

## **Privacy Notice**

### **(How we use pupil information)**

**September 2026  
V14**

We, Hurst Hill Primary School, Gig Mill Primary School, Lutley Primary School, Lapal Primary School, Priory Primary School, Woodside Primary School and Nursery and Withymoor Primary School are trading on behalf of Hales Valley Trust; the MAT is the data controller for the purposes of Data Protection Law.

### **Why do we collect and use pupil information?**

We collect and use pupil 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.

Section 40(2)(a) of the Childcare Act 2006 - early years foundation stage and Section 87 of the Education Act 2002 - key stage 1 and key stage 2, enables primary age education settings to collect information for the assessing and reporting of the national curriculum

There are various versions of the Education Act both preceding and following 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 the pupil information, for the following purposes:**

- To support pupil learning.
- To monitor and report on pupil progress.
- To provide appropriate pastoral care.
- To assess the quality of our services.
- To comply with the law regarding data sharing.
- To keep children safe. (Food allergies, or emergency contact details.)
- To meet the statutory duties placed upon us for DfE data collections.

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

- Personal information (such as name, unique pupil number, contact details and address, relevant medical information.)
- Characteristics (such as ethnicity, language, gender, religion, date of birth, free school meal eligibility, special educational needs.)
- 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, national curriculum assessment results, any exclusion information, where they go after they leave us.)
- Assessment and attainment information (such as EYFS, Key Stage or internal academic assessment information, post 16 courses enrolled for and any relevant results.)
- Behavioural information (such as exclusions and any relevant alternative provision put in place)

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 pupil information**

We collect pupil information via registration forms at the start of the school year, Common Transfer File (CTF) or a secure file transfer from previous school.

Whilst the majority of pupil 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; 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 educational setting and may also receive information from the Local Authority (LA) and the DfE.

## Storing pupil data

The information we collect, use and store about pupils and their parents/carers is retained on our computer systems and in paper files, either until it is updated/superseded or until the pupil leaves the school where it will be passed on to the receiving school in accordance with the Education (Pupil 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. 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 pupil information with?

- Relevant staff within the school
- Schools that the pupils attend after leaving us
- Our local authority (Including Dudley Performing Arts, Ed Psycs, Speech and Language Therapist)
- Dudley Performing Arts (DPA) – DPA work with schools to ensure the best possible opportunities for children and young people. DPA help students to develop skills and take part in performance groups. DPA offer a wide range of activities for whole classes, small groups and individuals. The school share limited personal data with DPA
- Education Psychologists – The school uses educational and child psychology service to optimise learning, development and emotional well-being of children and young people in the school. The school share limited personal data with DPA.
- Speech and Language Therapists – The school uses Speech and Language Therapists to identify and support children and young people with a range of communication and eating/drinking/swallowing difficulties. These might include:- difficulty understanding spoken language, being late in starting to talk, difficulty putting sentences together, unclear speech, stammering/stuttering, voice problems, etc. The school share limited personal data with DPA.
- The Department for Education (DfE)
- NHS/Health Services/School Nurse provides preventive and screening services, health education and assistance with decision-making about health, and immunization against preventable diseases.
- NHS Test and Trace and Public Health England a central part of the government's (COVID- 19) recovery strategy
- Bromcom (Bromcom is a cloud-based school Information management system. The system records assessments, attendance, behaviour, student and staff data across individuals, groups, classes and years)
- MCAS – My Child at School (Bromcom) - is the app used to communicate between the school and the parent. The personal data used is name of the parent/guardian and their contact details. These are obtained from the school's management information system. To access the app the parent/guardian is invited to download the MCAS app.
- Inventory (As part of the school's visitor management system we will ask for your name, who you work for, and car registration. We will also record when you arrive and when you leave the school. This information is to ensure that we meet our duty of care under health and safety and the safeguarding of our children. Our data retention period for this information is current year + 6 years. Please note that we will also take a photograph of you, and this will be retained on our visitor management system in order for us to use again should you visit us again. If you would prefer your photograph to be removed from the database once your visit is complete, please advise either our receptionist or your host)
- DGfL (Dudley Grid for Learning is a partnership between Dudley educational establishments, Dudley Metropolitan Borough Council and RM Education. DGfL provides our school with a fully managed ICT service)
- SPTO (School Pupil Tracker Online is an online assessment tracking system – it can easily and quickly find children who are not making enough progress in school, show you who has made good progress and highlight who might need additional support)
- Education City (education software/learning resources)
- E-Safe Monitoring Service (e-Safe is a fully outsourced, monitoring and incident review service that

helps monitor student, staff and guest use of a school's IT facilities to identify early warning of safeguarding risk)

