



SCHOOL POLICIES

Privacy Notice

This policy was adopted by the Governors on: September 2026

The last review of this policy was: September 2026

This policy is due for review on: September 2028

Signed Headteacher: N. Craddock

Signed Chair of Governing Body: D. Garside

1. About this Privacy Notice

At Hudson Primary School, we collect and use personal information about our pupils and their parents, carers and other family members.

Data protection law requires us to explain clearly what personal information we collect, why we collect it, how we use it, who we may share it with, how we protect it and what rights individuals have in relation to their personal information.

This Privacy Notice explains how Hudson Primary School processes personal information in accordance with the **UK General Data Protection Regulation (UK GDPR)**, the **Data Protection Act 2018** and other applicable data protection legislation.

It applies to personal information relating to:

- pupils;
- parents and carers;
- people with parental responsibility;
- emergency contacts and other individuals connected with a pupil where we hold their personal information.

This notice should be read alongside our wider data protection policies and procedures.

If you have any questions about this notice or how we use personal information, please contact the school office or our Data Protection Officer.

2. Who are we?

Hudson Primary School is the Data Controller for the personal information we process about pupils, parents and carers.

As Data Controller, we are responsible for deciding how and why personal information is processed and for ensuring that it is handled in accordance with data protection law.

Our Data Protection Officer is:

Peter Rafferty
Row 7 Education Limited
peter@row7education.co.uk
07824995148

3. The information we collect

The information we collect and process will depend on the individual circumstances of the pupil and family.

It may include the following categories.

Personal identifiers and contact information

For example:

- pupil's name;
- preferred name;
- date of birth;
- address;
- unique pupil number;
- parent/carer names;
- contact details;
- emergency contacts;
- relationship to the pupil;
- information relating to parental responsibility;
- previous or next school.

Characteristics and equality information

For example:

- sex;
- ethnicity;
- first language;
- nationality where relevant;
- information relating to equality monitoring;
- eligibility for free school meals and other relevant entitlements.

Education and learning information

For example:

- school history;
- assessment information;
- attainment and progress;
- curriculum information;
- phonics and statutory assessment information;
- educational outcomes;
- learning support;
- information about participation in educational activities.

Special educational needs and disability information

For example:

- SEND information;
- identified needs;
- special educational provision;
- reasonable adjustments;
- EHCP information;

- information from specialist services;
- information relating to communication, learning, sensory or developmental needs.

We may process information relating to a pupil's health, disability or other special category data where this is necessary and lawful.

Attendance information

For example:

- attendance records;
- absence;
- reasons for absence;
- lateness;
- attendance support;
- previous attendance information where relevant;
- information relating to persistent or severe absence.

Safeguarding and welfare information

For example:

- safeguarding concerns;
- child protection information;
- information relating to children in need;
- information from children's social care;
- court orders and relevant legal arrangements;
- information received from other agencies;
- pastoral and welfare information;
- information concerning a child's safety or wellbeing.

Health and medical information

For example:

- medical conditions;
- allergies;
- medication;
- dietary requirements;
- health plans;
- emergency medical information;
- information provided by health professionals;
- information required to support a pupil's health and safety at school.

Behaviour information

For example:

- behaviour incidents;

- bullying;
- discriminatory incidents;
- suspensions and permanent exclusions;
- behaviour support;
- restorative work;
- information relating to alternative provision where applicable.

Photographs, video and recordings

We may collect photographs, video recordings and other images for purposes including:

- safeguarding and security;
- identification;
- educational activities;
- school events;
- newsletters and communications;
- the school website;
- social media or promotional material, where appropriate permissions or another lawful basis applies.

Where consent is the lawful basis for a particular use, we will explain this and provide an appropriate opportunity to withdraw consent.

CCTV

CCTV may operate on school premises for purposes including:

- safeguarding;
- security;
- prevention and detection of crime;
- protection of pupils, staff and visitors;
- investigating incidents.

CCTV is managed in accordance with the school's relevant data protection and CCTV arrangements.

Financial and payment information

We may process information relating to:

- school meals;
- trips and activities;
- wraparound care;
- clubs;
- payments and refunds;
- financial assistance;
- free school meals and other entitlements.

