

Privacy Notice

September 2025
v3.0

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1. Introduction

This privacy notice explains how Pele Trust and its schools collect, use, store and share personal information about:

- Pupils
- Parents and carers
- Staff
- Job applicants
- Visitors and other individuals who interact with our schools

We are committed to handling personal data transparently, securely and in compliance with data protection law, including the UK GDPR, the Data Protection Act 2018, and the Data (Use and Access) Act 2025.

2. Categories of Personal Information We Collect and Use

2.1 For Pupils

- Name, date of birth, parent/carers contact details, pupil ID, address, pronoun preferences
- Characteristics (e.g. gender, ethnicity, language, nationality, country of birth)
- Free school meal eligibility
- Attendance and exclusion records and absence reasons
- Attainment and exam data
- Special educational needs and disabilities (SEND) and related provision
- Behaviour, exclusions, and sanctions
- Medical and health data, allergies, care plans
- Welfare information
- Safeguarding disclosures and referrals
- Photographs, videos, audio recordings (e.g. performances, school use)
- CCTV images
- Biometric data (e.g. for cashless catering)
- Use of online learning systems, digital access logs and other school communication systems

2.2 For Parents/Carers

- Name and contact details
- Family circumstances and relationships to pupils
- Financial information (e.g. hardship funding, childcare vouchers)
- Legal and safeguarding records (e.g. convictions, court orders)
- Communication and consent history
- CCTV images

2.3 For Staff and Job Applicants

- Name, contact details, NI and teacher number
- Employment history, qualifications, and references
- Contractual details (e.g. role, salary, hours)
- Payroll, tax and pension data
- Absence, medical, appraisal, and performance records
- Disciplinary and grievance data
- Vetting information (e.g. DBS, barred list status, right to work, criminal convictions)
- ID documentation
- Trade union membership (where applicable)
- CCTV images and access logs
- ICT system usage metadata

2.4 Special Category Data

We may process special category data for all groups, including:

- Gender
- Age
- Racial or ethnic origin
- Religious or philosophical beliefs
- Health information, including physical and mental health, disabilities, dietary or care needs
- Marital status
- Biometric data used for identification
- Trade union membership (staff)
- Sexual orientation (e.g. in safeguarding or HR contexts)

This data is processed under additional lawful conditions (UK GDPR Article 9), including:

- Employment or social protection law
- Substantial public interest (e.g. safeguarding)
- Health or social care provision
- Explicit consent (where applicable)

Where special category data is shared during safeguarding disclosures, we rely on substantial public interest and legal duties under the Children Act 1989 and Keeping Children Safe in Education.

3. Why We Use Your Information

3.1 Pupils and Parents/Carers

- Delivering education and curriculum support
- Monitoring progress and reporting attainment
- Safeguarding, pastoral care and promoting wellbeing
- Managing behaviour and pastoral care
- Supporting SEND and additional needs provision
- Recording attendance and improving participation

- Communicating with families about school life
- Organising trips, enrichment and extracurricular activities
- Maintaining standards and meeting expectations (e.g. complaints and investigations)
- Manage and administer the Trust and school estate and property
- Ensure our information and communication systems, equipment and facilities are used appropriately, legally and safely.
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3.2 Staff

- Administering employment contracts and payroll
- Ensuring fair and safe recruitment, and regulatory compliance
- Supporting performance management and CPD
- Managing absences and occupational health
- Completing workforce reporting and audits
- Effective financial management

3.3 General Trust Functions

- Meeting legal duties (e.g. under the Education Act, Children Act, Employment law)
- Ensuring site and system security (e.g. CCTV, access logs)
- Responding to queries, concerns, complaints or legal claims
- Supporting financial planning, governance and compliance
- Preventing and detecting crime, fraud, or safeguarding risk

4. Lawful Bases for Processing

We will only process personal data where we have a lawful basis under Article 6 of the UK GDPR. These include:

- Public task - to perform functions laid down in law
 - 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. All of your data protection rights may apply, except the right to erasure and the right to portability.
- Legal obligation - to meet statutory duties
 - We have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Contract - for employment or service delivery
 - we have to collect or use the information so we can enter into or carry out a contract with you. All of your data protection rights may apply except the right to object.
- Legitimate interests - for internal functions and stakeholder engagement
 - We collect or use your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We process personal data under the lawful basis of legitimate interests for activities that support the education, development, and wellbeing of our pupils. This includes, but is not limited to: Monitoring attendance and engagement Tracking academic progress and providing appropriate

interventions Supporting pupil welfare, including emotional, social, and behavioural needs Communicating with parents and carers regarding progress, support, or concerns Facilitating pastoral care and inclusion strategies Coordinating with external agencies (e.g. social care, health services) where necessary for the pupil's education and wellbeing Why this is necessary These processing activities are essential to fulfil our core role as an education provider. They allow us to identify and respond to a child's needs early, ensure each pupil can access appropriate educational and welfare support, and promote better outcomes for all children.

- Vital interests - to protect life or wellbeing in an emergency
 - Collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.
- Consent - for optional uses, such as publicity, marketing, or alumni events
 - We have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.

Where special category data is processed, we also identify a lawful condition under Article 9. (See Section 2 above.)

We do not process any personal data through automated decision-making or profiling.

For a detailed breakdown, see Appendix 1: Lawful Basis Matrix.