- Groupcall Messenger-Communication system
  - Just2easy (learning resource) Creativity tools, apps and games for Maths, English, Computing and cross curricular creative activities in a completely personalised learning experience. Available via RM Unify.
  - Mathletics-Online platform for maths, interactive activities, games and challenges.
  - MediaCore Library
  - Micro Librarian Systems (a self-service library management system promoting reading and information culture, motivating independent readers and learners for life whilst developing ICT skills).
  - Microsoft Online Services – Microsoft Office 365 (Microsoft Office 365 provides powerful online cloud services that enable collaboration, security and compliance)
  - RM Education (RM Education specialises in providing information technology products and services to educational organisations and establishments)
  - RM Unify **Unify** (RM Unify is a cloud based educational platform which allows teachers and students to access resources on the internet easily. RM Unify makes this easier by allowing you to setup one username and password to remember for all of these services)
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- Times Table Rock Stars (Times Tables Rock Stars is a carefully sequenced programme of daily times tables practice aimed at schools)
  - CPOMS (safeguarding) (CPOMS is the software application for monitoring child protection, safeguarding and a whole range of pastoral and welfare issues. CPOMS is an intuitive system to help with the management and recording of child protection, behavioural issues, bullying, special educational needs and domestic issues. Using CPOMS, schools can ensure that students are safe and fully supported, whilst school staff can focus on teaching and providing support)
  - GL Assessment (Pass Survey Pupil Attitude to Self and School PHSE) Psychometric assessment specifically designed to spot attitudinal or emotional issues in children before they impact on school performance
  - SHEU (School Survey- (School Survey) Health and Wellbeing Boards, Primary Care Trusts, Community Health Partnerships (CHP) and Local Health Boards (LHB) use our services to provide base-line data about the health-related behaviour of young people in their area
  - IRIS Connect CPD for Teaching Staff- Dual view technology and new high-quality audio recording ensures you capture every interaction in the classroom. All classroom videos are automatically uploaded directly to secure IRIS account in the IRIS Connect platform, ready to reflect on or share later for CPD. All accounts are password protected/ Staff are unable to download videos.
  - IRIS connect also now includes AI. AI will be used for analysis of professional development. Only transcriptions are sent to the AI service provider, not video or audio.  
No data is stored by the AI service provided once the output is complete. IRIS Connect take the view that given it is already storing video, audio and associated data with professional development with the addition of a transcription of the audio they state that this does not affect the way data is being and intended to be processed going forward. IRIS Connect suggest that the lawful basis can remain as public task as teacher professional development is a statutory obligation for schools. YourIG would agree with this view.
- Espresso Coding (should the school be subscribed)
  - Espresso Primary (learning resource) Resources are curated into modules supporting specific curriculum objectives. Module guides provide teachers with context for the resources with suggested ideas for integrating into lessons
  - Purple Mash (Purple Mash is a cross-curricular website for nursery and primary school children. It enables children to explore and enhance their knowledge in a fun and creative way)
  - Papercut (PaperCut is a print and copy output management software solution for our Multi-Functional Devices)
  - Tapestry (An online journal recording all the learning and fun of children's early years' education. Tapestry allows staff to capture children's learning using iPod and iPad whilst in Nursery and Reception.)
  - Pixton Comic Maker (A comic and storyboard creator for children. Children can make their own online