Where payments are processed through an external provider, that provider may process personal information on our behalf or as an independent data controller, depending on the service provided.

4. Information we receive from other organisations

We may receive information about pupils and families from other organisations where this is necessary and lawful.

This may include:

- previous schools;
- schools pupils are transferring to;
- Sefton Council;
- the Department for Education;
- children's social care;
- health services;
- educational psychologists;
- speech and language services;
- SEND services;
- other professionals supporting a child;
- police and other safeguarding partners;
- examination and assessment organisations;
- other government departments or public bodies.

We only collect and use information where there is a lawful basis for doing so.

5. Why do we collect and use personal information?

We use personal information to enable us to carry out our responsibilities as a school.

This includes:

- providing education;
- supporting children's learning;
- monitoring attainment and progress;
- identifying and meeting SEND;
- providing appropriate pastoral support;
- safeguarding children;
- supporting attendance and punctuality;
- managing behaviour;
- supporting children's health and wellbeing;
- communicating with parents and carers;
- organising educational visits and activities;
- providing school meals and other services;
- administering payments;
- meeting our legal and statutory responsibilities;
- completing statutory returns;
- managing school operations;
- monitoring and improving the quality of education and services;
- planning and allocating resources;
- maintaining school security;
- preventing and detecting crime;

- responding to complaints and concerns;
- fulfilling our responsibilities to pupils, families and the wider school community.

6. Our lawful bases for processing information

Data protection law requires us to have a lawful basis for processing personal information.

The lawful basis we rely upon will depend on the particular information being processed and the purpose for which it is being used.

The lawful bases that may apply to Hudson Primary School include:

Public task

We may process information where this is necessary for us to perform a task carried out in the public interest or in the exercise of official authority.

This is particularly relevant to the provision and administration of education.

Legal obligation

We may process information where this is necessary for us to comply with a legal obligation.

For example, this may apply to statutory education, attendance, safeguarding or reporting requirements.

Vital interests

In limited circumstances, we may process information where this is necessary to protect someone's vital interests.

This may be relevant in an emergency where an individual's life or safety is at risk.

Consent

We may rely on consent where this is the appropriate lawful basis.

Where we rely on consent:

- we will explain what we are asking permission for;
- consent will be freely given;
- individuals will be able to withdraw consent;
- withdrawing consent will not affect processing that has already taken place lawfully.

Consent is **not** required for processing where another lawful basis applies.

For example, we do not ask for consent simply because we are required by law to provide information to the Department for Education.

7. Special category information

Some information is considered particularly sensitive under data protection law.

This includes information about:

- health;
- disability;
- racial or ethnic origin;
- religious or philosophical beliefs;
- biometric information where used for identification;
- sexual orientation.

We only process special category information where both:

1. an Article 6 lawful basis applies; and
2. an appropriate Article 9 condition applies.

Depending on the circumstances, this may include processing necessary:

- for carrying out obligations in the field of employment and social protection law;
- for reasons of substantial public interest;
- for the provision of health or social care;
- to protect someone's vital interests;
- where explicit consent has been given;
- for other purposes specifically permitted by data protection law.

We may also process information relating to criminal offences where the law permits this and appropriate safeguards are in place.

8. Do parents have to provide information?

Some information is required by law or is necessary for us to provide education and keep children safe.

Other information may be optional.

When we collect personal information directly from you, we will make clear where information is:

- required by law;
- necessary for us to provide a service;
- necessary for safeguarding or another statutory responsibility;
- voluntary.

If you do not provide information that is necessary for a particular purpose, this may affect our ability to provide a service or meet a legal or safeguarding responsibility.

9. How we collect information

We may collect personal information through:

- admission and registration forms;
- school forms;
- parent/carer communications;
- meetings and conversations;
- electronic systems;
- attendance registration;
- assessment systems;
- safeguarding systems;
- payment systems;
- school trips and activity forms;
- correspondence;
- secure information transfers;
- Common Transfer Files when pupils move between schools;
- information from other schools and organisations;
- professional reports;
- statutory data collections.

We may collect information verbally, in writing, electronically, through photographs or recordings, or through other appropriate means.

10. How we use information about parents and carers

We also process personal information about parents, carers and other individuals connected with pupils.

