

GDPR Privacy Policy

Status	Statutory
Version	4
Responsible Directors' Board	Audit and Risk Committee
Responsible Persons	Deputy CEO and Director of ICT
Date Policy Reviewed	July 2026
Next Review Date	September 2027
Academy to implement without Amendment, using appendix when required	



Summary of Changes from Previous Version

Version	Date	Author	Summary of Updates
V1	May 2023	Andy Hibbitt	New Policy
V2	August 2024	Wayne Kilner	Updated wording for clarity. Updated DPO contact details.
V3	July 2025	Legal	Updating policy to reflect the Data (Use & Access) Act 2025
V3	July 2026	Legal	Included Lawful Basis Table



Contents

Contents	3
Who We Are?	4
What is this Policy for?	4
Why the Trust/Academy needs to process personal data?	4
Lawful Basis for Processing Personal Data	5
Types of personal and special category collected and processed by the Trust/Academy.....	6
How the Trust/Academy collects data	6
Data retention	7
Data access and sharing	7
Staff Training and Awareness.....	8
Data safeguarding measures.....	8
Your rights	9



Who We Are?

Exceed Learning Partnership and its academies (listed on our website) ('we' or 'us' or 'our') gather and process your personal information in accordance with this privacy policy and in compliance with the relevant data protection Regulation and laws. This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your personal data.

Exceed Learning Partnership's registered office is at 6-9 Railway Court, Doncaster, South Yorkshire, DN4 5FB and we are a company registered in England and Wales under company number 10660150. We are registered on the Information Commissioner's Office Register; registration number ZA245663, and act as the Data Controller when processing your data.

Our designated Data Protection Officer/Appointed Person is Wayne Kilner, who can be contacted at DPO@elp.org.uk

What is this Policy for?

The purpose of this policy is to ensure that Exceed Learning Partnership complies with data protection legislation and protects the rights and freedoms of individuals whose personal data it processes.

This policy is intended to provide information about how the Trust/Academy will use (or "process") personal data about individuals including: its personnel, its current, past and prospective pupils and their parents, carers or guardians (referred to in this policy as "parents").

This policy constitutes a privacy notice as defined under UK GDPR Articles 13 and 14, providing individuals with transparent information on how and why their personal data is processed.

This information is provided in accordance with the rights of individuals under Data Protection Law to understand how their data is used. Trust/Academy personnel, parents and pupils are all encouraged to read the required Privacy Notice and understand the Trust's obligations.

This Privacy Notice runs alongside any other information the Trust/Academy may provide about a particular use of personal data, for example when collecting data via an online or paper form.

Why the Trust/Academy needs to process personal data?

In order to carry out its ordinary duties to staff, pupils and parents, the Trust/Academy may process a wide range of personal data about individuals as part of its daily operation. Some of this activity the Trust/Academy will need to carry out in order to fulfil its legal rights, duties or obligations.



In order to meet its obligations under the UK GDPR, the Data (Use and Access) Act 2025, and other legal instruments, the Trust/Academy relies on specific legal bases such as legal obligation, legitimate interest, or consent, depending on the processing activity including those in relation to the following:

- Article 6 and Article 9 of the GDPR
- Education Act 1996
- Section 70, 74, and 86 of Data (Use and Access) act 2025

In accordance with the above, we use data relating to pupils and their families for the following reasons:

- To support pupil learning
- To monitor and report on pupil progress
- To provide appropriate pastoral care
- To assess the quality of our service
- To comply with the law regarding data sharing
- To safeguard pupils

We use data relating to personnel for the following reasons:

- Enable the development of a comprehensive picture of the workforce and how it is deployed
- Inform the development of recruitment and retention policies
- Enable individuals to be paid

Lawful Basis for Processing Personal Data

Under the UK GDPR, the Trust/Academy must identify a lawful basis before processing personal data. The lawful basis relied upon will depend on the purpose of processing and the nature of the information being processed. The table below provides examples of the main processing activities undertaken by the Trust/Academy and the relevant lawful bases relied upon.

