



Sharing of Information with Parents and Carers

1. Purpose of this Document

All our schools are Independent Schools. While some of our schools work with a narrower age ranges of children across our schools we work with children aged 5–18. This document explains how Polaris Education manages and shares information about pupils with parents and carers. It ensures transparency while complying with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Education (Pupil Information) (England) Regulations 2005
- Independent school safeguarding and confidentiality expectations

Our approach balances:

- The rights of parents/carers
- The rights and wishes of the pupil
- The legal obligations placed on the school

2. Key Principles

- Personal data belongs to the pupil.
- Parents may act on behalf of younger children, but this changes with age, capacity, and maturity.
- The school will share information only where it is lawful, proportionate, and appropriate.
- The best interests and welfare of the pupil are always central.

3. Educational Record vs Personal Data

There are two key legal frameworks governing access:

Framework	What it Covers	Key Feature
Education Regulations (2005)	The educational record	Gives parents a defined right of access
UK GDPR / Data Protection Act 2018	All other personal data	Rights belong primarily to the pupil

This distinction is critical because:

Parents have a stronger automatic right to the educational record than to other types of personal data.

4. What the School Will Share **WITHOUT** the Child's Consent (Education Regulations)

Under the Education (Pupil Information) (England) Regulations 2005, parents with Parental Responsibility are entitled to access their child's educational record, and:

- The child's consent is not required for this specific category of information
- The school must respond within 15 school days to any requests but will routinely share information which falls under this bracket in documents such as Educational reports or EHCP review reports without parental request.

4.1 Information That Will Normally Be Shared

The following will generally be provided to parents, regardless of the pupil's age (subject to redactions and safeguarding considerations):

Academic and Progress Information

- Annual and termly school reports
- Examination results and test scores
- Teacher assessments and attainment data
- Curriculum progress tracking

Special Educational Needs Information

- EHCPs and associated documentation
- SEN support plans (IEPs or equivalent)
- Reports produced for educational purposes by professionals

Attendance and Admissions Data

- Attendance register information
- Absence records and supporting documentation
- Admission forms and pupil background data

Behaviour and Discipline Records

- Formal behaviour logs
- Records of exclusions or suspensions
- Serious incident records (in redacted form where required)

Official School Communications

- Letters and emails sent to/from parents
- Formal correspondence with Local Authorities
- Records relating to school decisions affecting the pupil

4.2 Important Clarification

Even where a pupil is:

- Aged 12+ (considered more data-aware), or
- Aged 16+ (presumed competent)

The educational record can still be shared with parents under these Regulations without requiring the pupil's consent, provided no exemptions apply.

However, the school will still:

- Act sensitively and proportionately
- Consider whether there are safeguarding or welfare concerns
- Where appropriate, inform or involve the pupil

5. What May NOT Be Shared Without Consent (GDPR Applies)

Outside the educational record, parental access is more limited, particularly for older pupils.

The following categories are not automatically shared and may require the pupil's consent (especially age 12+):

- Pastoral or counselling records
- Safeguarding/child protection files
- Sensitive personal disclosures (e.g. health, identity, relationships)
- Internal staff communications or draft documents
- Personal teacher notes
- CCTV (separate SAR process)

For pupils aged 16–18, these will generally only be shared with explicit consent, unless there is a legal or safeguarding reason.

6. Age-Based Approach to Information Sharing

Ages 5–11

- Parents typically receive full access to the educational record
- Consent is not usually required

Ages 12–15

- Educational record: shared with parents under Regulations
- Other data: pupil's views and consent increasingly important

Ages 16–18

- Educational record: can still be shared under Regulations
- Other data: controlled by the pupil unless safeguarding/legal grounds apply

7. Legal Restrictions and Required Redactions

Even where information must be shared, the school is legally required to remove or withhold certain elements:

7.1 Third-Party Information

- Names and identifying details of other pupils or individuals will be redacted

7.2 Risk of Serious Harm

- Information may be withheld if disclosure could cause serious physical or mental harm

7.3 Social Care / Safeguarding Data

- Certain records protected under safeguarding and social work law will not be disclosed

8. Safeguarding Considerations

Safeguarding responsibilities override all other considerations.

The school may:

- Refuse or limit disclosure where it could place a child or others at risk
- Share information without consent where necessary to protect a pupil

9. How Requests Are Managed

When a request is received, the school will:

1. Verify the identity and authority of the requester
2. Identify whether the request falls under:
 - Education Regulations, or
 - GDPR (Subject Access Request)
3. Assess the pupil's age, maturity, and any safeguarding concerns
4. Review records and apply necessary redactions
5. Respond within the required timeframe

10. Parental Responsibility

Having Parental Responsibility means:

- A parent may request access to the educational record
- But they are not entitled to unrestricted access to all personal data

The school must balance:

- Legal rights
- The child's autonomy
- Confidentiality and safeguarding obligations

11. Contact Details

For further information or to make a request, please contact:

School Office / Data Protection Officer

Further guidance is available from the Information Commissioner's Office (ICO):

<https://ico.org.uk>

12. Review of This Document

This guidance is reviewed regularly to ensure compliance with current legislation and best practice.