



## **Privacy Notice (How we use pupil information)**

**Newtown Primary School** is a member school of **Stour Vale Academy Trust**. The Trust and the school are joint data controllers for the purposes of Data Protection Law.

### **Why do we collect and use pupil information?**

We collect and use pupil information under the following Acts of parliament and associated legislation:

The Education Act, amendments and accompanying regulations, for example: Section 537A of the 1996 Act enables the education setting to collect information to perform the Department of Education's termly census.

Section 40(2)(a) of the Childcare Act 2006 - early years foundation stage and Section 87 of the Education Act 2002 - key stage 1 and key stage 2, enables primary age education settings to collect information for the assessing and reporting of the national curriculum.

There are various versions of the Education Act both preceding and following the 1996 Act that have influence on what information is required and how it is processed such as: The Education Reform Act 1988, Further and Higher Education Act 1992, Education Act 1994, School Standards and Framework Act 1998, Teaching and Higher Education Act 1998, Education Act 2002, Higher Education Act 2004, Education Act 2005, Education and Inspection Act 2006 and Education Act 2011, The Education (Pupil Information) England Regulations 2005 and associated regulations and statutory instruments.

Where appropriate we also rely on:

The Children Act and subsequent amendments  
The Common Law Duty of Care  
Health and Safety at Work Act  
Working together to Safeguard Children Guidelines (DfE)  
Keeping Children Safe in Education (KCSiE)  
Equality Act 2010  
The Disability Discrimination Act  
Special Educational Needs (SEN) Code of Practice  
Safeguarding Vulnerable Groups Act  
Limitation Act 1980



We collect and use pupil information for the following purposes:

- to support pupil learning;
- to monitor and report on pupil attainment progress;
- to provide appropriate pastoral care;
- to assess the quality of our services;
- to keep children safe (food allergies, or emergency contact details);
- to meet the statutory duties placed upon us for DfE data collections; and
- to comply with the law regarding data sharing.

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

- personal identifiers and contacts (such as name, unique pupil number, contact details and address);
- characteristics (such as ethnicity, language, gender, religion, date of birth, free school meal eligibility);
- special educational needs (including the needs and ranking);
- safeguarding information (such as court orders and professional involvement);
- medical and administration (such as doctor's information, child health, allergies, medication and dietary requirements);
- attendance information (such as sessions attended, number of absences and absence reasons, any previous schools attended);
- assessment and attainment information (such as EYFS, Key Stage or internal academic assessment information, phonics results);
- behavioural information (such as exclusions and any relevant alternative provision put in place).

For a further example of the information typically held by schools, please see the Department for Education (DfE) Common Basic Data Set, here:

<https://www.gov.uk/government/publications/common-basic-data-set-cbds-database>

## **Collecting pupil information**

We collect pupil information via registration forms at the start of the school year or when a child starts school, Common Transfer File (CTF) or secure file transfer from previous school.

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you, at the point of collection, whether you are



required to provide certain pupil information to us or if you have a choice in this, and we will tell you what you need to do if you do not want to share this information with us.

We intend to collect consent to process information for photographs, school trips and parental engagement platforms; please note, you have a right to withdraw consent at any time and can contact the school to do this.

In some cases we may process pupil information following the completion of a legitimate interest assessment, e.g. video conferencing for online learning, where this is necessary and desirable for pupils' education.

If you provide us with contact details of others, for example, in case of emergency or when you may not be available, please ensure that they are aware their information has been passed to the school.

We will also receive the above types of personal information, where relevant, from the previous school/nursery and may also receive information from the Local Authority (LA) and the DfE.

## **Storing pupil data**

The information we collect, use and store about pupils and their parents/carers is retained on our computer systems and in paper files, either until it is updated/superseded or until the pupil leaves the school where it will be passed on to the receiving school in accordance with the Education (Pupil Information) England Regulations 2005. Records are retained by a secondary school for the period of 25 years from the date of birth of the child (plus 6 years if SEN information). Further information on how long schools retain information can be seen in the Information Records Management Society Toolkit for Academies available at this link: [Academy records retention periods](#)

## **Who do we share pupil information with?**

We routinely share pupil information with:

- Relevant staff within the school and Stour Vale Academy Trust
- schools that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- Health Services



