



The Crypt School Data Privacy Notice for Pupils and Parents

(How we use pupil and parent information)

The Crypt School is the Data Controller for the use of personal data in this privacy notice

Introduction

This notice summarises why we collect personal data about our pupils and their families; how we use that data; and your rights in relation to the personal data the School holds about you. In this notice, we use the term 'parent' to mean any person having parental responsibility or care of a child. "Personal data" means data that relates to a living individual who can be identified. It includes names, addresses and other contact details, photographs, identification numbers or online identifiers and location data.

The Crypt School is the data controller of the personal information you provide to us. This means the School determines the purposes for which, and the manner in which, any personal data is to be processed. In some cases, your data will be outsourced to a third party processor.

We take the security of your data seriously. We have internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed and is not accessed except by the School's employees and service providers in the performance of their duties.

The Crypt School's Data Protection Officer is Gloucestershire County Council. Their role is to oversee and monitor the School's data protection procedures, and to ensure that they are compliant with the GDPR. Their contact details are schoolsdpo@gloucestershire.gov.uk

What data is collected?

The categories of pupil information that we collect, hold and share (with appropriate people when required) include:

- Personal Information (such as name, date of birth, siblings at the School, address, home contact details and unique pupil number)
- Personal characteristics, including
 - Ethnicity eg Asian, African, White, mixed race etc
 - Language

- Nationality
- Country of birth
- Whether a pupil is eligible for financial support through 'pupil premium'

This information is used for purposes including the annual national school census and to help ensure you receive financial support when needed. The census is an annual survey of all students in the country undertaken by the Government

- Photographic images (for security, pupil management and educational purposes)
- Safeguarding information, such as your personal circumstances or the involvement of care professionals
- Attendance information (such as sessions attended, number of absences and absence reasons). We need to record this by law to ensure children are receiving their entitlement to an education
- Assessment information (such as Key Stage 2 results, on-going assessments throughout pupils' time in school and GCSE/A Level results)
- Information about behaviour, including detentions, suspensions, use of School IT and Closed Circuit TV recordings, so that we can promote pupils' welfare and help them achieve their best
- Special educational needs and disabilities information
- Medical and administration, such as doctors' information, child health, dental health, medication, allergies and dietary requirements, to ensure pupils have the support they are entitled to and are kept safe and well
- Biometric data, which is used for the site security and cashless catering payment systems (we collect this data only with your consent)
- Information about trips and extra-curricular or enrichment activities
- Driving licence and vehicle insurance/MOT information (for student drivers only)
- Daily events (for example, if you are sent home sick)
- Destination data
- Data about alumni of the School (processed with your consent).

The categories of parent information that we collect, hold and share (with appropriate people when required) include:

- Personal Information (such as name, address and home contact details – email, mobile telephone)
- Details of your family circumstances
- Details of any safeguarding information, including court orders or professional involvement
- Records of your correspondence and contact with us, including any complaints
- Parents' occupations, so that we may invite you to become involved in relevant School activities (we collect and hold this data only with your consent)
- Bank account details (in relation to processing of payments or donations to the School). We obtain your consent to collect and hold this information. We do not share this information with anyone, but it may be inspected by accountants for auditing (checking) purposes.
- Information about any health conditions we need to be aware of
- Photographs and CCTV images captured in school

- Data that we have received from other organisations, including other schools and social services.

How we collect your information

We obtain pupil information from parents/carers via registration forms completed through the Applica system at the start of each academic year. When a child joins us from another primary or secondary school, we are sent a secure file containing relevant information. Pupil data is essential for the school's operational use. Sometimes we need your consent to collect or use your data (for example, using pupils' photographs on the School website, or using biometric data for the cashless payment system for catering). We will make it clear when we need your agreement to collect or use your data in a certain way and will make it clear how you can withhold or withdraw your agreement. Where consent is required in relation to pupils, we seek consent from the parent/s of the pupil until the pupil has sufficient understanding to make their own decision (this is usually considered to be at 12 years of age; see our Data Protection Policy for more information). Where you have given us consent, you have the right to withdraw it at any time (contact the Compliance Officer at foi@crypt.gloucs.sch.uk)

Why do we collect and use information about you?