comic book story. Available via RM Unify

- PSF – Accounting system (Accounting, purchasing and reporting management software)
- DBSB – online Training System (The Dudley Safeguarding Children Board is responsible for making sure individuals and organisations represented on the board such as the police, Fire Service, NHS, Dudley Council, voluntary sector organisations, the ambulance service and schools etc. safeguard and promote the welfare of children and young people in Dudley)
- School Suppliers (i.e. Tempest) / Trading Services)
- Spag.com (Spelling, Punctuation and Grammar – Educational software and learning resources)
- Bug club/Maths Factor (Active Learn – Educational software and learning resources)
- Rising Stars (educational software, learning resources)
- Hamilton Trust
- West Bromwich Albion FC (A sports coaching company that delivers activities during curriculum and extra curriculum time. <https://www.wba.co.uk/foundation/about-us/our-policies/data-protection-policy/>)
- Evolve(online risk assessment for educational visits)
- Bibs and Balls (Sports coaching)
- **Active Learn** formally known as Bug club/Maths Factor (A whole school reading programme that joins books with an online reading world to teach children to read. Encourages independent reading at home.)
- **Scratch** (a programming language code. Helps young people to think creatively, reason systematically and work collaboratively.)
- Living Streets. org.uk (the year round walk to school challenge. Pupils record how they get to school on the online WOW travel tracker.)
- Vaccination UK Ltd ( administer the flu vaccine to pupils)
- Century (A learning resource) teaching and learning platform for schools, colleges and universities uses artificial intelligence to learn how every brain learns. Personalised online learning.
- Google G Suite for Education (learning resource) An integrated suite of secure, cloud-native collaboration and productivity apps powered by Google AI.
- Scratch.org Prodigy Maths Educational software and learning resources – an online resource for children to learn about coding, programming and creating their own animations and interactive stories to share.
- Code.org Educational software and learning resources to teach pupils how to create apps, animations and games.
- Spelling Frame Educational software and learning resources containing all the words from the National Curriculum spelling from Y2 to Y6, children can choose to practise a set of words, play a word game or take a spelling test. The teacher can modify a set of words and monitor progress
- Maths Frame Educational software and learning resources. Children learn whilst playing maths games designed around the National Curriculum, as well as doing worksheets and assessments.
- Topmarks.co.uk Educational software and learning resources for the classroom to support the National Curriculum, providing subject games and whiteboard resources.
- Flashmaths Educational software and learning resources providing a growing collection of 67 maths starters, activities and games to aid the teaching of maths lessons in and out of the classroom.
- Mathshot Educational software and learning resources, Math Shot is a maths learning game with fun and engaging gameplay. Practice addition, subtraction, division and multiplication of numbers within 100 in a new and fun way. The built-in handwriting recognition allows you to draw answers directly on the screen. The game's difficulty dynamically adapts to the player's skills and makes the game suitable for all ages.
- Assembly Analytics- (Online dashboard: combines key MIS data with standardised assessment and financial data to give reliable benchmarks for our schools and Hales Valley Trust.)
- Renaissance- (app used for accelerated reading tool for monitoring and managing independent reading practice)
- Power Maths (Online learning app for children)
- Phonics Tracker (Online assessment tracking system for tracking phonics progress)
- Wonde (Winter Food Voucher Scheme – COVID and reporting attendance to the DFE)

- Spelling Shed (educational software, learning resources)
- Reading Planet (educational software, learning resources)
- Mark (educational software, learning resources)
- Zoom (Video communication system)
- MOTE (Software app that can be used in Google classrooms to provide voice notes apps to enable Teachers to provide feedback to pupils)
- Loom (Software which enables teaching staff to record lessons for children to access in their own time)
- School Life (recording Covid absences for local authority and public health)
- RM safety Net (online filtering system)
- Smoothwall Monitoring (online monitoring system)
- Caterlink – School catering provider
- RPA (Davies Group) - Risk Protection Assurance - (Liability Insurance provider)
- Scriba - Scriba is an intelligent clerking tool which uses AI to write minutes of meetings, capturing decisions from a committee or recording actions from and tracking actions. It produces minutes in tailored formats that are designed for the specific requirements of different boards and meetings within the education sector, for example by capturing challenge and accountability.
- Canva- Canva for Education (and all content and media incorporated therein) for educational purposes may be used by schools. In the context of schools this can include using Canva as a platform to produce promotional material, newsletters, school memorabilia for school proms, leavers books, etc.
- Trellis is a hosted system which means that all updates, maintenance and management can be performed in a central location by Trellis Education Limited.
- Microsoft 365 Education including Copilot- Microsoft 365 Education is a productivity suite that provides a suite of applications that can assist with students learning and collaboration. Microsoft 365 builds on top of Office 365 apps such as Word, Excel, PowerPoint, and Outlook and provides enhanced management, security, and compliance tools. In addition, an artificial intelligence tool 'Copilot' is included as part of the M365 Education suite of apps and complements the above tools.

