



New Direction School



Pupils, Parents and Carers
Privacy Notice

Reviewed Date:	Reviewed By:	List of changes	Next Review
August 2021	Luke Collins	<ul style="list-style-type: none"> Reviewed and Updated by Luke Collins in August 2021 	August 2022
February 2023	Luke Collins	<ul style="list-style-type: none"> Reviewed by Luke Collins with no changes made 	February 2024
February 2024	Luke Collins	Reviewed by Luke Collins with no changes made	February 2025
February 2025	Luke Collins	Reviewed by Luke Collins with no changes made	February 2026
February 2026	Luke Collins	Refreshed privacy notice aligned with UK GDPR, Data Protection Act 2018, DfE model privacy notice guidance updated October 2025, KCSIE 2025 and Working Together to Safeguard Children 2026	February 2027

Contents

1. **A SHORT SUMMARY FOR PUPILS** ERROR! BOOKMARK NOT DEFINED.
2. **ABOUT THIS PRIVACY NOTICE** ERROR! BOOKMARK NOT DEFINED.
3. **WHO WE ARE** ERROR! BOOKMARK NOT DEFINED.
4. **THE PERSONAL INFORMATION WE COLLECT** ERROR! BOOKMARK NOT DEFINED.
5. **SPECIAL CATEGORY AND CRIMINAL OFFENCE INFORMATION** ERROR! BOOKMARK NOT DEFINED.
6. **WHERE WE GET PERSONAL INFORMATION FROM** ERROR! BOOKMARK NOT DEFINED.
7. **WHY WE USE PERSONAL INFORMATION AND OUR LAWFUL BASES** ERROR! BOOKMARK NOT DEFINED.
8. **CONSENT, PHOTOGRAPHS AND PUBLICITY** ERROR! BOOKMARK NOT DEFINED.
9. **AUTOMATED DECISION-MAKING AND PROFILING** ERROR! BOOKMARK NOT DEFINED.
10. **WHETHER INFORMATION IS MANDATORY OR VOLUNTARY** ERROR! BOOKMARK NOT DEFINED.
11. **HOW WE STORE AND PROTECT INFORMATION** ERROR! BOOKMARK NOT DEFINED.
12. **HOW LONG WE KEEP INFORMATION** ERROR! BOOKMARK NOT DEFINED.
13. **WHO WE SHARE INFORMATION WITH** ERROR! BOOKMARK NOT DEFINED.
14. **DEPARTMENT FOR EDUCATION AND THE NATIONAL PUPIL DATABASE** ERROR! BOOKMARK NOT DEFINED.
15. **SAFEGUARDING AND CHILD PROTECTION INFORMATION SHARING** ERROR! BOOKMARK NOT DEFINED.
16. **TRANSFERRING INFORMATION OUTSIDE THE UK** ERROR! BOOKMARK NOT DEFINED.
17. **YOUR RIGHTS** ERROR! BOOKMARK NOT DEFINED.
18. **SUBJECT ACCESS REQUESTS** ERROR! BOOKMARK NOT DEFINED.
19. **COMPLAINTS** ERROR! BOOKMARK NOT DEFINED.
20. **CONTACT DETAILS** ERROR! BOOKMARK NOT DEFINED.
- APPENDIX 1: KEY LEGISLATION AND GUIDANCE** ERROR! BOOKMARK NOT DEFINED.
- PUBLICATION AND ACCESSIBILITY** ERROR! BOOKMARK NOT DEFINED.

1. A short summary for pupils

This section explains the main points in a simple way. The rest of this notice gives more detail for pupils, parents and carers.

Question	Answer
What information do we hold?	Information such as your name, date of birth, address, attendance, learning, behaviour, SEND, medical, wellbeing and safeguarding information.
Why do we need it?	To help you learn, keep you safe, support your wellbeing, meet your needs, arrange exams and qualifications, and meet legal duties.
Who sees it?	Only people who need it for their role. This can include school staff, local authorities, social care, health professionals, exam boards, Ofsted and the Department for Education.
Can we share information to keep you safe?	Yes. If we are worried that you or another child may be at risk, we may need to share information without asking for consent.
Do we use CCTV?	Yes. We use CCTV and gate cameras to help keep pupils, staff, visitors, animals and the school site safe. CCTV is only viewed by authorised people when there is a proper reason, such as safeguarding, safety, security or investigating an incident.
Can you ask questions?	Yes. You, your parents or carers can contact the Data Protection Officer using the details at the end of this notice.

