



Privacy notice for parents and carers – use of your child’s personal data

Approved by:	Paula Tucker	Date: 1/9/26
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1. Introduction

Under UK data protection law, individuals have a right to be informed about how our school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about pupils at our school.

This is ReFocus's privacy notice for parents and carers. It explains how we use a pupil's personal data and how a parent or carer may exercise the pupil's rights on their behalf where appropriate.

Data protection rights belong to the pupil. There is no fixed age in England at which a pupil must exercise those rights independently. ReFocus will consider each pupil's understanding, maturity, circumstances and best interests. Where a pupil is competent to act, we will usually deal directly with them or with a parent or carer whom they authorise; otherwise, a person with parental responsibility may usually act for them where this is in their best interests.

ReFocus Independent School is the data controller where it determines how and why personal data is processed. The proprietor/owners retain legal accountability.

The Headteacher manages the school's data-protection arrangements and acts as School Data Protection Lead.

The governing board provides support and oversight.

Telephone: 01933 391660.

Email:enquiries@refocus.school.

2. The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about your child includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Exclusion information
- Attendance information
- Safeguarding information

- Details of any support received, including care packages, plans and support providers
- Information about your child's use of our information and communications systems, equipment and facilities (e.g. school computers), together with photographs and CCTV images captured in school

We may also collect, use, store and share (when appropriate) information about your child that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Information about any medical conditions we need to be aware of, including physical and mental health
- Information about characteristics such as ethnic background, health or disability, and any other special-category information that is necessary to support, educate or safeguard your child

We may also hold data about your child received from you, the pupil, their home or commissioning school, a previous school, a local authority, health or social-care services, examination bodies, government agencies, the police or other organisations where appropriate.

3. Why we use this data

We use the data listed above to:

1. Support pupil learning
2. Monitor and report on pupil progress
3. Provide appropriate pastoral care
4. Protect pupil welfare
5. Assess the quality of our services
6. Administer admissions waiting lists
7. Carry out research
8. Comply with the law regarding data sharing
9. Make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely

3.1 Use of your child's personal data for filtering and monitoring purposes

While your child is in our school, we may monitor their use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations
- Comply with our policies (e.g. child protection policy, IT acceptable use policy) and our legal obligations
- Keep our networks and devices safe from unauthorised access, prevent malicious software from harming them, and protect your child's welfare

4. Our lawful basis for using this data

ReFocus is an independent school that provides alternative provision for pupils commissioned by maintained schools, academies and local authorities. The lawful basis used depends on the particular purpose and circumstances of the processing.

Our principal lawful bases may include legal obligation; public task where ReFocus itself is carrying out a task in the public interest with a clear basis in law; legitimate interests in providing, administering and safeguarding education where those interests are not overridden by the pupil's rights; contract where applicable; vital interests; and consent for genuinely optional uses such as marketing or selected images. Information may also be processed and shared as necessary to support the duties and commissioning

arrangements of a pupil's home school, academy or local authority, using an appropriate lawful basis. ReFocus records the applicable basis for its processing activities.

Where you have provided us with consent to use your child's data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

4.1 Our basis for using special category data

For special-category data, ReFocus will identify both an Article 6 lawful basis and an applicable Article 9 condition. Where required, it will also identify and document the relevant condition under Schedule 1 of the Data Protection Act 2018. These conditions may include explicit consent, vital interests, legal claims, health or social care, or substantial public interest such as safeguarding and equality of opportunity.

For criminal-offence data, ReFocus will identify an Article 6 lawful basis and the specific legal authority or condition required by Article 10 of the UK GDPR and the Data Protection Act 2018. The basis and safeguards used will be recorded; consent will not be treated as sufficient on its own unless the legal requirements are met

5. Collecting this data

While the majority of information we collect about your child is mandatory, there is some information that can be provided voluntarily.

Whenever we seek information from you, we make clear whether it is mandatory and the possible consequences of not providing it, or whether it is voluntary. Most of the data we hold about your child will come from you, the pupil, or their home or commissioning school. We may also receive information from:

- Local authorities and previous education settings
- Government departments, agencies, examination bodies, and health or social-care services
- Police forces, courts or tribunals

6. How we store this data

We keep personal information about your child while they attend ReFocus and, where necessary, after their placement ends. Retention periods vary according to the type of record, its purpose and any legal, regulatory, safeguarding, contractual or operational requirement.