The Crypt School holds the legal right to collect and use personal data relating to pupils and their families; and we may also receive information regarding them from their previous school, local authorities and the Department for Education.

We use your data:

- To support, monitor and report on pupil learning and progress, including taking external exams and careers education and support
- To keep children safe while they are at the School
- To provide a wider enrichment and extra-curricular programme for pupils, including working with external partners
- To provide wider care and support for pupils in our School – this is known as 'pastoral care'
- To assess the quality of what we do as a school, so that we can continually learn and improve
- To meet the requirements of the law regarding publication, data sharing and other legal obligations placed on us by the Department for Education (DfE), including those in relation to:
 - The Education Act 1996
 - The Education (Information about Individual Pupils) (England) Regulations 2013, which require schools to provide data to certain national databases on education
 - Keeping Children Safe in Education (which sets out rules for schools in order to keep pupils safe and promote their welfare)
 - The School Admissions Code (which ensures that school places are allocated and offered fairly).
- To operate The Crypt School alumni programme.
- To process payments for school services and clubs.
- To administer admissions waiting lists.

- j. For archiving, scientific or historical research purposes.

Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by contacting the school.

Use of your personal data for filtering and monitoring purposes

School systems and users are protected by security, filtering and monitoring services. Your use of school devices and systems (including the school Wi-Fi), regardless of time, location or connection, including encrypted content, can be monitored and/or viewed by the relevant authorized staff members. Activity on school accounts on any device may be viewed by the relevant authorized staff. All devices using the school Wi-Fi connection for internet access, and off-site school-owned devices, may be filtered. We do this so that we can:

- Comply with *Keeping Children Safe in Education*, health and safety and other legal obligations
- Comply with our policies
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)

The lawful basis on which we process data

We will only use your information when the law allows us to. We need to establish a 'lawful basis' to do this. Our lawful bases for processing your personal information for the reasons listed above are:

- Consent: the individual has given clear consent to process their personal data for a specific purpose;
- Contract: the processing is necessary for a contract with the individual
- Legal obligation: the processing is necessary to comply with the law (not including contractual obligations)
- Vital interests: the processing is necessary to protect someone's life
- Public task: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the School's use of your data. Where you've agreed

that we are allowed to use your information, you may take back this consent at any time. We will make this clear when requesting your consent, and explain how to withdraw consent if you want to.

Our basis for using special category data

For 'special category' data (more sensitive personal information), we only collect and use it when we have both a lawful basis, as set out above, and one of the specific conditions set out in UK data protection law:

- We have obtained your explicit consent to use your information in a certain way
- We need to use your information under employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The information has already been made obviously public by you
- We need to use it to make or defend against legal claims
- We need to use it for reasons of substantial public interest as defined in legislation
- We need to use it for health or social care purposes, and it is used by, or under the direction of, a professional obliged to confidentiality under law
- We need to use it for public health reasons, and it's used by, or under the direction of, a professional obliged to confidentiality under law
- We need to use it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the use is in the public interest.

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law.

Storing personal data

We hold your data securely either on our school network, external servers (cloud storage) or insecure physical locations. Offices containing secure data have restricted access. We also make sure that people only have access to data that they need for their job and not necessarily everything we hold about you. Access to any sensitive personal data is strictly restricted to only those who need to see it.

We keep pupils' data securely for the set amount of time shown in our data retention schedule, which is available on request. Pupils' school record information is retained until after their 25th birthday; we are required to do this by law. After that, limited information from your record is archived in secure storage in The Crypt School Archive and may usually only be accessed with your agreement (see our Data Protection Policy for more information).

Other information is disposed of securely in accordance with our Records Retention Schedule. This sets out the time period for which different categories of data are kept, and ensures that personal information is not kept for longer than necessary. We use a company with special authorisation to destroy paper records of personal data.