2. About this privacy notice

New Direction School has a legal duty to explain how we collect, use, store and share personal information about pupils. This is called a privacy notice.

This notice is for pupils, parents and carers. It explains what personal information we hold, why we use it, the lawful bases we rely on, who we may share it with, how long we keep it and the rights individuals have under data protection law.

This notice should be read alongside the school's Data Protection Policy, Safeguarding and Child Protection Policy, Online Safety Policy, Behaviour Policy, Attendance Policy, SEND information, CCTV and Video Surveillance Policy, CCTV Data Protection Impact Assessment and any relevant consent forms.

3. Who we are

New Direction School is the data controller for the personal information described in this notice. This means the school decides why and how personal information is used.

Role	Named person / details
Proprietor	Yvonne Evans
Directors	Luke Collins and Hannah Oliver

Role	Named person / details
Head of Education	Luke Collins
Designated Safeguarding Lead	Luke Collins
Deputy Designated Safeguarding Leads	Hannah Oliver, Emily Smith and Nikki Morris
Data Protection Officer	Luke Collins
Main telephone number	01246 810456
Data Protection Officer email	luke@new-direction.org.uk

4. The personal information we collect

We may collect, use, store and share the following types of personal information where relevant and appropriate:

- identity information, such as name, date of birth, gender, unique pupil number and pupil identifiers
- contact information, such as address, telephone numbers and parent/carer contact details
- family and emergency contact information
- characteristics, such as ethnicity, language, nationality, eligibility information and year group
- attendance information, including sessions attended, absences, reasons for absence and punctuality
- admissions, previous school and transition information
- assessment, progress, curriculum, qualifications and exam information
- SEND information, including Education, Health and Care Plan details, reviews, provision and support plans
- medical, health, care and wellbeing information where needed to support safety and education
- behaviour, achievement, rewards, sanctions, suspensions and exclusion information
- safeguarding, child protection and welfare information
- looked-after child, previously looked-after child, child in need, child protection or early help information where relevant
- post-16 learning information, including courses studied and learning hours where relevant
- destination and careers information where relevant
- photographs, video or moving images where used for identification, learning, records, displays or publicity with consent where required
- CCTV and video surveillance footage, including footage from external cameras, classroom cameras where installed, and Ring doorbell cameras at the school gates. This may include images of pupils, parents, carers, staff, visitors, contractors, vehicles and movements around the school site
- records of communication with pupils, parents, carers, professionals and agencies
- information needed to access school systems, online learning platforms or exams systems

We use Arbor as our management information system to record pupil data and track attendance and behaviour. We use CPOMS to record safeguarding and child protection concerns. Access to these systems is restricted to authorised staff.

5. Special category and criminal offence information

Some information is more sensitive and receives extra protection under data protection law. This is called special category data.

Special category information we may process includes information about ethnicity, health, medical needs, disability, SEND, safeguarding, wellbeing, and other information that may reveal sensitive personal circumstances.

Photographs and video images are personal data. They are not automatically special category data unless they are used in a way that reveals special category information or for biometric identification. CCTV footage may reveal special category information by inference, for example where it relates to health, disability, SEND, behaviour, safeguarding or welfare. We do not use biometric identification unless families are given separate information first.

We may also process criminal offence information where this is relevant to safeguarding, behaviour, risk assessment, police involvement, legal proceedings or the protection of pupils and others. We will only do this where the law allows it and where it is necessary and proportionate.

6. Where we get personal information from

Most information comes from pupils, parents, carers and school staff. We may also receive information from:

- previous schools or education providers
- local authorities, including Derbyshire, Nottinghamshire, Rotherham and Sheffield
- the Department for Education and other government departments or agencies
- children’s social care, early help services and safeguarding partners
- health services and other medical or therapeutic professionals
- police, courts, tribunals and youth justice services where relevant
- exam boards, awarding bodies and qualification providers
- professionals or agencies involved in supporting the pupil or family
- CCTV systems, classroom cameras where installed, Ring doorbell cameras and authorised staff reviewing footage for a legitimate school purpose

7. Why we use personal information and our lawful bases

We only use personal information when we have a lawful basis to do so under UK GDPR and the Data Protection Act 2018. In most cases, schools use pupil information because they have a legal obligation, because it is necessary to carry out a public task, because it is necessary to protect vital interests, or because consent has been given for a specific optional purpose.

