Polaris School Privacy Notice
For Pupils, Parents, Carers and Families

Introduction

At Polaris School, we are committed to protecting the privacy and security of the personal information entrusted to us.

As a specialist educational setting, we collect and use information about pupils and their families to provide high-quality education, safeguarding, therapeutic support, pastoral care and other services necessary to support children and young people.

We understand that privacy is important. This notice explains what information we collect, why we collect it, how we use it, who we share it with and the rights that individuals have under data protection legislation.

Polaris School processes personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and relevant education legislation.

Who We Are

Polaris School is the Data Controller for the personal information we process about pupils, parents, carers, staff, visitors and others connected with the school.

This means that the school is responsible for deciding how personal information is collected, used, stored and shared and for ensuring it is kept secure and in accordance with UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. These laws are designed to ensure that personal information is handled fairly, securely and only for legitimate purposes.

Questions about this Privacy Notice, or requests regarding personal information, should be directed to the Head Teacher in the first instance and to the Data Protection Officer

Email: **DPO@polariscommunity.co.uk**

Why We Process Personal Information

To provide education and support each child properly, we need information that allows us to understand their needs, monitor their progress, keep them safe and communicate effectively with their families.

At Polaris School, personal information helps us to:

- Deliver education and monitor progress.
- Meet the individual needs of every pupil.
- Provide specialist and therapeutic support.
- Keep children safe and fulfil safeguarding responsibilities.
- Monitor attendance and engagement.
- Support behaviour, wellbeing and personal development.
- Communicate effectively with parents and carers.
- Arrange educational visits, examinations and activities.
- Meet legal and regulatory obligations.
- Improve the quality of education and support provided.

This information is essential to enabling us to provide appropriate education, care and safeguarding support.

Information We Collect About Pupils

The type of information we collect will vary depending on a pupil's age, needs and circumstances. We only collect information that is relevant to supporting the pupil and fulfilling our responsibilities as a school. This may include, but is not limited to:

Pupil and Contact Information

This information helps the school to identify pupils accurately and maintain their educational records. Information collected can include: full name, preferred name, date of birth, home address, Unique Pupil Number (UPN), gender, photographs for identification purposes, contact details, emergency contact information

Educational Information

This information helps to support learning and educational progress. This allows staff to tailor learning, identify strengths and provide appropriate support where additional needs are identified. These records may include: admission information, curriculum records, assessment outcomes, progress data, examination results, individual learning plans, annual review information, reports to parents, educational interventions,

Attendance Information

Schools have a legal responsibility to monitor attendance and punctuality. It also helps us identify when pupils may need additional support and allows us to work with families

to improve educational outcomes. These records may include: daily attendance records, absence information, punctuality records, leave requests, attendance concerns, intervention records,

Attendance information helps us identify barriers to learning and ensures that children receive their entitlement to education.

Behaviour, Wellbeing and Pastoral Records

This information enables the school to support the welfare of pupils, maintain a safe learning environment and identify any patterns or concerns that may require additional intervention. These records may include: behaviour incidents, positive achievements, support plans, risk assessments, pastoral interventions, reintegration plans, exclusion information, wellbeing observations

SEND and Specialist Support Information

As a specialist educational provider, Polaris School holds detailed information regarding a pupil's additional educational needs. This information is essential for ensuring that pupils receive the support and provision they require. These records may include: Education, Health and Care Plans (EHCPs), professional assessments, educational psychology reports, speech and language reports, occupational therapy reports, learning support recommendations, annual review documentation

Health and Medical Information

We may process health-related information where necessary to protect a child's welfare and support their education. These records may include: medical conditions, allergies prescribed medication, healthcare plans, mental health support needs, dietary requirements, accessibility requirements, accident and injury records,

These records are kept securely and access is restricted to authorised staff who need the information to carry out their responsibilities and to support the pupil safely.

Safeguarding Information

Safeguarding is one of the school's most important responsibilities and where necessary we may create and maintain safeguarding records relating to: child protection concerns, welfare concerns, multi-agency safeguarding referrals, social care involvement, court orders, early help interventions, risk assessments, professional advice.

These records are kept securely and access is restricted to authorised staff who need the information to carry out their responsibilities and to support the pupil.

Where required, safeguarding information may be shared with appropriate agencies and third parties in accordance with safeguarding legislation and statutory guidance. The protection of children will always take precedence where concerns about welfare or safety arise.