We follow a Records Retention Schedule that sets out the retention period for each category of information. Further information about a particular record can be requested from the School Data Protection Lead.

We have put in place appropriate security measures to prevent your child's personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your child's personal data securely when we no longer need it.

7. Who we share data with

We share information about your child only where there is an appropriate lawful basis and the sharing is necessary, proportionate and consistent with data-protection and safeguarding requirements. Consent is not required where another lawful basis applies.

Where it is legally required or necessary (and it complies with UK data protection law), we may share personal information about your child with:

- The pupil's home or commissioning school, academy or local authority, including North Northamptonshire Council or West Northamptonshire Council where relevant
- Government departments or agencies, where applicable
- Youth support, education, careers and alternative-provision services
- Our regulator, Ofsted
- Examination and awarding bodies, financial organisations and insurers
- Our auditors
- Survey and research organisations
- Health authorities
- Security, IT, management-information-system and cloud-service providers
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

Where a service provider processes personal data outside the UK, ReFocus will ensure that an appropriate transfer mechanism and safeguards are in place, where required by UK data-protection law.

National Pupil Database

Depending on the pupil's registration and commissioning arrangements, information may be supplied by ReFocus, the pupil's home school or the relevant local authority to the Department for Education through an applicable statutory collection, such as the school census or alternative provision census.

Some of this information is then stored in the [National Pupil Database](#) (NPD), which is owned and managed by the Department for Education and provides evidence on school performance to inform research.

The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The Department for Education may share information from the NPD with third parties, such as other organisations which promote children's education or wellbeing in England. These third parties must agree to strict terms and conditions about how they will use the data.

Further information about the National Pupil Database and how the Department for Education uses pupil data is available on GOV.UK. [how it collects and shares personal data](#).

You can also [contact the Department for Education](#) with any further questions about the NPD.

8. Your rights

8.1 How to access personal information that we hold about your child

You have a right to make a 'subject access request' to gain access to personal information that we hold about your child.

If you make a subject access request, and if we do hold information about your child, we will (subject to any exemptions that apply):

- Give you a description of it

- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your child's personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

Where a pupil is competent to understand and exercise their data-protection rights, ReFocus will usually respond directly to them. A parent or carer may act with the pupil's authority, or where the pupil is not competent to act and it is appropriate and in their best interests. ReFocus may ask for evidence of identity and parental responsibility.

8.2 Requests for access to your child's educational record

To make a request, please contact the School Data Protection Lead, Paula Tucker.

As an independent school, ReFocus is not subject to the same automatic parental right of access to the educational record that applies in maintained schools. ReFocus nevertheless chooses to consider and provide appropriate access, subject to data-protection law, safeguarding, confidentiality, third-party information and any applicable exemptions.

8.3 Your other rights regarding your child's data

Under UK data-protection law, pupils have rights regarding how their personal data is used and kept safe. The availability of a particular right depends on the circumstances and the lawful basis used. These rights may include the right to:

- Object to our use of your child's personal data
- Prevent your child's data being used to send direct marketing
- Object to and challenge the use of your child's personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about your child deleted or destroyed, or restrict its processing

- Withdraw consent where it is the lawful basis for a particular use of personal data
- Be notified of a personal-data breach where the law requires this
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

Where a pupil is competent to understand and exercise their data-protection rights, ReFocus will usually respond directly to them. A parent or carer may act with the pupil's authority, or where the pupil is not competent to act and it is appropriate and in their best interests.

9. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or you have another concern about our data processing, please raise it with the school in the first instance so that ReFocus can investigate and respond.

You also have the right to make a complaint 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

10. Contact us

If you have any questions or concerns, wish to exercise a data-protection right, or would like more information about this notice, please contact the School Data Protection Lead: Paula Tucker, Headteacher, ReFocus Independent School, 4 Knox Road, Wellingborough, Northamptonshire, NN8 1HW. Telephone: 01933 391660. Email: paula@refocus.school.