LIMPSFIELD GRANGE SCHOOL
'together we make a difference'

Privacy Notice for Parents, Carers and family members

Limpsfield Grange School is committed to protecting the privacy and security of personal information. This privacy notice describes how we collect and use personal information about students, in accordance with the UK General Data Protection Regulation (UK GDPR), section 537A of the Education Act 1996 and section 83 of the Children Act 1989.

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation ("GDPR") is retained EU law and known as UK GDPR. The UK GDPR operates alongside the Data Protection Act ("DPA") 2018 that relates to processing of personal data, exemptions, powers of the Information Commissioner and enforcement. The Data (Use and Access) Act 2025 further amends both the UK GDPR and DPA 2018 to modernise UK data protection rules and clarify certain rights and obligations. The GDPR continues to apply in the EU.

Who collects this information

Limpsfield Grange is a "data controller" of personal data and gathers and uses certain information about students and parents. This means that we are responsible for deciding how we hold and use personal information about our students and parents.

Under data protection legislation we are required to notify you of the information contained in this privacy notice. This notice does not form part of any contract of employment or other contract to provide services and we may update this notice at any time.

It is important that you read this notice, together with any other policies mentioned within this privacy notice, so that you are aware of how and why we are processing your information, what your rights are under data protection legislation and the procedures we take to protect your personal data.

Data protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

The categories of student information that we collect process, hold and share

We may collect, store and use the following categories of personal information about you:

- Personal information such as name, student number, date of birth, gender and contact information
- Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses
- Characteristics (such as language and free school meal eligibility)
- Attendance details (such as sessions attended, number of absences and reasons for absence)
- Financial details
- Performance and assessment information
- Behavioural information (including exclusions)
- Safeguarding information
- Images of students engaging in school activities, and images captured by the School's CCTV system
- Information about the use of our IT, communications and other systems, and other monitoring information

We may also collect, store and use the following more sensitive types of personal information:

- Information about your race or ethnicity, religious or philosophical beliefs
- Information about your health, including any medical conditions and sickness records
- Special educational needs information

Collecting this information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the UK GDPR, we will inform you whether you are required to provide certain student information to us or if you have a choice in this.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

How and why we use your personal information

We will only use your personal information when the law allows us to do so. Most commonly, we will hold student data and use it for:

- Student selection (and to confirm the identity of prospective students and their parents)
- Providing education services and extra-curricular activities to students, and monitoring students' progress and educational needs
- Informing decisions such as the funding of schools
- Assessing performance and to set targets for schools;
- Safeguarding students' welfare and providing appropriate pastoral (and where necessary medical) care
- Supporting teaching and learning
- Giving and receiving information and references about past, current and prospective students, and to provide references to potential employers of past students
- Managing internal policy and procedure
- Enabling students to take part in assessments, to publish the results of examinations and to record student achievements
- To carry out statistical analysis for diversity purposes
- Legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care
- Enabling relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate
- Monitoring use of the school's IT and communications systems in accordance with the school's IT security policy
- Making use of photographic images of students in school publications, on the school website and on social media channels
- Security purposes, including CCTV
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school
- To provide support to students after they leave school

The lawful bases on which we use this information

We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Consent: the individual has given clear consent to process their personal data for a specific purpose
- Contract: the processing is necessary for a contract with the individual
- Legal obligation: the processing is necessary to comply with the law (not including contractual obligations)
- Vital interests: the processing is necessary to protect someone's life
- Public task: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law
- The Education Act 1996: for Departmental Censuses 3 times a year. More information can be found at: https://www.gov.uk/education/data-collection-and-censuses-for-schools.

We mainly use students' personal data to comply with legal obligations and to perform tasks carried out in the public interest. Please note that we may process information without knowledge or consent, where this is required or permitted by law.

How we use particularly sensitive personal information

Special categories of particularly sensitive personal information, such as information about your health, racial or ethnic origin, sexual orientation, or biometrics (as defined under UK GDPR as "special category data") require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information as set out in our Data Protection Policy. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent
- Where we need to carry out our legal obligations in line with our data protection policy
- For reasons of substantial public interest, such as for equal opportunities monitoring
- Where necessary to establish, exercise or defend legal claims
- Where necessary to protect your vital interests (or those of another person) and you are unable to consent

Sharing data

We may need to share your data with third parties where it is necessary. There are strict controls on who can see your information. We will not share your data if you have advised us that you do not want it shared unless it's the only way we can make sure you stay safe and healthy or we are legally required to do so.