Information About Parents and Carers

To support pupils effectively, we also collect and maintain information about parents, carers, and family members. This information helps us communicate with families, understand who has parental responsibility, comply with legal requirements, and ensure that decisions about a child's education, welfare, and wellbeing are made appropriately.

The information we hold may include names, home and correspondence addresses, telephone numbers, email addresses, relationship details, parental responsibility information, court orders or legal restrictions, preferred methods of communication, records of correspondence with the school, and other information necessary to support the pupil and maintain effective engagement with their family.

Where Information Comes From

Most information is provided directly by parents, carers and pupils. We may also receive information from other organisations involved in supporting the pupil, including: previous schools, Local Authorities, Department for Education, NHS services, General Practitioners, Educational Psychologists, Speech and Language Therapists, Occupational Therapists, Social Care services, alternative providers, Examination boards.

Receiving information from these sources helps ensure continuity of education, support and safeguarding.

Who We Share Information With

Sometimes we need to share information with other organisations in order to educate, support or safeguard pupils, or because the law requires us to do so. Depending on individual circumstances, information may be shared with:

- **Local Authorities** - have statutory responsibilities relating to education, attendance, admissions, SEND provision and safeguarding. Sharing information helps ensure pupils receive the support they are entitled to.
- **Health Professionals** - we may work closely with NHS services, doctors, therapists and other healthcare professionals to support a child's health and wellbeing needs.
- **SEND and Specialist Services** - information may be shared with Educational Psychologists, Speech and Language Therapists, Occupational Therapists and other specialists where this helps us support a pupil's development.
- **Safeguarding Agencies** - where there are concerns about a child's welfare, information may need to be shared with Children's Social Care, the Police or other safeguarding organisations.
- **The Department for Education (DfE)** - schools are legally required to provide certain information to the Department for Education through national data collections such as the School Census.

- **Examination Boards** - where pupils complete qualifications or assessments, relevant information may be shared with awarding organisations.
- **Regulators and Inspectors –** such as Ofsted and other regulatory bodies
- **Service Providers -** we use carefully selected providers to support services such as digital platforms, school management systems, communication platforms, learning platforms, IT systems and cloud storage.

Information is shared only where there is a legitimate and lawful reason to do so. Whenever possible, only the minimum necessary information will be disclosed.

Lawful Basis For Processing Personal Information

Data protection law requires schools to have a valid legal reason, known as a *lawful basis*, for collecting and using personal information. In most cases, Polaris School uses personal information because it is necessary to educate and support pupils, safeguard their welfare, and fulfil our legal responsibilities as a school.

Because schools have these legal and public duties, we do not usually ask for consent to process the information needed to provide education and keep children safe. However, where consent is required for a specific activity, we will explain this clearly and give you a choice.

Below are some examples of the legal bases we rely on when processing personal information (this list is not exhaustive).

Personal Data (Article 6 UK GDPR)

Activity	Lawful Basis
Delivering education, maintaining pupil records, administration of examinations & qualifications	Public Task
Attendance monitoring	Legal Obligation and Public Task
Safeguarding and child protection	Legal Obligation and Public Task
SEND provision and support	Public Task
Behaviour and pastoral support	Public Task
Communication with parents and carers	Public Task
Statutory returns and census data	Legal Obligation
School security and CCTV	Public Task and Legitimate Interests
Emergency situations	Vital Interests
Service providers to maintain Polaris IT and digital systems effectively	Legitimate Interests

Activity	Lawful Basis
Photography and publicity activities (where applicable)	Consent

Special Category Data (Article 9 UK GDPR)

Some types of information are particularly sensitive and receive extra protection under data protection law. This includes information relating to health, disabilities, special educational needs, ethnicity, religion and safeguarding matters. Below are some examples of the legal bases we rely on when processing sensitive information (this list is not exhaustive).

Type of Information	Additional Legal Condition
Healthcare information	Health and Social Care
SEND information	Substantial Public Interest
Safeguarding records	Safeguarding and Protection of Children (Substantial Public Interest)
Emergency medical situations	Vital Interests
Ethnicity monitoring	Substantial Public Interest

Where We Ask For Consent

Photographs and videos help celebrate achievement, support learning and provide families with insight into school life. We may ask for consent in specific circumstances, such as: promotional photographs, social media content, media interviews, optional activities or surveys,

Where consent is used It is entirely voluntary and can be withdrawn at any time. Refusing consent will not affect a pupil's education or support.