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 Trust will undertake a data protection impact assessment such as MS copilot stated above.

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.

The MASH is the single point of contact for safeguarding concerns, and 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 pupil/parent/carers 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'.

- CPOMS

- DSL in relevant MAT
- Police Authority
- Children's Services
- Department For Education
- Local Authority
- Governors for Multi Academy Trust

### **Why do we share pupil information?**

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

We share pupils' 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 pupils with the (DfE) under regulation 5 of The Education (Information about Individual Pupils) (England) Regulations 2013.

### **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.

### **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 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.

### **CCTV**

This section of the privacy notice relates to our CCTV System, including, but not limited to, where it has been installed on the outside of the buildings of Woodside Primary School and Hurst Hill Primary School.

### **What personal information does this service use?**

The CCTV system captures images of people and vehicles in and around where a camera is located. Where fixed CCTV cameras are operating, there will be signs clearly displayed. Images captured by CCTV will not be kept for longer than 30 days. However, on occasions there may be a need to keep images for longer, for example where a crime is being investigated.

### **What is this personal information used for?**

We use this personal data for the following reasons:

- a) To increase personal safety of pupils, staff and visitors, and reduce the fear of crime.
- b) To protect the school buildings and their assets.
- c) To support the Police in a bid to deter and detect crime.
- d) To assist in identifying, apprehending and potentially prosecuting offenders.
- e) To protect members of the public and private property.
- f) To assist in managing the school.

### **What is the lawful basis we are relying on?**

We collect and use this information to ensure the school can undertake its remit to educate children ensuring personal safety of pupils, staff and visitors, protecting school buildings and its assets and to assist in managing the school (Article 6(1)(e) of the General Data Protection Regulation). The school will use the 'Passport to Compliance', issued by the Surveillance Camera Commissioner to ensure that the surveillance camera system complies with the Guiding Principles set out in the Surveillance Camera Code of Practice published by the Home Office as a requirement of the Protection of Freedoms Act 2012.

### **Where has your personal information come from?**

The images are captured because you are present in the area which is covered by the CCTV system.

### **Who will we share this personal information with?**

Your personal data is shared securely with the following, where it is both necessary and appropriate to do so:

- Relevant staff within the school.
- Our local authority.
- The Police.

### **Requesting access to your personal data**

Under data protection legislation, parents and pupils 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 the applicable school office or Central Office (Hales Valley Multi Academy Trust C/O Woodside Primary School, Highgate Road, Dudley DY2 0SN.)

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.

## **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 **Central Office – R Dean** ([info@halesvalleytrust.org.uk](mailto:info@halesvalleytrust.org.uk))

## **Data Use and Access Act 2025 (DUAA)**

Under the Data Use and Access Act 2025 (DUAA), Complaints about data protection matters are handled under our **data protection policy** and in accordance with relevant guidance from the Information Commissioner’s Office (ICO). If you have serious concerns, you may wish to contact the ICO directly, but the ICO will usually expect you to have raised your concerns with our Data Protection Officer in the first instance.

If you have a complaint, please refer to the Data Protection Policy available on the Hales Valley Trust website – [Trust Policies](#) page.

## **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**

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, 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>

To contact DfE: <https://www.gov.uk/contact-dfe>

### **How to find out what personal information 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 DfE: <https://www.gov.uk/contact-dfe>

### **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 September 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](mailto:YourIGDPOService@dudley.gov.uk)**

**Tel: 01384 815607**