5. Where we get personal information from

- Directly from you
- Regulatory authorities (eg HMRC)
- Parents or carers
- Local authorities or local councils
- Social services
- Other education establishments
- Health care providers
- CCTV footage or other recordings
- Publicly available sources
- Previous employers

6. How Long We Keep Your Data

We only retain personal data for as long as necessary for the purposes we collected it for.

Pele Trust maintains a Retention Schedule based on:

- Legal obligations
- Regulatory guidance (e.g. IRMS Toolkit for Schools)
- Best practice in education and safeguarding

Examples:

- Pupil records - retained until the individual turns 25
- Staff records - usually retained for 6 years after employment ends
- CCTV footage - usually deleted within 30 days unless required for investigation
- Safeguarding records - retained in line with statutory guidance

View our retention schedule here:

 [Retention Schedule September 2025.pdf](#)

7. Who We Share Your Data With

We only share your information where necessary, lawful, and proportionate. Examples include:

- Local authorities - e.g. for safeguarding, SEND, attendance, contractual and financial management purposes
- Social Services
- Other school's, Pupil Referral Units (PRU's) or Education Otherwise at School Centres (EOTAS)
- Specialist teachers and support services such as peripatetic workers or speech and language therapists
- Department for Education (DfE) - e.g. for census and statutory returns
- Ofsted
- Exam boards and assessment bodies - for administering qualifications
- NHS and healthcare professionals - for wellbeing and care support
- Education software and service providers - e.g. for curriculum, reporting, or parental communication and payments
- Survey and research organisations including ONS
- Payroll and pensions providers - for staff administration and to meet contractual obligations
- Law enforcement and courts - where legally required
- Auditors, consultants and relevant professional bodies - for compliance, finance or HR purposes.

- Publicly on our website, social media or other marketing and information media
- Previous and future employers

We do not share information with anyone unless the law and our policies allow us to do so. We maintain appropriate contracts and due diligence checks with all data processors.

8. Children's Privacy

We recognise our responsibility to explain how personal information is used in ways that children understand. Where appropriate, we:

- Use plain language in communications with children
- Avoid intrusive data collection or profiling
- Comply with the Children's Code for online services

Once a child is able to understand their rights over their own data (generally considered to be age 12, but this will be considered on a case-by-case basis), we will need to obtain consent from them if a subject access request is made on their behalf.

9. Your Data Protection Rights

Under UK data protection law, you have the right to:

- Access your personal data
- Rectify inaccuracies
- Erase data (in limited cases)
- Restrict processing
- Object to certain processing
- Data portability (where processing is automated and based on consent or contract)
- Withdraw consent at any time (where relied upon)

In line with the Data (Use and Access) Act 2025:

- We conduct reasonable and proportionate searches for Subject Access Requests (SARs)
- We may pause the response deadline while seeking clarification
- We aim to respond within one calendar month

10. How to Complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details below:

Data Controller: Pele Trust

Data Protection Officer: Claire Leightley

Contact: info@peletrust.org.uk

Website: www.peletrust.org.uk

If you remain unhappy with how we used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>

Appendix 1 Lawful Basis Matrix

Purpose of Processing	Lawful Basis (Article 6)	Special Category Basis (Article 9, if applicable)
Delivering education and curriculum support	Public task	N/A
Monitoring pupil progress and reporting attainment	Public task / Legitimate interests	N/A
Safeguarding, pastoral care and promoting wellbeing	Legal obligation / Public task	Substantial public interest (9(2)(g))
Managing behaviour and discipline	Public task	Substantial public interest (if health/disclosure involved)
Supporting SEND and additional needs provision	Legal obligation / Public task	Health/social care (9(2)(h))
Recording attendance and improving participation	Public task	N/A
Communicating with families about school life	Public task / Legitimate interests	N/A
Organising trips, enrichment and extracurricular activities	Public task / Consent (where optional)	Health (9(2)(h)) / Consent (9(2)(a))
Maintaining standards and resolving complaints or investigations	Legal obligation / Legitimate interests	Substantial public interest (9(2)(g))
Administering staff employment contracts and payroll	Contract / Legal obligation	N/A
Ensuring fair and safe recruitment (e.g. vetting, DBS)	Legal obligation / Contract	Employment law / Substantial public interest

Supporting staff performance management and CPD	Contract / Legitimate interests	N/A
Managing absences and occupational health	Contract / Legal obligation	Health (9(2)(h))
Completing workforce reporting and audits	Legal obligation / Public task	N/A
Effective financial management (e.g. budgeting, salary modelling)	Legitimate interests / Public task	N/A
Meeting legal duties under education/employment/safeguarding law	Legal obligation	Substantial public interest (where special category data is involved)
Ensuring site and system security (e.g. CCTV, access logs)	Legitimate interests / Legal obligation	Substantial public interest / Vital interests
Responding to complaints, concerns or legal claims	Legal obligation / Legitimate interests	Substantial public interest (9(2)(g))
Supporting governance and Trust compliance	Legal obligation / Public task	N/A
Preventing or detecting crime, fraud, or safeguarding risk	Legal obligation / Legitimate interests	Substantial public interest / Vital interests
Marketing and promotional communications including use of photos/videos for publicity	Consent	Explicit consent (9(2)(a))
Use of photos/videos internally (e.g. classroom displays)	Legitimate interests	N/A
Biometric systems (e.g. catering access)	Consent	Explicit consent (9(2)(a))

Document Control

Version number	Date of last review	Changes
3.0	August 2025	Consolidation of 3 previous notices into 1. Inclusion of lawful basis as a matrix. Reflective of June 2025 legislation
2.0	November 2024	Formatting