Processing Activity	Lawful Basis
Education provision and supporting pupil learning	Article 6(1)(e) – Public Task
Safeguarding pupils	Article 6(1)(c) – Legal Obligation and, where applicable, Article 6(1)(d) – Vital Interests
Payroll and employment administration	Article 6(1)(b) – Contract and Article 6(1)(c) – Legal Obligation
Processing health and medical information	Article 9(2) – Special Category Data Condition (for example, employment, health or substantial public interest conditions as applicable)



Processing Activity	Lawful Basis
Monitoring pupil progress and assessment	Article 6(1)(e) – Public Task
Attendance monitoring and reporting	Article 6(1)(c) – Legal Obligation
Recruitment and DBS checks	Article 6(1)(c) – Legal Obligation and Article 10 – Criminal Offence Data requirements
Communicating with pupils, parents and carers	Article 6(1)(e) – Public Task or Article 6(1)(f) – Legitimate Interests

Types of personal and special category collected and processed by the Trust/Academy

This will include by way of example:

- Personal information - e.g. names, addresses, telephone numbers, e-mail addresses, national insurance numbers; dates of birth, bank details, proof of identity and qualifications
- Characteristics - e.g. ethnicity, religion, language, nationality, country of birth and free school meal eligibility
- Admission and attendance information (such as sessions attended, number of absences and absence reasons)
- Pupil Progress (such as assessment information, Special Educational Needs, Behavioural information)
- Past, present and prospective student's academic, disciplinary, admissions and attendance records (including information relating to any special education needs);
- Relevant health and medical information, including contact details for next of kin
- Contract information (such as start dates, hours worked and salary information)
- Biometric data (for the purpose of accessing electronic equipment such as laptops and phones, processing school meal payments, releasing print jobs)

When undertaking DBS Checks, the Trust in addition to the above, will also process personal and sensitive data such as Driving Licence or Passport.

How the Trust/Academy collects data

The Trust/Academy primarily collects personal data directly from individuals, such as pupils and their parents, through various channels including online enquiry forms, emails, paper documentation, and regular interactions or communications. Additionally, personal data may be obtained from third



parties, including other Trusts/Academies, local authorities, or other professionals and authorities involved with the individual.

While most of the personal data provided to the Trust/Academy is mandatory for fulfilling our legal and operational obligations, some data is collected on a voluntary basis. During data collection, the Trust/Academy will clearly inform you whether the provision of specific data is mandatory or if your consent is required. When consent is necessary, the Trust/Academy will provide detailed and explicit information regarding the purpose of data collection and its intended use.

Data retention

In accordance with the GDPR, the Trust/Academy does not store personal data indefinitely; data is only stored for as long as is necessary to satisfy the purpose for which it was collected. Exceed Learning Partnership's Data Retention Policy identifies how long personal data is stored for.

Retention periods vary depending on the category of data and are set out in the Trust's Data Retention Policy, which is reviewed annually. These are aligned to the Information Records Management Society (IRMS) toolkit where appropriate.

Data access and sharing

Exceed Learning Partnership and its academies take your privacy seriously and employ comprehensive measures to protect your personal data. We implement multiple layers of security to safeguard your information from unauthorised access, alteration, disclosure, or destruction. These measures include advanced encryption methods to secure data during transmission and storage, techniques to anonymize data, restricted access protocols, robust IT authentication processes, and protective software such as firewalls and anti-virus programs. These security protocols ensure that your data remains confidential and secure at all times.

We only share personal data where there is a lawful basis to do so, including where required by law, necessary for safeguarding purposes, or where consent has been provided. Personal data will only be retained for as long as necessary to fulfil the purposes outlined in our privacy notices. Should you provide consent for us to share information related to school events, you may withdraw this consent at any time.

Most personal data collected by the Trust or its Academies will be handled internally and processed by authorised personnel in accordance with established access protocols. However, we also collaborate with third-party professional services to support our operations and maintain high standards of service and security. These third parties include:

- **Educational Institutions:** Information on pupils' next destinations after leaving us to ensure a smooth transition.
- **Local Authorities:** To comply with regulatory requirements and facilitate necessary services.
- **Healthcare Providers (NHS):** To ensure the well-being and safety of our pupils.
- **The Department for Education (DfE):** For statutory data collections and educational policy formulation.



