

Paradigm Trust – Pupil Privacy Notice (Revised 2026)

Who we are

Paradigm Trust is the Data Controller for the personal data we hold about pupils and their families. This means we determine how and why your personal data is processed. Our Data Protection Officer (DPO) oversees our data protection procedures to ensure we are compliant with UK GDPR.

- **Email:** dpo@paradigmtrust.org
- **Telephone:** 020 7364 1010

Why we collect and use pupil information

We collect and use pupil data for the following purposes:

- **Teaching and Learning:** To support classroom instruction and provide tailored educational support.
- **Progress and Attainment:** To monitor, track, and report on educational performance.
- **Pastoral Care & Safeguarding:** To ensure the health, safety, and well-being of every pupil.
- **Statutory Requirements:** To meet legal obligations for data sharing with the Department for Education (DfE) and Local Authorities.
- **Communication:** To keep parents and carers informed about school life and their child's progress.

The lawful basis we rely on

We process personal data under the following sections of the UK GDPR:

- **Article 6(1)(c) - Legal Obligation:** Processing is necessary to comply with the law (e.g., the Education Act 1996).
- **Article 6(1)(e) - Public Task:** Processing is necessary to perform a task in the public interest (delivering education).

For Special Category Data (more sensitive info like ethnicity or medical needs), we rely on:

- **Article 9(2)(g) - Substantial Public Interest:** Specifically for statutory requirements and safeguarding.
- **Article 9(2)(h) - Health and Social Care:** For providing medical support and SEND services.

What data do we collect?

The categories of information we process include:

- **Personal details:** Name, address, date of birth, and unique pupil numbers. This also

includes contact details for designated emergency contacts.

- **Characteristics:** Ethnicity, language, nationality, and free school meal eligibility.
- **Attendance:** Sessions attended, number of absences, and reasons for absence.
- **Assessment:** National curriculum results, internal testing, and progress reports.
- **Medical & Safeguarding:** Health conditions, allergies, and records of safeguarding concerns.
- **Special Educational Needs (SEND):** Descriptions of needs and support plans.
- **Behavioural:** Exclusion records and behavioural incidents.
- **Visual & Biometric (where applicable):** School photographs, promotional media (with explicit consent), CCTV images used for security, and biometric data (e.g., fingerprints) used for automated cashless catering or library systems.

Mandatory vs. Voluntary Information: While the majority of the personal data you provide to the Trust is a legal or contractual requirement to ensure your child's education, some is provided voluntarily. When collecting data, the Trust will explicitly inform you whether you are required to provide it, or if your separate consent is required (such as for marketing photographs or biometric systems).

Our Systems and Data Flow

We use a Management Information System (MIS), currently Bromcom, as our central record for all pupil and parent/carer data. To support learning and efficient school operations, we use an integration service called Wonde to securely share necessary data from Bromcom with approved educational platforms.

For Safeguarding, we use CPOMS to record and manage all safeguarding and pastoral concerns securely.

For Medical data we use Medical Tracker to record and manage all medical needs and to report first aid incidents.

Sharing pupil information

We routinely share pupil data with:

- **Schools** that pupils attend after leaving the Trust.
- **Local Authorities** (for statutory reporting and SEND support).
- **The Department for Education (DfE)** via the National Pupil Database (NPD).
- **Health Services** (such as the NHS for immunisation programs).

The National Pupil Database (NPD)

The NPD is owned and managed by the DfE. We are required by law to provide information about our pupils to the DfE as part of statutory data collections (the school census). For more information about how the DfE uses and shares this data, please see the NPD User Guide and Supporting Information and how the DfE collects and shares

research data.

Youth Support Services (Pupils aged 13+)

Once pupils reach the age of 13, we are legally required to share certain information with the local authority or youth support services (under section 507B of the Education Act 1996).

- **Your Right to Limit Sharing:** A parent/carer (or the pupil once they are 13 or older) can request that only the pupil's name, address, and date of birth be shared. To exercise this right, please contact the Trust DPO.

Third-party systems

To provide a modern and effective education, we use several third-party systems. Your data is only shared with these providers where necessary for their specific function. These categories include:

- **Learning & Revision Platforms:** Including AI-powered adaptive learning (e.g., Century Tech) and subject-specific tools (e.g. Sparx Maths, TTRS).
- **Medical & Health Management:** Systems used to track pupil allergies, medical conditions, and first aid incidents (e.g Medical Tracker)
- **SEND Management:** Software to manage individual learning plans and additional needs records (e.g. Edukey).
- **Assessment & Data Analysis:** Tools to help teachers spot gaps in learning and benchmark against national data.
- **Communication & Engagement:** Platforms for parent newsletters and pupil questionnaires.
- **Operational Services:** Including library management, cashless catering, and IT identity management.

A comprehensive, live register of all specific third-party applications utilised by our academies is maintained within the Trust's formal Record of Processing Activities (ROPA) and can be requested from the DPO.

International Transfers

Some of our service providers may process data outside the UK. Where this happens, we ensure appropriate safeguards (such as Standard Contractual Clauses approved by the UK Information Commissioner's Office) are in place to protect your information.

How long do we keep data?

We do not keep data indefinitely. We retain pupil records in line with the Trust's formal retention schedule set out in our ICT and Document Retention policies. Typically, standard pupil records are securely retained until a child reaches the age of 25 (or longer where strictly required by specific safeguarding legislation), in accordance with

the Information and Records Management Society (IRMS) Toolkit for Schools.

Your Rights

Under data protection law, parents and pupils have the following fundamental rights:

- **Be informed** about how we use your data.
- **Access** the data we hold (Subject Access Request).
- **Rectify** any inaccuracies in the data.
- **Request Erasure** (in certain circumstances).
- **Restrict or Object** to processing.
- **Data Portability** (to request the transfer of your digital data to another provider in specific scenarios).

Where the processing of data is based on your explicit consent, you retain the right to withdraw that consent at any time.

Complaints

If you have a concern, please contact our DPO first:

- **Email:** dpo@paradigmtrust.org
- **Telephone:** 020 7364 1010

You also have the right to complain directly to the Information Commissioner's Office (ICO):

- **Website:** <https://www.ico.org.uk>
- **Telephone:** 0303 123 1113