This may include:

- names;
- addresses;
- telephone numbers;
- email addresses;
- relationship to the child;
- parental responsibility;
- emergency contact information;
- communication preferences;
- information relevant to safeguarding;
- information necessary to administer school services.

We use this information to:

- communicate with families;
- provide information about children's education;
- safeguard children;
- manage attendance;
- arrange meetings;

- provide school services;
- respond to concerns and complaints;
- meet legal obligations;
- maintain accurate school records.

11. Who we share information with

We only share personal information where there is a lawful basis to do so.

Depending on the circumstances, information may be shared with:

- Sefton Council and other relevant local authority services;
- the Department for Education;
- Ofsted;
- other schools;
- early years settings;
- colleges and other education providers;
- examination and assessment organisations;
- health services and healthcare professionals;
- children's social care;
- SEND services;
- educational psychologists and other specialist professionals;
- safeguarding partners;
- the police;
- courts and tribunals;
- government departments and public bodies;
- auditors;
- professional advisers;
- contracted service providers;
- technology and software providers;
- catering, payment and school activity providers;
- transport providers where relevant;
- insurers;
- other organisations where required or permitted by law.

We do not share personal information simply because another organisation asks for it.

We consider whether there is a lawful basis and, where applicable, whether information sharing is necessary and proportionate.

12. Sharing information to keep children safe

There may be circumstances where we need to share information without parental consent because the law allows or requires us to do so.

This may include safeguarding concerns or circumstances where sharing information is necessary to protect a child or another person.

Safeguarding information may be shared with appropriate professionals, including children's social care, the police, health services or other safeguarding partners.

The safety and wellbeing of children is a fundamental responsibility of the school.

13. Sharing information with the Department for Education

Hudson Primary School is required to provide certain pupil information to the Department for Education (DfE), either directly or through Sefton Council.

The DfE receives personal information through statutory data collections, including the School Census and other collections.

The legal requirements for the School Census include **section 537A of the Education Act 1996** and the **Education (Information About Individual Pupils) (England) Regulations 2013**, as amended. Current DfE guidance confirms that submission of the School Census is a statutory requirement and does not depend on parental or pupil consent.

DfE data collections support purposes including:

- school and education funding;
- education policy;
- monitoring and accountability;
- planning;
- research;
- statistical analysis.

The particular data shared depends on the statutory collection.

DfE's current guidance requires schools' privacy notices to explain what personal information is shared with the Department.

14. The National Pupil Database

Some information provided to the Department for Education forms part of the **National Pupil Database (NPD)**.

The NPD is a national collection of pupil information held and managed by the Department for Education.

It contains information collected from sources including schools, local authorities and awarding organisations.

The NPD may contain information including:

- pupil identifiers;
- characteristics;
- SEND information;
- schools attended;

- attendance and absence;
- exclusions;
- assessment and examination results;
- information relating to children's services;
- information about what pupils do after leaving education.

The Department for Education uses this information for purposes including education policy, research, statistics and accountability.

Further information about the National Pupil Database is available through the Department for Education's current privacy notice.

15. School Attendance Data

Schools are required to maintain attendance records and provide attendance information through statutory systems and collections.

The Department for Education operates a national School Attendance Data Collection using pupil-level attendance information.

The current DfE privacy notice for this collection was published in August 2026.

Hudson will process and share attendance information in accordance with statutory requirements and applicable data protection law.

16. Service Providers and Data Processors

We use external organisations to provide some services to the school.

These may include:

- information management systems;
- safeguarding systems;
- communication platforms;
- payment systems;
- catering;
- IT services;
- educational services;
- assessment systems;
- website and digital services.

Where an organisation processes personal information on our behalf, we will ensure appropriate contractual and data protection arrangements are in place.

Where an organisation is independently responsible for its own processing, it will have its own privacy information explaining how it uses personal information.

17. International Transfers

Where personal information is transferred outside the United Kingdom, we will ensure that the transfer is carried out in accordance with applicable data protection law.

This may include using an adequacy decision or appropriate safeguards where required.

We will consider the security and legal protections available when personal information is transferred internationally.

18. How we keep information secure

We take appropriate technical and organisational measures to protect personal information.

