



Privacy Notice (How we use student information)

You have a legal right to be informed about how our school, and Bohunt Education Trust, uses any personal information that we hold about you. To comply with this, we provide a “privacy notice” to you where we are processing your personal data. This privacy notice explains how we collect, store, process, share, retain and use personal data about pupils at our School, like you.

Our School is a member of Bohunt Education Trust, which is the “data controller” for the purposes of data protection law. For any information about how our School complies with data protection you may contact the School Data Protection Contact or the Bohunt Education Trust Data Protection Officer.

In our School the Data Protection Contact is:

Mr Liam Harris

Tel: 01403 627430

Email: lharris@bohunthorsham.com

The Data Protection Officer for the Bohunt Education Trust is:

SchoolPro TLC

Address: Commercial House, 2 Abbeymead Avenue, Abbeymead, Gloucester, GL4 5UA

Tel: 01452 947633

Email: contact@schoolpro.uk

We collect, hold and process some personal information about you to make sure we can help you learn and look after you at school. For the same reasons, we receive information about you from some other places too –like your parents, other schools, medical or other specialist advisers you or your parents have appointed, the local council and the government.

The categories of student information that we collect, hold, store, retain, process and (subject to the detail below around sharing) share includes, but is not restricted to:

- Personal identifiers and contact details (such as name, unique pupil number and address)
- Safeguarding information (including court orders and other professional involvement and assessments)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences, absence reasons and previous schools attended)
- Special Education Needs information including the needs and ranking
- Behavioural information (such as suspensions or awards and any relevant alternative provision put in place)
- Curricular records, assessment information and attainment records (such as key stage 1 and phonics results, post 16 courses enrolled for and any relevant results)
- Medical and administration (such as doctors information, child health, dental health, allergies,

medication and dietary requirements)

- Attendance at extra-curricular clubs, activities and trips and any information required to be provided to support your participation in these
- Details of any support received, including care packages, plans and support providers
- Modes of travel
- Relevant pastoral and behavioural information (including inclusions, suspensions and other alternative provision put in place)
- Post-16 and 18 destinations and learning information
- Photographs, and other multi media recordings
- CCTV images captured in school
- Information about how you use school computers and other IT and communications systems
- Catering information including biometric data (fingerprints) where needed to access school payment systems.

We may also hold data about you that we have received from other organisations, including other schools and local authorities.

Why we collect and use this data

We collect and use student data for the following purposes:

- to get in touch with you and your parents or carers when we need to
- to support, develop and take pride in teaching and learning in both onsite and alternative settings
- to monitor and report on progress and attainment
- to check how you are doing in exams and work out whether you or your teachers need any extra help
- to provide appropriate safeguarding and pastoral care, including with respect to the provision of alternative settings
- to assess the quality of our services and how well our School and the Trust are doing
- to be sure our computers and other school systems and equipment are used appropriately, legally and safely
- to keep students safe (for example relevant medical details, or emergency contact details or other information)
- to meet statutory duties placed on us by the Department of Education, for data collections;
- to comply with any other statutory duty imposed on us by any other government or local authority, or by law

The lawful basis on which we use this information

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing student information are:

- for the purposes of bullet points 1-7 above, in accordance with the legal basis of Public task: collecting the data is necessary to perform tasks that schools are required to perform as part of their statutory function
- for the purposes of bullet point 8 in accordance with the legal basis of Vital interests: to keep children safe (food allergies, or medical conditions)
- for the purposes of bullet points 9 in accordance with the legal basis of Legal obligation: data collected for DfE census information
 - Section 537A of the Education Act 1996
 - the Education Act 1996 s29(3)
 - the Education (School Performance Information)(England) Regulations 2007

- regulations 5 School Information (England) Regulations 2008
- the Education (Pupil Registration) (England) (Amendment) Regulations 2013
- for the purposes of bullet point 10, in accordance with the legal basis of legal obligation in order to discharge our duties in law

Our basis for using special category data

For 'special category' data (more sensitive personal information), we only collect and use it when we have both a lawful basis, as set out above, and 1 of the following conditions for processing as set out in UK data protection law:

- We have your explicit consent to use your information in a certain way
- We need to use your information under employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The information has already been made obviously public by you
- We need to use it to make or defend against legal claims
- We need to use it for reasons of substantial public interest as defined in legislation
- We need to use it for health or social care purposes, and it's used by, or under the direction of, a professional obliged to confidentiality under law
- We need to use it for public health reasons, and it's used by, or under the direction of, a professional obliged to confidentiality under law
- We need to use it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the use is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made obviously public by you
- We need to use it as part of legal proceedings, to obtain legal advice, or to make or defend against legal claims
- We need to use it for reasons of substantial public interest as defined in legislation

Sometimes we may also use your personal information where you and your parents/carers have given us permission to use it in a certain way.

Where you've agreed that we're allowed to use your information ('given consent'), you may take this back at any time. We'll make this clear when requesting your consent and explain how you'd go about withdrawing consent if you want to.