Who we share pupil information with

We routinely share pupil information with:

- Schools that our pupils attend after leaving us
- Our local authority, which is Gloucestershire County Council (GCC)
- the Department for Education (DfE)
- Bromcom, The Safeguarding Company Limited and AppliCAA, who provide software that we use to manage admissions, school and pupil data. Data is stored on cloud servers and accessed by those companies only as required by the school
- the NHS or school nurse (including to support national vaccination programmes)
- Counsellors or educational psychologists as and when appropriate
- Alps, which is a system that uses students' assessment results to help us set appropriate targets for GCSE and A level study and evaluate our teaching
- Exam boards for external examinations
- Microsoft, Google, Apple and the Oxford University Press, for the provision of IT learning accounts
- Other companies providing educational apps (e.g. MyMaths)
- Careers & Enterprise Company, for the evaluation of the School's careers provision
- Unifrog, to help pupils plan their post-18 pathways
- ParentPay, to enable parents to pay online for catering, school trips and receive school communications.

Occasionally we also share pupil information with the Police, in order to promote pupils' safety. We also provide references to possible future places of education or employment at your request.

Why 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.

Department for Education

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 data collections, under:

- Section 537A of the Education Act 1996
- the Education Act 1996 s29(3)
- the Education (School Performance Information)(England) Regulations 2007
- regulations 5 and 8 School Information (England) Regulations 2008
- the Education (Pupil Registration) (England) (Amendment) 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

Youth support services

We also pass certain information about pupils aged 13+ and 16+ to our local authority (Gloucestershire County Council) and/or the provider of youth support services, as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the

Education Act 1996. You (or your parent, if you are under 16) can request that only limited personal information is passed on, by informing us.

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.

Transferring data internationally

Where we transfer personal data to another country or territory, we will do so in accordance with data protection law.

Requesting access to your personal data

Under data protection law, 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 for a parent to be given access to your child's educational record, we ask that you do so in writing on a Data Subject Access Request form, which is available on the School website (Policies and Forms) or from the School Office. Submitting your request using the form enables us to process your request more efficiently, but you may also make a request verbally or by email, for example.

Depending on the lawful basis above, you also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of your personal information we have about you – this is called 'right of access', this is also known as a subject access request (SAR), data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances
- rights in relation to automated decision making and profiling (*The Crypt School does not take any decisions or conduct profiling by automated means*).
- the right to withdraw consent at any time (where relevant).
- the right to complain to the Information Commissioner if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it.

Contact us

If you have any questions or concerns about the way we are collecting or using your personal data, we request that you raise this with us in the first instance by contacting the Compliance Officer (foi@crypt.gloucs.sch.uk).

Alternatively, you can contact the School's Data Protection Officer at: Gloucestershire County Council, School's Data Protection Team, Information Management Service, Shire Hall, Westgate Street, Gloucester GL1 2TG (tel. 01452 583619 or email schoolsdpo@gloucestershire.gov.uk).

Should you wish to, you may make a complaint to the Information Commissioner's Office at

<https://ico.org.uk/global/contact-us/contact-us-public/>

Last updated: May 2026

Annex: 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 (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. The data in the NPD is provided as part of the operation of the education system and is used for research and statistical purposes to improve, and promote, the education and well-being of children in England.

The evidence and data provide DfE, education providers, Parliament and the wider public with a clear picture of how the education and children's services sectors are working in order to better target, and evaluate, policy interventions to help ensure all children are kept safe from harm and receive the best possible education.

To find out more about the Department's NPD data sharing process, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

Sharing

DfE will only share pupils' personal data where it is lawful, secure and ethical to do so. Where these conditions are met, the law allows the Department for Education (DfE) to share pupils' personal data with certain third parties, including:

- schools and 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 for Education's (DfE) 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 the Department for Education (DfE) to request access to individual level information relevant to detecting that crime.

For information about which organisations the Department for Education (DfE) 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>

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>

or

<https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>