These may include:

- secure electronic systems;
- access controls;
- passwords and authentication;
- role-based access;
- secure information transfer;
- staff training;
- confidentiality requirements;
- physical security;
- secure disposal;
- monitoring and review of information security.

Access to personal information is restricted to people who have a legitimate reason to access it.

Staff are expected to maintain confidentiality and follow the school's data protection and information security procedures.

19. How long we keep information

We retain personal information only for as long as it is necessary and in accordance with applicable retention requirements.

The length of time information is retained depends on:

- the type of information;
- the purpose for which it was collected;
- statutory requirements;
- safeguarding requirements;
- legal requirements;
- the school's retention schedule.

Hudson Primary School maintains a **Data Retention Schedule** which sets out appropriate retention periods for different categories of information.

You can request further information about our retention arrangements from the school office or Data Protection Officer.

20. Your data protection rights

Under data protection law, individuals have a number of rights.

Depending on the circumstances and the lawful basis for processing, these may include:

The right to be informed

You have the right to understand how your personal information is being used. This Privacy Notice forms part of how we provide that information.

The right of access

You can ask for a copy of personal information that we hold about you.

This is known as a **Subject Access Request (SAR)**.

The right to rectification

You may ask us to correct inaccurate or incomplete personal information.

The right to erasure

In some circumstances, you may ask us to delete personal information.

This right does not apply where we have a lawful reason or legal obligation to continue processing or retaining the information.

The right to restrict processing

In certain circumstances, you may ask us to restrict how we use your personal information.

The right to object

In certain circumstances, you may object to our processing of your personal information.

The right to data portability

In limited circumstances, you may have the right to receive personal information in a structured, commonly used and machine-readable format and to ask for it to be transferred to another organisation.

Rights relating to automated decision-making

You have rights relating to certain automated decision-making and profiling.

Hudson does not use automated decision-making to make decisions about pupils in a way that removes appropriate human involvement.

Not all rights apply in every situation. The rights available to you depend on the lawful basis and purpose for which we are processing the information.

21. Children's Rights

Children have their own data protection rights.

We recognise that children should be supported to understand:

- what personal information is;
- why schools collect information;
- how information is used;
- who information may be shared with;
- how they can ask questions or raise concerns.

We will communicate information about privacy and data protection in an age-appropriate way.

The Department for Education's current guidance confirms that children have the same data protection rights as adults, although how those rights are exercised may depend on the child's age, maturity and circumstances.

22. Parents and Access to Children's Information

Parents and carers may have rights to request information relating to their child.

However, parental responsibility does not automatically mean that a parent is entitled to access all information held about a child.

When considering requests for information about a child, the school may need to consider:

- the child's age and understanding;
- the child's wishes;
- parental responsibility;
- confidentiality;
- safeguarding;
- the rights of other individuals;
- relevant legal orders or restrictions.

Where appropriate, we may seek advice from our Data Protection Officer or other relevant professionals before responding.

23. Subject Access Requests

If you wish to request access to personal information held by Hudson Primary School, please contact:

Sandra Jones
enquiries@hudsonprimary.co.uk
01515261568

We will manage requests in accordance with the requirements of data protection legislation.

24. Data Protection Concerns and Complaints

If you have a concern about the way Hudson Primary School has collected, used or shared your personal information, we encourage you to contact the school in the first instance.

You can contact:

Data Protection Officer
[see DPO details previous]

If you remain dissatisfied, you have the right to complain to the **Information Commissioner's Office (ICO)**.

Information Commissioner's Office

Website: <https://ico.org.uk/>

The ICO provides independent information and advice about data protection rights and concerns.

25. Changes to this Privacy Notice

We regularly review our Privacy Notice to ensure that it remains accurate and reflects how Hudson Primary School uses personal information.

The notice will be reviewed:

- at least annually;
- when there are significant changes to the way we process information;
- when there are significant changes to data protection legislation or guidance.

The Department for Education's current guidance recommends that school privacy notices are reviewed by the Data Protection Officer at least annually and whenever there is a significant change to processing.

Where a significant change affects how we use personal information, we will provide appropriate information to those affected.

26. Further Information

If you would like more information about how Hudson Primary School handles personal information, please contact the school office or Data Protection Officer.

Further information about data protection in schools is available from the Department for Education and the Information Commissioner's Office.