Collecting student information

We collect student information via Registration forms and Common Transfer File (CTF), also via hard copy files and CPOMs safeguarding transfers.

Student data is essential for our operational use. Whilst the majority of student information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with the data protection

legislation, we will inform you at the point of collection, whether you are required to provide certain student 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.

Most of the data we hold about you will come from you or your parents/carers, but we may also hold data about you from:

- Local councils
- Government departments or agencies
- Police forces, courts or tribunals
- Other schools or trusts
- Department for Education (DfE)

Storing data

We hold student data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please see the [Data Protection Policy](#) and you may also contact the school's Data Protection Contact.

Who we share student information with

We routinely share relevant student information (which we anonymise wherever possible and share solely through secure means) with:

- Bohunt Education Trust (as the legal entity responsible for our students)
- Schools/colleges/employment providers that the students attend after leaving us
- our local authority
- the Department for Education (DfE)
- Our regulators – for example, Ofsted, ESFA
- Our auditors
- Suppliers and service providers
- Police forces, courts, tribunals
- Medical, educational, health, youth support and safeguarding professionals
- Survey and research organisations
- Security organisations
- Charities and voluntary organisations

Transferring data internationally

We may share personal information about you with international third parties (organisations, companies, etc, that are based outside the UK), where different data protection legislation applies.

Where we transfer your personal data to a third-party country or territory, we will follow UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

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 only share personal information where it is necessary to do so: otherwise student information is anonymised. Wherever possible we share such information via secure shared areas or

electronic transfer links only, and do not use our usual email or insecure file transfer areas nor unregistered post or portable devices such as USB sticks.

We share student data with the Department for Education (DfE) on a statutory basis under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013. This data sharing underpins school funding and educational attainment policy and monitoring. Further information is available in Annex 1.

Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you messages by email or text promoting school events, campaigns, charitable causes or services that you might be interested in.

You can take back this consent or 'opt out' of receiving these emails and/or texts at any time by selecting the 'unsubscribe' link at the bottom of any such communication, or by contacting us via your Data Protection Contact.

Use of your personal data in automated decision-making and profiling

We do not currently put pupils' personal data through any automated decision-making or profiling process. This means we do not make decisions about you using only computers, without any human involvement. If this changes in the future, we will update this notice to explain the processing to you, including your right to object to it.

Use of your personal data for filtering and monitoring purposes

While you are in school, we will monitor what material you access on our computers and other IT and communication systems. We do this so that we can:

- Comply with health and safety law and other laws like Keeping Children Safe in Education legislation
- Comply with our policies (e.g. child protection policy, safeguarding policy and acceptable use policy)
- Keep our networks and devices safe from people who aren't allowed to access them, and prevent harmful software from damaging our networks
- To protect your welfare

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

Once our students reach the age of 13, we also pass their 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 507B of the Education Act 1996.

This enables them to provide services as follows:

- youth support services
- careers advisers

A parent or guardian can request that only their child's name, address and date of birth be passed to their local authority or provider of youth support services by informing us. This right is transferred to the child / student once he/she reaches the age 16.

Data is securely transferred to the youth support service via secure mail systems or password protected files and is stored and held for three years from date of last entry.

Students aged 16+

We will also share certain information about students aged 16+ with 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 507B of the Education Act 1996.

This enables them to provide services as follows:

- post-16 education and training providers
- youth support services
- careers advisers

For more information about services for young people, please visit our local authority website.

Data is securely transferred to the youth support service via secure mail systems or password protected files and is stored and held for three years from date of last entry.

The Department for Education (DfE)

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 students with the Department for Education (DfE) either directly or via our local authority for the purpose of those data collections under:

- Section 537A of the Education Act 1996
- The Education Act 1996 s29(3)
- The Education (School Performance Information)(England) Regulations 2007
- Regulation 5 School Information (England) Regulations 2008
- The Education (Pupil Registration) (England) (Amendment) Regulations 2013
- 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 below.

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.

Requesting access to personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for personal information, or be given access to your educational record, please contact the School Data Protection Contact.

You also have the right to:

- to ask us for access to information about you that we hold
- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing

- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

If you have a concern about the way we are collecting or using personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:

- Your right to have all personal data deleted or destroyed doesn't apply when the lawful basis for processing is legal obligation or public task
- Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests
- Right to object to the use of your private data doesn't apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent

Withdrawal of consent and the right to lodge a complaint

We take any complaints about how we collect and use personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concerns about our data processing, please raise this with us in the first instance. You can make a complaint to us at any time by contacting the Data Protection Contact.

Alternatively, you can make a complaint at any time to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

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 December 2025.

Contact

If you would like to discuss anything in this privacy notice, please contact the Bohunt Education Trust Data Protection Officer.

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.

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-user-guide-and-supporting-information>

Sharing by the Department for Education

The law allows the Department for Education 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/dfe-external-data-shares>

How to find out what personal information the Department for Education (DfE) hold about you

Under the terms of the 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 the Department for Education (DfE): <https://www.gov.uk/contact-dfe>