Privacy Notice for Pupils, Residents and Parents

Reference Number	A65.1b
Version Number:	7
Approved by:	The Data Protection Committee
Implementation date:	April 2026
Next review due by:	April 2027

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This privacy notice describes how we collect, use and process personal information about you during and after your working relationship with us, in accordance with UK data protection law.

UK data protection law currently comprises the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Data (Use and Access) Act 2025, each as amended from time to time.

Following the UK's departure from the European Union, the UK GDPR forms part of the domestic data protection framework. The UK GDPR sits alongside the Data Protection Act 2018 and the Data (Use and Access) Act 2025, which supplement and tailor the UK data protection regime, including provisions relating to regulatory powers, enforcement and specific processing activities.

The EU General Data Protection Regulation (Regulation (EU) 2016/679) continues to apply within the European Union and is referred to in this notice as the "EU GDPR" where relevant.

Who Collects This Information

The Aurora Group is a "data controller." This means that we are responsible for deciding how we hold and use personal information.

To run our schools and homes and help learning and achievement, the Aurora Group collects, stores and uses information about parents, children / young adults and residents. In this document the Aurora Group is referred to as 'We' or 'Ours'. Parents, children and residents are referred to as 'You' or 'Your'.

Categories of Information We Collect, Process, Hold and Share about Parents, Pupils and Residents

- Personal information such as name, pupil number, date of birth, gender and contact information;
- Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses;
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility);
- Attendance details (such as sessions attended, number of absences and reasons for absence);
- Performance and assessment information;
- Behavioural information (including exclusions);
- Special educational needs information;
- Relevant medical information;
- Special categories of personal data (including ethnicity, relevant medical information);
- Images of pupils engaging in school activities, and images captured by the School's CCTV system;
- Information about the use of our IT, communications and other systems, and other monitoring information;
- Financial details;
- Recordings of pupils and/or parents from the School's video conferencing platform;

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Collecting this Information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the UK General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

How We Use Your Personal Information

We hold pupil/resident data and use it for:

- Pupil/resident selection (and to confirm the identity of prospective pupils/residents and their parents);
- Providing education services and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Informing decisions such as the funding of schools/ care homes;
- Assessing performance and to set targets for schools and care homes;
- Safeguarding pupils' and residents' welfare and providing appropriate pastoral (and where necessary medical) care;
- Support teaching and learning;
- Giving and receive information and references about past, current and prospective pupils and residents, and to provide references to potential employers of past pupils;
- Managing internal policy and procedure;
- Enabling pupils to take part in assessments, to publish the results of examinations and to record pupil achievements;
- To carry out statistical analysis for diversity purposes;
- Legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care;
- Enabling relevant authorities to monitor the service's performance and to intervene or assist with incidents as appropriate;
- Monitoring use of the Aurora Group's IT and communications systems in accordance with the Aurora Group's IT security policy;
- Making use of photographic images of pupils in Aurora publications, on the Aurora website and on social media channels;
- Security purposes, including CCTV;
- Where otherwise reasonably necessary for the Aurora Group's purposes, including to obtain appropriate professional advice and insurance.

The Lawful Bases on which we use this Information

We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- **Consent** – Where you (or your parent/carer) have given us clear permission to use personal information for a specific purpose. Consent can be withdrawn at any time.
- **Contract** – Where processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract.
- **Legal obligation** – Where we must process personal information to comply with the law.

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- **Vital interests** – Where processing is necessary to protect someone's life or keep them safe.
- **Public task** – Where we need to process personal information to carry out our official functions as a school in the public interest or in the exercise of official authority.
- **Legitimate interests** – Where processing is necessary for our legitimate business interests and we have ensured it does not override the rights and freedoms of individuals.
- **Recognised legitimate interests (DUAA 2025)** – In certain limited circumstances, the law recognises specific activities as being in the legitimate interests of a public body without requiring a separate balancing test. Where applicable, we may rely on this lawful basis as clarified under the Data (Use and Access) Act 2025.