Purpose	What this means	Lawful basis / condition
Providing education and support	To teach pupils, plan learning, monitor progress and provide appropriate support.	Public task; legal obligation
Attendance	To record attendance, follow up absence, meet statutory attendance duties and support safeguarding.	Legal obligation; public task

Purpose	What this means	Lawful basis / condition
SEND and EHCP support	To identify needs, provide support, hold reviews and work with professionals.	Legal obligation; public task; substantial public interest; health/social care condition where relevant
Safeguarding and child protection	To protect pupils from harm, share concerns, record decisions and work with safeguarding partners.	Legal obligation; public task; vital interests; substantial public interest
Medical, health and wellbeing	To keep pupils safe, provide first aid or care, make reasonable adjustments and support wellbeing.	Public task; vital interests; health/social care condition; explicit consent where required
Behaviour and welfare	To support positive behaviour, manage risk, record incidents and promote safety.	Public task; legal obligation; substantial public interest where relevant
CCTV and video surveillance	To support safeguarding, pupil welfare, site security, supervision, health and safety, behaviour incident review, prevention and detection of crime, complaints, allegations, insurance matters and legal/regulatory duties. CCTV covers most external areas including the yard, stables, paths and external building areas. Some classrooms have CCTV and this may expand to all classrooms in the future. Ring doorbell cameras are used at the school gates.	Public task; legal obligation; legitimate interests; vital interests where urgent; substantial public interest where safeguarding or serious risk is involved
Exams and qualifications	To enter pupils for qualifications and share information with awarding bodies.	Public task; legal obligation; legitimate interests or contract where relevant
School improvement and reporting	To evaluate provision, meet accountability duties and report to regulators.	Legal obligation; public task
Communication with parents and carers	To share information about learning, welfare, attendance, school arrangements and emergencies.	Public task; legal obligation; vital interests where urgent
Photographs, publicity and optional activities	To use images for publicity, website, social media or optional non-essential purposes.	Consent where required

8. Consent, photographs and publicity

We do not usually rely on consent for core education, safeguarding, attendance, SEND, statutory reporting or welfare purposes because the school has legal duties and public task responsibilities.

We may ask for consent for optional uses of information, such as certain photographs, website or social media publicity, promotional materials, optional activities or other non-essential uses.

Where we ask for consent, we will explain what the consent covers and how it can be withdrawn.

Withdrawing consent will not affect lawful processing that has already taken place before consent was withdrawn. It will not usually affect processing that the school is required or permitted to carry out under another lawful basis, such as safeguarding or legal obligations.

9. CCTV, classroom cameras and Ring doorbells

New Direction School uses CCTV and video surveillance to help keep pupils, staff, visitors, animals and the school site safe.

CCTV currently covers most external areas of the school site, including the yard, stables, paths around the buildings and external access areas. Some classrooms also have CCTV, and the school intends to expand CCTV coverage to all classrooms in the future. Ring doorbell cameras are used at the school gates.

CCTV may be used to:

- support safeguarding and child protection
- support pupil welfare and supervision
- help prevent and respond to unsafe behaviour, bullying, damage, theft, trespass or unauthorised access
- support the safety of pupils, staff, visitors and animals
- review behaviour, health and safety, safeguarding or security incidents
- support the investigation of complaints, allegations, accidents or incidents
- provide evidence to safeguarding partners, local authorities, police, insurers, legal advisers or regulators where necessary and lawful

CCTV is not used for routine monitoring of staff performance. CCTV may be reviewed where there is a specific safeguarding, behaviour, health and safety, complaint, allegation, security or legal reason.

Classroom CCTV is more sensitive because it captures pupils and staff during learning. The school will keep the use of classroom CCTV under review and will complete or update a Data Protection Impact Assessment before expanding classroom CCTV further.

CCTV footage is only accessed by authorised people. Current authorised access is restricted to Luke Collins, Hannah Oliver and Yvonne Evans. Tel Group may access the system where this is necessary to provide technical support or maintenance.

Routine CCTV footage is stored centrally on the school server and is normally kept for 30 days before being automatically deleted. Ring doorbell footage is stored in the Ring App for 30 days. Footage may be downloaded and kept for longer where it is needed for a specific reason, such as safeguarding, behaviour, complaints, allegations, police enquiries, insurance, legal proceedings or regulatory matters.