We carefully select and engage with these third parties, ensuring they comply with stringent data protection standards and only use your data as directed by us.

Staff Training and Awareness

Exceed Learning Partnership recognises that effective data protection relies on all individuals who handle personal data understanding their responsibilities.

All staff handling personal data must complete appropriate data protection training and understand their responsibilities under this policy and relevant data protection legislation.

Staff are expected to:

- Handle personal data securely and confidentially;
- Only access personal data where they have an appropriate reason and authorisation;
- Follow Trust policies and procedures relating to data protection, information security and confidentiality;
- Report any suspected personal data breaches or concerns promptly to the appropriate person.

The Trust will provide appropriate guidance and training to ensure staff are aware of their data protection responsibilities and any changes in legal requirements or Trust procedures.

Data safeguarding measures

In accordance with Data Protection Law, some of the Trust's/Academies' processing activity is carried out on its behalf by third parties, such as IT systems, web developers, cloud storage and social media providers. Where possible this is subject to contractual assurances that personal data will be kept securely and only in accordance with the Trust or its Academies' specific directions.

All third-party processors are subject to due diligence and contractually bound to implement adequate technical and organisational safeguards, in line with Article 28 of the UK GDPR

The Trust/Academies are required by law to provide information to the DfE as part of statutory data collections, such as the academy census and the academy workforce return. This data-sharing underpins school funding and educational attainment policy and monitoring.

To find out more about the data collection requirements placed on us by the DfE (for example, via the academy census) please visit the following website:

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>

The National Pupil Database (NPD) is owned and managed by the DfE and contains information about pupils in schools in England. The law that allows this is the Education (Information about Individual Pupils) (England) Regulations 2013. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.



To find out more about the NPD, please visit the following website:

<https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

The DfE may share information about our pupils from the NPD with third parties who promote the education or wellbeing of children in England by:

- Conducting research and analysis
- Producing statistics
- Providing information, advice or guidance

The DfE has robust processes in place to ensure that the confidentiality of our data is maintained, and there are stringent controls in place regarding access and use of the data. Decisions on whether the DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- Who is requesting the data
- The purpose for which it is required
- The level and sensitivity of data requested and
- The arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements, retention and use of the data.

For more information about the DfE's data sharing process, please visit the following website:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided pupil information to, (and for which project), please visit the following website:

<https://www.gov.uk/government/publications/national-pupil-database-requests-received>

To contact the DfE go to the following website: <https://www.gov.uk/contact-dfe>

Your rights

Under GDPR, Individuals have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to a child's educational record, contact the Chief Privacy Officer (Academy Business Manager) in the academy who will work with the Data Protection Officer for the Trust, see details below: -

Individuals also have the right to:

- Be informed about how the Trust or its Academies use their personal data
- Request access to the personal data that the Trust or its Academies hold
- Request that your personal data is amended if it is inaccurate or incomplete



- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Request that personal data is erased where there is no compelling reason for its continued processing
- Request that the processing of your data is restricted

Where the processing of your data is based on your consent, you have the right to withdraw this consent at any time.

If you have a concern about the way Exceed Learning Partnership or its academies and/or DfE is collecting or using your personal data, you can raise a concern with us in the first instance or to the Information Commission.

An individual wishing to access or amend their personal data should put their request in writing to the Chief Privacy Officer (Academy Business Manager) in the academy or to the Data Protection Officer at DPO@elp.org.uk

If you request a copy for all your personal data, the school is required to carry out a reasonable and proportionate search. This means that not all personal data may be provided, especially if the request is very broad. To help us respond effectively, we encourage you to be as specific as possible about the information you are seeking.

Please also note that while we aim to respond within one month, this deadline may be extended by up to two additional months if the request is complex or excessive. We will inform you if an extension is necessary.

You should also be aware that certain data is exempt from the right of access. This may include information that identifies other individuals.

If you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You also have the right to request erasure of your personal data or to restrict processing (where applicable) in accordance with the data protection laws; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

ICO's guidance on individual rights is available at: <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/individual-rights/>

Policy Reviewed July 2026

Signed Chief Executive:

Signed: Chair of Directors:

Policy to be reviewed in September 2027