School Census and statutory returns

We are required by law to provide information about our pupils to the Department for Education (DfE) as part of the school census.

This is carried out under our **legal obligation** and **public task** duties, including requirements set out in the Education Act 1996 and associated regulations.

The census takes place once a year and helps the government to:

- Plan and fund education services
- Monitor school performance
- Develop education policy

Further information about the school census is available on the GOV.UK website by searching for "School census".

Sensitive personal information (as defined under the UK GDPR as "special category data") require higher levels of protection and further justification for collecting, storing and using this type of personal information.

How We Use Particularly Sensitive Information

Sensitive personal information (as defined under the UK GDPR as "special category data") require higher levels of protection and further justification for collecting, storing, and using this type of personal information. We may process this data in the following circumstances:

- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations in line with our data protection policy;
- Where it is needed in relation to legal claims or where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent

Sharing Data

We may need to share your data with third parties where it is necessary. There are strict controls on who can see your information. We will not share your data if you have advised us that you do not want it shared unless it's the only way we can make sure you stay safe and healthy, or we are legally required to do so.

We share pupil information with:

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- the Department for Education (DfE) - on a statutory basis under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013;
- Ofsted;
- Care Quality Commission;
- Other Schools that pupils have attended/will attend;
- NHS;
- Welfare services (such as social services);
- Law enforcement officials such as police, HMRC;
- Local Authority Designated Officer;
- Professional advisors such as lawyers and consultants;
- Support services (including insurance, IT support, information security);
- Third-party software providers and providers of learning software
- The Local Authority.
- other schools/services within the Aurora Group;

Recently the Department for Education have requested more regular data sharing on pupil attendance to help support those vulnerable and to assist with intervention strategies.

Information will be provided to those agencies securely or anonymised where possible.

The recipient of the information will be bound by confidentiality obligations; we require them to respect the security of your data and to treat it in accordance with the law.

We may share limited personal data with prospective buyers or advisors if the business or part is sold or merged. Any data shared will be protected and used only for that purpose.

We may transfer your personal information outside the UK and the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

We do not share information about our pupils with anyone without consent unless otherwise required by law.

Why we Share this Information

For example, we share students' data with the DfE on a statutory basis which underpins school funding and educational attainment. To find out more about the data collection requirements placed on us by the DfE please go to https://www.gov.uk/education/data-collection-and-censuses-for-schools.

Storing Pupil Data

The Aurora Group keep information about pupils on computer systems and sometimes on paper.

Except as required by law, the Aurora Group only retains information about pupils for as long as necessary in accordance with timeframes imposed by law and our internal policy.

Full details on how long we keep personal data for is set out in our data retention policy, this is available upon request.

Automated Decision Making

Automated decision-making takes place when an electronic system uses personal information to decide without human intervention. We are allowed to use automated decision making in limited circumstances.

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Pupils and residents will not be subject to automated decision-making, unless we have a lawful basis for doing so and we have notified you.

If automated decisions are ever used, you will have the right to ask for human review, challenge the decision, and request an explanation of how it was made.

Retention Periods

Except as otherwise permitted or required by applicable law or regulation, the Aurora Group only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

Information about how we retain information can be found in our Data Retention policy. This can be provided upon request.

Security

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way).

Requesting Access to your Personal Data

Under data protection legislation, 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 be given access to your child's education record, contact the Data Protection Officer.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

If you want to request information, please see our Subject Access Request Process annexed to our Data Protection Policy, for the procedures we take.

Right to Withdraw Consent

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Contact

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, you can contact the Data Protection Officer (DPO) on the details below:

Data Protection Officer: Marie Turner
Tel: 020 3617 0170

The Aurora Group,
Unit 13, Twigworth Court Business Centre,
Tewkesbury Road, Gloucester, GL2 9PG
Email: Marie.Turner@the-aurora-group.com

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How to Raise a Concern

If you have any concerns about how we handle your personal data, we encourage you to contact us in the first instance so we can try to resolve the issue.

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues.

- Report a concern online at https://ico.org.uk/concerns/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

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