Where CCTV footage is downloaded, it will be stored securely, access will be restricted, and it will be deleted when it is no longer needed.

10. Automated decision-making and profiling

We do not currently make decisions about pupils using solely automated decision-making or profiling. If this changes, we will update this notice and explain the processing, the reasons for it and the rights available.

11. Whether information is mandatory or voluntary

Some information must be provided because it is required by law, needed to provide education, or necessary to keep pupils safe. Some information is voluntary, such as consent for certain photographs or publicity. Where information is voluntary, we will make this clear and explain the consequences of not providing it where relevant.

12. How we store and protect information

We hold pupil information securely in electronic and, where necessary, paper records. We use appropriate technical and organisational measures to reduce the risk of personal information being accidentally lost, altered, disclosed, misused or accessed by unauthorised people.

Access to pupil information is limited to staff and authorised professionals who need the information to carry out their role. Staff receive information and data protection expectations through school policies, induction, safeguarding procedures and role-related training.

Our key systems include Arbor for pupil records, attendance and behaviour information, and CPOMS for safeguarding and child protection records. These systems are access-controlled and used in line with school procedures.

CCTV footage is stored securely and access is restricted to authorised staff only. Routine CCTV footage is stored centrally on the school server. Ring doorbell footage is stored in the Ring App. Access to CCTV footage is limited and should only take place where there is a legitimate school reason, such as safeguarding, safety, behaviour, security, complaints, allegations, insurance or legal matters. The school keeps access to CCTV under review and records when footage is downloaded or retained beyond the normal retention period.

13. How long we keep information

We keep personal information only for as long as necessary for the purpose for which it was collected, including to meet legal, safeguarding, educational, audit and regulatory requirements.

Pupil records may be kept while a pupil attends New Direction School and for a period after the pupil leaves. Safeguarding and child protection records are kept, transferred and retained in line with statutory safeguarding guidance, local safeguarding procedures and the school's retention arrangements.

Where a pupil moves to another school or education provider, the main pupil record and any child protection file will be transferred securely where appropriate. Child protection files are transferred separately from the main pupil file, securely, and with confirmation of receipt wherever possible.

Routine CCTV footage is normally kept for 30 days and then automatically deleted. Ring doorbell footage is also normally kept for 30 days within the Ring App. CCTV footage may be downloaded and kept for longer where it is needed for a specific lawful reason, such as a safeguarding concern, behaviour incident, complaint, allegation, police enquiry, accident, insurance matter, legal claim or regulatory requirement. Downloaded footage will be reviewed and deleted when it is no longer needed.

The school should maintain a Data Retention Schedule setting out retention periods for different categories of school records. When information is no longer required, it will be securely deleted, destroyed or anonymised.

14. Who we share information with

We do not share personal information with third parties unless the law allows us to do so, it is necessary for education, safeguarding, welfare or school operations, or consent has been given where required.

We may share pupil information with:

- parents, carers and those with parental responsibility where appropriate and lawful
- local authorities, including Derbyshire, Nottinghamshire, Rotherham and Sheffield, for education, SEND, safeguarding, attendance, exclusions, funding, statutory returns and support
- the Department for Education, including through statutory data collections such as the school census
- Ofsted and other regulators or inspectors
- children's social care, early help services, safeguarding partners and local multi-agency services
- health services and health or therapeutic professionals
- police, courts, tribunals and youth justice services where necessary and lawful
- previous, receiving or destination schools, colleges or education providers
- exam boards and awarding bodies, including Pearson, AQA, ASDAN, The Prince's Trust and Pony Club where relevant
- youth support services, careers services, post-16 providers and destination providers where relevant
- professional advisers, consultants, legal advisers, auditors or insurers
- IT, management information and safeguarding system providers, including Arbor and CPOMS
- CCTV system support providers, including Tel Group, where access is necessary for maintenance, support or troubleshooting
- police, LADO, safeguarding partners, local authorities, insurers, legal advisers, regulators or other relevant agencies where CCTV footage is needed for safeguarding, safety, crime prevention or detection, complaints, allegations, insurance, legal or regulatory purposes
- charities, voluntary organisations, alternative provision providers or external specialists where they support a pupil and there is a lawful reason to share information

15. Department for Education and the National Pupil Database

We are required to share certain pupil information with the Department for Education through statutory data collections, including the school census where applicable.