- Aperture Portraits  
**Aperture Portraits** is a photography company the school uses to take individual pupil photographs. The personal data used includes the child's name, class, admission number and child's photo.
- Apple School Manager  
**Apple School Manager** is a cloud-based platform the school uses to manage iPads, create and sync pupil accounts from Microsoft Office 365 into Jamf School. The personal data used includes the child's name, email address and class.
- Assembly Pro  
**Assembly Pro** is a cloud-based platform the school uses to monitor pupil attendance and reporting. The personal data used includes the child's name, gender, enrolment, address, assessment, attendance, behaviour, achievements, SEN, language, ethnicity, exclusions, UPN, and pupil photo.
- AvePoint Cloud Backup  
**AvePoint Cloud Backup** is a cloud-based platform the school uses to backup Microsoft Office 365 cloud data from Exchange, OneDrive, SharePoint, and Teams. The personal data used includes the child's name and email address.
- Capita SIMS  
**Capita SIMS** is a cloud-based platform and application the school uses as its Management Information System (MIS). It is used to record and store all the pupil information, assessment data and attendance. The personal data used includes the child's personal details, ethnicity, language, medical needs, dietary needs, SEN information, attendance, photo consent, as well as the name and contact details of parents, carers, and emergency contacts.
- Collins eBooks  
**Collins eBooks** is an app and cloud-based platform the school uses as an online reading resource. The personal data used includes the child's name and year group.
- CPOMS  
**CPOMS** is a cloud-based platform the school uses to record safeguarding, child protection, pastoral and wellbeing information. The personal data used includes the child's name, year group, class, and any safeguarding information regarding the child.
- DfE Attendance Collection  
**DfE Attendance Collection:** is an application used by the DfE to collect daily pupil attendance data via Wonde. The personal data used is child's name, DOB, UPN, gender, attendance codes, and enrolment details.



- E Vouchers

**E Vouchers** is a cloud-based platform the school uses to deliver free school meal (FSM) supermarket vouchers to parents and carers. The personal data used includes the child's name, class, and free school meals indicator, as well as the name and contact details of parents and carers. To enable us to do this we will share your information with E Vouchers to ensure that you are able to receive supermarket vouchers in a timely and efficient manner without the responsibility of delivering of these important messages being placed on pupils.
- e4education

**e4education** is a cloud-based platform the school uses for the creation and modification of the school's website. All images of children are only uploaded if consent is given by the parent/carer. The personal data used includes the child's image.
- EHCP

**EHCP** is an Education Health Care Plan which outlines the pupils needs along with the outcomes and provisions required for the school to provide support. The personal data used includes the child's personal details, and SEN information, as well as the name and contact details of parents and carers.
- Evolve

**Evolve** is a cloud-based platform the school uses to create and manage risk assessment for educational trips and visits. The personal data used includes the child's name, class, and any medical needs.
- Facebook

**Facebook** is an app and cloud-based platform the school uses to share photos, videos and pupils work on the schools Facebook account. All videos and images of children are only shared if consent is given by the parent/carer. The personal data used includes the child's image.
- Google Forms

**Google Forms** is a cloud-based platform the school uses to request electronic information from parents and carers about their child. The personal data used includes the child's personal information, ethnicity, language, medical needs, and dietary needs, as well as the contact information of parents, carers and emergency contacts and photo consent.
- Groupcall Xporter

**Groupcall Xporter** is a cloud-based platform the school uses to sync MIS data with approved third-party applications. The personal data used includes the child's information.