CCTV

To support the safety and security of pupils, staff and visitors, some Polaris schools may operate CCTV systems in appropriate locations. CCTV helps the school to promote safeguarding, protect school property, investigate incidents, support health and safety and deter criminal activity.

Footage is securely stored and only accessed by authorised staff.

Children's Rights and Consents

Data protection rights belong to children as well as adults. As children mature, they may become capable of making decisions about how their personal information is used. When considering whether a pupil can make their own data protection decisions, we take account of:

- Age and maturity
- Understanding of the decision being made
- Ability to understand the consequences
- Safeguarding considerations
- Individual circumstances

As a general guide, young people aged around 12 years and above may be capable of expressing informed views regarding the use of their personal information. However, every child is different, and decisions are always assessed individually. Where a pupil is considered sufficiently mature to understand the implications of a decision, we may seek their views or consent directly, particularly where consent is required for an activity.

The best interests of the child will always remain our primary consideration.

Subject Access Requests (SAR)

Individuals have the right to request access to personal information held about them. Parents may often make requests on behalf of their child. However, as children become older and demonstrate sufficient maturity and understanding, the right to access information increasingly belongs to the child themselves.

When responding to a request, the school may consider:

- The wishes of the child.
- Their age and maturity.
- Any safeguarding concerns.
- Parental responsibility arrangements.
- The rights and freedoms of other individuals.

Requests should be made in writing to the Head Teacher of the school in the first instance and the Data Protection Officer.

Information That May Not Be Disclosed

We aim to be as transparent as possible. However, there are circumstances where some information cannot be provided. Examples include information that:

- Identifies another individual.
- Would breach another person's privacy rights.
- Could place a child or other person at risk of harm.
- Forms part of an ongoing safeguarding investigation.
- Is legally privileged.
- Could prejudice the prevention or detection of crime.
- Is exempt from disclosure under data protection legislation.

In these situations, information may be withheld or redacted where the law allows

Information Sharing Between Parents

We recognise that family circumstances can sometimes be complex. In most cases, parents who hold parental responsibility are entitled to receive information about their child's education, attendance and wellbeing. However, there may be times when information cannot be shared, including where:

- A court order restricts disclosure.
- Safeguarding concerns exist.
- Disclosure could place someone at risk.
- The information relates to a mature young person who has requested confidentiality and is considered capable of making that decision.

Each situation will be considered individually, with the welfare and best interests of the child at the centre of decision-making.

How We Keep Information Safe

Protecting personal information is important to us. We use a range of physical, organisational and technical measures to protect personal information, including:

- Secure IT systems and networks
- Role-based access controls.
- Password protection and encryption.
- Cyber security measures.
- Staff training.
- Confidentiality agreements
- Secure storage and disposal procedures.
- Data breach management processes.

Only authorised individuals can access personal information and only where they need it to perform their role.

How Long We Keep Personal Information

We only keep personal information for as long as it is needed. As a school, we must retain certain records for specific periods to meet our legal, educational, safeguarding, and operational responsibilities.

The length of time we keep information depends on the type of record and the reason it was collected. Retention periods are based on legal requirements, Department for Education guidance, safeguarding obligations, and recognised records management standards for schools.

We do not keep personal information indefinitely. When information is no longer required, it is securely deleted, destroyed, or anonymised in accordance with our records management and retention procedures.

Your Rights

Data protection law gives individuals important rights over their personal information.

Under UK GDPR, parents, carers and, where appropriate, pupils have the right to:

- Be informed about how information is used.
- Request access to personal information.
- Request correction of inaccurate information.
- Request restriction of processing in certain circumstances.
- Object to processing in certain circumstances.
- Withdraw consent where consent has been used.
- Complain about how information has been handled.

Not all rights apply in every situation, particularly where schools are required to meet legal, educational or safeguarding responsibilities. We will always consider requests carefully and explain any decisions we make.

Complaints and Concerns

We hope to resolve any concerns quickly and fairly.

If you have questions about this Privacy Notice or concerns about how personal information has been handled, please contact the Head Teacher of the school in the first instance.

If you remain dissatisfied, you may contact the Information Commissioner's Office (ICO):
Website: www.ico.org.uk
Helpline: 0303 123 1113

Polaris School is committed to handling personal information responsibly, transparently and always in the best interests of the children and families we support.