We share student information with:

- the Department for Education ("DfE") - on a statutory basis under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013
- Ofsted
- Youth support services – under section 507B of the Education Act 1996, to enable them to provide information regarding training and careers as part of the education or training of 13-19 year olds;
- Other Schools that students have attended/will attend
- NHS
- Welfare services (such as social services)
- Law enforcement officials such as police, HMRC
- Local Authority Designated Officer
- Professional advisors such as lawyers and consultants
- Support services (including insurance, IT support, information security)
- The Local Authority

- Providers of learning software

The DfE request regular data sharing on student attendance to help support those vulnerable and to assist with intervention strategies. Further information on how the DfE collects this data will be made available on the school website.

Information will be provided to those agencies securely or anonymised where possible. The recipient of the information will be bound by confidentiality obligations; we require them to respect the security of your data and to treat it in accordance with the law.

Youth Support Services
Students aged 13+

Once our students reach the age of 13, we also pass student information to our 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.

We must provide the student's name, the parent name(s) and any further information relevant to the support services role. This enables them to provide youth support and careers advisers' services.

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

Storing student data
Limpsfield Grange School keeps information about students on computer systems and also on paper.
Except as required by law, Limpsfield Grange only retains information about students for as long as necessary in accordance with timeframes imposed by law and our internal policy.

If you require further information about our retention periods, please refer to our Data Retention policy on the school website www.limpsfieldgrange.co.uk

Retention periods
Except as otherwise permitted or required by applicable law or regulation, the school only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

Information about how we retain information can be found in our Data Retention policy. This document can be found on our school website.

Security
We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

You can find further details of our security procedures within our Data Breach Policy and our Information Security Policy, copies of which can be requested from the school office.

It is important that the personal information we hold about you is accurate and current. Please keep us information if yours or your child's personal information changes while your child attends our school.

The National Pupil Database (NPD)

The NPD is owned and managed by the DfE and contains information about students in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the DfE. 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.

We are required by law, to provide information about our students to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information about Individual Pupils) (England) Regulations 2013.

To find out more about the NPD, go to https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information

The Department for Education may share information about our students from the NPD with third parties who promote the education or well-being of children in England by:

- Conducting research or analysis
- Producing statistics
- Providing information, advice or guidance

The DfE has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether the DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- Who is requesting the data
- The purpose for which it is required
- The level and sensitivity of data requested; and
- The arrangements in place to store and handle the data.

To be granted access to student information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit: https://www.gov.uk/data-protection-how-we-collect-and-share-research-data. For information about which organisations the department has provided student information, (and for which project), please visit the following website: https://www.gov.uk/government/publications/national-pupil-database-requests-received. To contact the DfE: https://www.gov.uk/contact-dfe

Your Rights of Access, Correction, Erasure and Restriction

Under certain circumstances, by law you have the right to:

- Access your personal information (commonly known as a "subject access request"). This allows you to receive a copy of the personal information we hold about you and to check we are lawfully processing it. We will provide the information for a charge of £50 to cover staff time and administrative costs. If your request for access is clearly unfounded or excessive, we may charge a further reasonable fee or we may refuse to comply with the request.

- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.
- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it.
- Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
- To object to processing in certain circumstances (for example for direct marketing purposes).
- To transfer your personal information to another party.

If you want to exercise any of the above rights, please contact the School Business Manager in writing.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

Right to withdraw consent

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the School Business Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Contact

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with the School Business Manager in the first instance. We will acknowledge receipt of your complaint within 30 working days, and we will investigate and respond without undue delay. Further information about the way we handle data protection complaints can be found in our Data Protection Policy, available on our school website.

We have appointed a Data Protection Officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by the School Business Manager, then you can contact the DPO on the details below:

Data Protection Officer:	Judicium Consulting Limited
Address:	5th Floor, 98 Theobalds Road, London, WC1X 8WB
Email:	dataservices@judicium.com
Web:	www.judiciumeducation.co.uk

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues: https://ico.org.uk/concerns.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.