- Hodder Education – Boost Insights  
**Hodder Education – Boost Insights** is a cloud-based platform the school uses to manage and analyse the children's test paper scores. The personal data used includes the child's name, year group, class, DOB, and gender.
- Jamf School  
**Jamf School** is a cloud-based platform the school uses to manage iPads and sync pupil accounts from Apple School Manager to create their iPad login details. The personal data used includes child's name, email address and class.
- Lexia Core5 Reading  
**Lexia Core5 Reading** is an app and cloud-based platform the school uses to assess and improve the children's reading. The personal data used includes the child's name, year group, and class.
- Little Wandle Letters and Sounds Assessment Tracker  
**Little Wandle Letters and Sounds Assessment Tracker** is a cloud-based platform the school uses to record and track progress of phonics assessments. The personal data used includes the child's name, UPN, DOB, gender, FSM, year group, ethnicity, first language, and SEN.
- Mathletics  
**Mathletics** is a cloud-based platform the school uses to support pupils with practising and developing their maths skills. The personal data used includes the child's name, year group and class.
- Microsoft Forms  
**Microsoft Forms** is a cloud-based platform the school uses to request electronic information from parents and carers regarding after school clubs for their child. The personal data used includes the child's name and year group.
- Microsoft Online Services – Microsoft Office 365  
**Microsoft Office 365** is a cloud-based platform the school uses to access E-Mails, OneDrive, SharePoint, Teams etc. The personal data used includes the child's name and email.
- Microsoft Teams  
**Microsoft Teams** is an app and cloud-based platform the school uses to communicate virtually in online meetings with other fellow pupils and staff from Newtown. All images of children are only shown and shared if consent is given by the parent/carer. The personal data used includes the child's name, username, email address, and child's image.
- Numbots  
**Numbots** is an app and cloud-based platform the school uses to support pupils in practising mental addition and subtraction. The personal data used includes the child's name, year group, class,



gender, and username.

- Papercut

**Papercut** is a cloud-based platform the school uses as a print management solution that processes print jobs and monitors print usage and costs. The personal data used includes the child's name, username and email address.

- Parago Health and Safety System

**Parago Health and Safety System** is an app and cloud-based platform the school uses to record the compliance of health and safety assessments and checks. The personal data used includes the child's name, year group, class and accident reporting.

- ParentMail

**ParentMail** is an app and cloud-based platform the school uses to send communications to parents and carers via text and email, and to request online payments for trips and clubs. The personal data used includes the child's name, year group, class, DOB and gender, as well as the name and contact details for Priority 1 and Priority 2 contacts. To enable us to do this we will share your information with Papercut to ensure that you receive vital information about the school and are able to make payments online in a timely and efficient manner without the responsibility of delivering of these important messages being placed on pupils.

- Photo Consent

**Photo Consent** is a cloud-based google form the school uses to request permission from parents and carers for the use of their child's image across the relevant categories. The personal data used includes the child's name, class, and parent or carer photo consent responses.

- Pupil Attendance Registers

**Pupil Attendance Registers** is a system the school uses to record the pupils' attendance twice a day. The personal data used includes the child's name, class, SEN, medical information, PP and any relevant notes.

- Pupil Signing In and Out Sheet

**Pupil Signing In and Out Sheet** is a system the school uses to record the late arrival or early pickup of pupils. The personal data used includes the child's name, class and reason, as well as the name of the parent or carer.

- Purple Mash (2Simple)

**Purple Mash (2Simple)** is a cloud-based platform the school uses to access online applications and educational games. The personal data used include the child's name and class.

- Reception Baseline Assessment

**Reception Baseline Assessment** is a cloud-based platform the



school uses to assess the attainment in maths, literacy and communication and language for the children in reception class at the start of the academic year. The personal data used includes the child's name, UPN, gender, DOB, class, date started in establishment and results from assessment.

- SchoolCloud Parents Evening

**SchoolCloud Parents Evening** is a cloud-based platform the school uses to create and book parents evening appointments. The personal data used includes the child's name, DOB, year group and class, as well as the name and contact details for Priority 1 and Priority 2 contacts. To enable us to do this we will share your information with SchoolCloud Parents Evening to ensure that you are able to book parents evening appointments in a timely and efficient manner without the responsibility of delivering these important messages being placed on pupils.

- Senso Cloud

**Senso Cloud** is a cloud-based platform the school uses to monitor any safeguarding incidents flagged when pupils use the school managed IT devices. The personal data used includes the child's name and username.

- Sign in App

**Sign in App** is a cloud-based platform the school uses as an electronic signing in and out system that records entry and exit times for visitors. The personal data used includes the visitor's name, photo, company, visiting who and car registration.

- Sonar Tracker

**Sonar Tracker** is a cloud-based platform the school uses to record and track pupil assessment data. The personal data used includes the child's name, DOB, class, date of entry, gender, UPN, attendance, FSM, PP, ethnicity, first language, EAL, SEN, in care, and service child.

- Synergy – Sandwell Council

**Synergy – Sandwell Council** is an application used by the local authority to collect monthly pupil data via Wonde. The personal data used includes the child's name, gender, DOB, SEN, ethnicity, first language, EAL, UPN, enrolment details, address and attendance.