The Department for Education may store information in the National Pupil Database. The National Pupil Database is used by the Department for Education to support education, research, statistics, policy development, school accountability and funding. The Department for Education may share information from the National Pupil Database with approved organisations in line with strict controls.

Parents, carers or pupils aged 16 or over may have the right to object to certain information being shared with local authorities or youth support services where the law provides this right. Requests should be made to the school or the relevant local authority.

16. Safeguarding and child protection information sharing

Safeguarding pupils is a core responsibility of the school. Data protection law does not prevent the sharing of information where this is necessary to keep children safe or promote their welfare.

We may share information without consent where this is necessary to safeguard or promote the welfare of a child, protect a child or another person from harm, prevent or detect crime, comply with a legal duty, or support effective multi-agency working.

Where there is a safeguarding concern, staff must follow the school's Safeguarding and Child Protection Policy and record concerns on CPOMS. The Designated Safeguarding Lead will decide what information needs to be shared, with whom and why, taking account of statutory guidance and the safety of the pupil.

Where a pupil leaves New Direction School, the Designated Safeguarding Lead will ensure that child protection information is transferred to the new school or education provider in line with statutory guidance. This will normally be done as soon as possible and within required timescales.

17. Transferring information outside the UK

We do not routinely transfer pupil personal information outside the UK. If we need to transfer information outside the UK, we will make sure appropriate safeguards are in place in line with UK GDPR, such as adequacy regulations or approved contractual safeguards.

18. Your rights

Under data protection law, individuals have rights over their personal information. These rights may depend on the lawful basis for processing and the circumstances.

Rights may include the right to:

- be informed about how personal information is used
- request access to personal information
- ask for inaccurate information to be corrected
- ask for information to be erased in certain circumstances
- ask for use of information to be restricted in certain circumstances
- object to the use of information in certain circumstances
- ask for information to be transferred to another organisation in certain circumstances
- object to direct marketing
- not be subject to solely automated decisions that have legal or similarly significant effects
- complain to the Information Commissioner's Office

These rights are not absolute. For example, the school may need to continue processing information to meet legal duties, provide education, protect pupils or maintain safeguarding records.

19. Subject access requests

Pupils, parents or carers may request access to personal information held by the school. This is called a subject access request.

Where a request is made, the school will consider the pupil's age, understanding, best interests, confidentiality, safeguarding, parental responsibility and the rights of other individuals before sharing information.

Subject access requests may include requests for CCTV footage where the pupil or individual is identifiable. Before sharing CCTV footage, the school will consider the rights and freedoms of other people who may appear in the footage, including other pupils, staff, visitors or family members. The school may need to blur or redact footage, provide still images, describe the relevant information, or refuse/restrict disclosure where an exemption applies, such as safeguarding, crime prevention, legal proceedings or protection of another person's rights.

To make a subject access request, please contact the Data Protection Officer using the contact details below. The school may need to ask for proof of identity or clarification to help locate the information requested.

20. Complaints

We take concerns about personal information seriously. If you are concerned about how we collect, use, store or share personal information, please contact the Data Protection Officer first so that we can try to resolve the concern.

You also have the right to complain to the Information Commissioner's Office:

Website: <https://ico.org.uk/make-a-complaint/>

Telephone: 0303 123 1113

Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

21. Contact details

Contact	Details
Data Protection Officer	Luke Collins
Email	luke@new-direction.org.uk
Telephone	01246 810456
School	New Direction School

Appendix 1: Key legislation and guidance

This privacy notice has been refreshed with reference to the following legislation and guidance:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Education Act 1996 and associated school data collection duties where applicable
- Children Act 1989 and Children Act 2004
- Keeping Children Safe in Education 2025
- Working Together to Safeguard Children 2026
- Special educational needs and disability code of practice: 0 to 25 years
- Department for Education data protection and privacy notice model documents, updated October 2025
- Department for Education guidance on taking and using photos and videos and using CCTV in schools
- Information Commissioner's Office guidance on privacy information and individual rights
- Information Commissioner's Office guidance on CCTV and video surveillance
- New Direction School CCTV and Video Surveillance Policy
- New Direction School CCTV Data Protection Impact Assessment
- Education (Independent School Standards) Regulations 2014