional circumstances (for example, if a pupil moves to a school abroad), we will ensure appropriate safeguards are in place.

CCTV and Photography

CCTV

We use CCTV systems for security and safeguarding purposes under our legitimate interests (safety and security of pupils, staff and property). CCTV footage is retained for 30 days unless required for incident investigation, in which case it may be retained longer.

Photography and Video

- Images for educational purposes (e.g., recording pupils' learning and development) are processed under our public task and legitimate interests.
- Images for promotional purposes (website, prospectus, social media, marketing materials) require your consent, which you can withdraw at any time by contacting the school.

Automated Decision Making

Automated decision making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision making in limited circumstances. Pupils will not be subject to automated decision-making, unless we have a lawful basis for doing so and we have notified you.

Security

We have put in place appropriate security measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

The National Pupil Database

The NPD is owned and managed by the Department for Education 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. 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.

We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information about Individual Pupils) (England) Regulations 2013.

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

The department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested
- the arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided pupil information (and for which project), please visit: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

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

Your Rights Under Data Protection Legislation

Under data protection legislation, parents and pupils have the right to:

- Request access to information about them that we hold (subject access request)
- Request rectification of inaccurate information
- Request erasure of their personal information in certain circumstances
- Request restriction of processing in certain circumstances
- Object to processing in certain circumstances
- Request portability of their data to another organisation in certain circumstances
- Withdraw consent at any time where processing is based on consent

Children's Rights

For pupils aged 12 and over who have the capacity to understand, we may request that they exercise their data protection rights directly. For younger pupils or those without capacity to understand (which we assess on an individual basis, particularly for our pupils with additional needs), parents or carers will exercise these rights on their behalf. We will always act in the best interests of the child when determining capacity.

Parental Responsibility

We will normally provide information to both parents unless we are aware of a court order or other legal restriction limiting access. If there are any court orders or agreements affecting parental responsibility or access to information, please inform the school immediately and provide a copy of the relevant documentation.

Requesting Access to Your Personal Data

To make a request for your personal information, or be given access to your child's education record, contact:

Jarka Sekhon, Data Protection Lead Email: dpo@landonschool.co.uk

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is an appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

If you want to request information, please see our Subject Access Request Policy for the procedures we follow.

Right to Withdraw Consent

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose (for example, use of photographs for promotional purposes), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Headteacher. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.



Contact and Complaints

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with the Headteacher in the first instance.

We have appointed a data protection lead to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information, please contact:

Data Protection Lead: Jarka Sekhon, School Business Manager

Email: dpo@landonschool.co.uk

Postal Address: Landon School Harmondsworth, Aviation House, Harmondsworth Lane, Harmondsworth, West Drayton UB7 0LQ

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues, at <https://ico.org.uk/concerns>.

Changes to This Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

This privacy notice is also available in easy-read format for pupils.

Please contact the school office if you would like a copy.