- Times Tables Rock Stars

**Times Tables Rock Stars** is an app and cloud-based platform the school uses to support pupils with practising their times tables. The personal data used includes the child's name, year group, class, gender, and username.

- Twitter

**Twitter** is an app and cloud-based platform the school uses to



share photos, videos and pupils work on the schools Twitter account. All videos and images of children are only shared if consent is given by the parent/carer. The personal data used includes the child's image.



- Vaccination UK  
**Vaccination UK** is a service the school uses to administer flu vaccines to pupils. The personal data used includes the child's name, DOB, year group, class and medical information, as well as the name, phone number and email address of the parent or carer confirming or declining consent.
- Wonde  
**Wonde** is a cloud-based platform the school uses as a dashboard to manage and control access to the applications the school subscribe to. The personal data used includes the child's name, year group, and class.
- Wellcomm  
**Wellcomm** is a cloud-based platform the school uses to assess the children's speech and language development. The personal data used includes the child's name, DOB, gender, UPN, EAL, PP, looked after, ethnicity, SEN, and class.
- YouTube  
**YouTube** is an app and cloud-based platform the school uses to upload videos of the children and their work, so they can be shared via a link, QR code, school social media accounts, school website or on the school's YouTube channel. All videos of children are only uploaded if consent has been given by the parent/carer. The personal data used includes the child's image.

We are committed to working with the local authority in protecting and safeguarding children and young people in the Borough. As a consequence we intend, where relevant to do so, to share information with the Multi-Agency Safeguarding Hub (MASH) which is a co-located arrangement of agencies including the local authority, Police, NHS Trusts and Probation Service integrated into a multi-agency team.

The MASH is the single point of contact for safeguarding concerns. The MASH share information appropriately and securely on children or young people in order to take timely and appropriate actions. The teams also provide information and advice across a range of child and family services.

Where a pupil/parent/carer has been involved in an accident, an Accident/Incident Report Form will be completed which will include details of the accident including information about you. This information will be held securely in our online and paper systems and in some cases, depending on the severity of the accident, made accessible to the Trust Central Team. In such instances, the information will be accessed by Trust employees, who legally require access to this data, for purposes related to the accident, and may be shared with others to allow us to comply with our statutory duties.



## Why we share pupil information

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

We share pupils' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

We are required to share information about our pupils with the DfE under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

## 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>.

## 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.

## Department for Education

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 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. For privacy information on the data the Department for Education collects and



uses, please see: <https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3>

### **Requesting access to your personal data**

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 Mr P Rogers, Office Manager.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- a right to seek redress, either through the ICO, or through the courts.

The Trust, in line with statutory guidance, will respond to Subject Access Requests within one calendar month. However, if the request is received during the school holiday, we will liaise with the requestor to seek their agreement to treat receipt of the request as being on the first day back at school and will respond within the timescale outlined above.

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 or 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 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 Headteacher.



## Last updated

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 in April 2026.

## Contact

If you would like to discuss anything in this privacy notice, please contact:

**YourIG Data Protection Officer Service**  
**Dudley MBC**  
**The Council House**  
**Dudley**  
**West Midlands**  
**DY1 1HF**

**Email:** [YourIGDPOService@dudley.gov.uk](mailto:YourIGDPOService@dudley.gov.uk)

**Tel:** 01384 815607

## How Government uses your data

The pupil data that we lawfully share with the 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 (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 goes on to be held in the National Pupil Database (NPD).

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 for Education.

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-npd-privacy-notice/national-pupil-database-npd-privacy-notice>

## Sharing by the Department

The law allows the Department to share pupils' personal data with certain third parties, including:

- schools
- 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's 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 DfE to request access to individual level information relevant to detecting that crime. Whilst numbers fluctuate slightly over time, DfE typically supplies data on around 600 pupils per year to the Home Office and roughly 1 per year to the Police.

For information about which organisations the Department 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/dfе-external-data-shares>



## **How to find out what personal information DfE hold about you**

Under the terms of the UK Data Protection Act 2018, you are entitled to ask the Department:

- 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, you should make a 'subject access request'. Further information on how to do this can be found within the Department's 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 DfE: <https://www.gov.uk/contact-dfe>