# Summerhill School

**Privacy Notice (How we use student information)**

We Summerhill School are the data controller for the purposes of Data Protection Law.

**Why do we collect and use student information?**
We collect and use student 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.

There are various versions of the Education Act both proceeding 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)
- 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 student information, for the following purposes:

- to support student learning
- to monitor and report on Student progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to keep children safe (eg food allergies, or emergency contact details)
- to meet the statutory duties placed upon us for DfE data collections
- to comply with the law regarding data sharing
- to provide updates to parents/carers and statutory agencies (eg where a child has an allocated social worker)

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

- Personal identifiers and contacts (such as name, unique student numbers, 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 doctors information, child health, dental 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, post 16 courses enrolled for and any relevant results)

- Behavioural information (such as positive and negative incidents, sanctions, exclusions and any relevant alternative provision put in place)
- Student references and reports

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 student information**

We collect student information via registrations forms at the start of school and Common Transfer File (CTF) from the previous school.

Whilst the majority of student 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 photos, school trips, biometric system (used for school meals and print facilities), administration of emergency first aid**.** Please note, you have a right to withdraw consent at any time and can contact the school to do this.

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 and may also receive information from the Local Authority (LA) and the DfE.

**Storing student data**

The information we collect, use and store about students and their parents/carers is retained on our computer systems and in paper files, either until it is updated/superseded or until the student leaves the school where it will be passed on to the receiving school in accordance with the Education (Student 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 schools available at this link: School records retention periods

**Who do we share student information with?**
We routinely share student information with:

- Relevant staff within the school
- Education providers that students attend after leaving us
- our local authority (including Children's Services)
- the Department for Education (DfE)
- Health Services
- Dudley Performing Arts
- Connexions (Careers advice)
- EBP (Work Experience H&S checks)
- Cunningham (Biometric cashless catering providers)
- Mitie (Provider of building & facilities services under PFI agreement)
- Chartwells (Catering)
- NHS (eg School Nurse)
- Counselling services
- Examination Boards
- Governors

- Other providers of electronic services to the school:
  - Wonde (data sync platform)
  - Groupcall (data sync platform)
  - Welfare Group Call (education data platform)
  - Arbor (main school database for student information)
  - SIPS (specialist provider of support for the use of Arbor)
  - CPOMS (online reporting of safeguarding concerns)
  - Satchel One (online homework diary)
  - Inventry (visitor and staff management system)
  - Parent Evenings Systems (booking system for parents' evenings)
  - Evolve (Online risk assessment for trips and visits)
  - Google Education (communication and workflow system focused on electronic classwork)
  - CLA Education platform (produces digital books)
  - Papercut (Monitor printer usage)
  - Sisra (Assessment data analysis tool)
  - Aspire data Exchange (reporting and data tool)
  - Dr Frost Maths (online learning platform)
  - ClickView (Educational Videos for Teaching & Learning)
  - GL Assessment (CATs tests)
  - Bedrock Learning (Online programme teaching vocabulary)
  - Lexia Learning (literacy programme)
  - Libresoft Library (Library software)
  - Biostore / Cunninghams ID Manager (management solution for cashless catering and printing system
  - Eventbrite (a ticketing website which allows users to browse, create, and promote

local events
  - Seneca (homework and revision platform)
  - Educake (Personalised online learning for ages 11-16)
  - Bounce Together (Monitoring and tracking school wellbeing)
  - Count Me In app (registers students attendance at extra – curricular clubs)
  - Synergy – Dudley Council : Synergy is a Local Authority Children & Young People solution. Each LA has a dedicated Wonde 'app' to ensure that your data is only accessible to the LA requesting it.
  - eGOV Solutions (ePEP - The Official ePEP Platform) : The secure platform tracks attainment and progress in line with national age-related expected achievements and enables local authorities to work in partnership with schools and education providers. Other key areas include live attendance monitoring and pupil premium expenditure.
  - eVouchers (www.evouchers.com) : An effortless online voucher solution for schools and local authorities to send gift cards to families, students or staff

- Other services :
  - Smoothwall monitoring Service (tracking online activity and highlighting risky behaviours)
  - Microsoft Online Services – Microsoft Office 365
  - RM Education (IT services provider)
  - RM SafetyNet (Internet filtering and broadband)
  - RM Unify (Launch Pad to the Cloud - a single sign-on system, application library and management console designed specifically for education

We may use artificial intelligence (AI) within the school's management information system, e.g. Ask Arbor. AI can also be used for automating administrative tasks, content creation and management, streamlining lesson planning, e.g. Oak National Academy, student facing AI teaching tools and teacher facing AI tools. This processing is carried out in line with our legal obligations and public task in delivering education services. AI tools assist staff but do not replace professional judgement, particularly in safeguarding and education and pupil learning decisions. We do not make solely automated decisions that have a significant impact on individuals without informing them and providing appropriate safeguards. All AI use is subject to human oversight, data protection controls, and strict security measures. Where applicable, the school will undertake a data protection impact assessment.

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, 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. Data may also be shared directly with these agencies.

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 student/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 passed to the Corporate Health and Safety Team at the local

authority. This information will be accessed by Dudley MBC employees, who legally require access to this data, for purposes related to this incident, and may be shared with others to allow us to comply with our statutory duties'.

**Aged 14+ qualifications**
For students enrolling for post 14 qualifications, the Learning Records Service will give us a student's unique learner number (ULN) and may also give us details about the student's learning or qualifications.

**Why we share student information**
We do not share information about our students with anyone without consent unless the law and our policies allow us to do so.

We share students' 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 students with our local authority (LA) and the Department for Education (DfE) under section 3 of The Education (Information About Individual Students) (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.

**Youth support services**

**What is different about pupils aged 13+?**
Once our students reach the age of 13, we also pass student 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 507Bof the Education Act 1996.

This enables them to provide services as follows:

- Youth support services
- Careers advisors

A parent or guardian can object to any information in addition to their child's name, address and date of birth being passed to their local authority or provider of youth support services by informing us. This right is transferred to the child / pupil once they reach age 16.

For more information about services for young people, please visit our local authority website: http://www.dudley.gov.uk

For more information about young people's services, please go to the National Careers Service page at https://nationalcareersservice.direct.gov.uk/aboutus/Pages/default.aspx

It is strongly recommended that pupils and their parents consider the importance and value of the information being shared with Youth Support Services as this information is used to identify young people within Dudley schools who will need support from the Connexions service to move to a positive destination after leaving school and therefore complies with the Raising of the Participation Age.

## Local Authorities

We may be required to share information about our students 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: section 3 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

And https://www.gov.uk/government/publications/privacy-information-key-stage-4-and-5-and-adult-education

**Requesting access to your personal data**

Under data protection legislation, parents and students 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 Mrs Vicki Poole (Business 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

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.

# Summerhill School

## 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 Mrs Vicki Poole (Business Manager).

## Data Use and Access Act 2025 (DUAA)

Under the Data Use and Access Act 2025 (DUAA), schools are required to provide electronic complaints form for individuals who wish to raise concerns about how their personal data is handled.

If you have a complaint, please complete the DUAA Complaints Form by clicking on this link **DUAA Complaints Form**

## 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 November 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
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)

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**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.
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, the DfE typically supplies data on around 600 pupils per year to the Home

Office and roughly 1 per year to the Police (national figures, not Summerhill-specific).

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/dfe-external-data-shares

# Summerhill School

## 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