Privacy Notice

This privacy notice describes how we collect and use personal information about pupils, in accordance with the UK General Data Protection Regulation (UK GDPR), section 537A of the Education Act 1996 and section 83 of the Children Act 1989.

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) was incorporated into UK law as retained EU law and is now known as the UK GDPR. The UK GDPR operates alongside the Data Protection Act 2018, which supplements it by setting out additional provisions on matters such as the processing of personal data in specific sectors, exemptions, the powers of the Information Commissioner, and enforcement. The Data (Use and Access) Act 2025 further amends both the UK GDPR and Data Protection Act 2018 to modernise UK data protection rules and clarify certain rights and obligations. The GDPR continues to apply within the EU and to organisations that process personal data of individuals located in the EU.

This notice applies to all pupils and parents.

Who Collects This Information

The BRIT School is a "data controller" of personal data and gathers and uses certain information about pupils and parents. This means that we are responsible for deciding how we hold and use personal information about pupils and parents. Under data protection legislation, we are required to notify you of the information contained in this privacy notice.
This notice does not form part of any contract to provide services and we may update this notice at any time.
It is important that you read this notice with any other policies mentioned within this privacy notice, so that you are aware of how and why we are processing your information, what your rights are under data protection legislation and the procedures we take to protect your personal data.

Data Protection Principles

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

The categories of pupil information that we collect, hold, and share.

We may collect, store and use the following categories of personal information about you:

Personal Data:

- **Personal information:** 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;
- **Attendance details** (such as sessions attended, number of absences and reasons for absence);
- **Assessment Information:** results, comments, feedback, examination information and results
- **Photographic & Video Footage:** Used for assessment and examination evidence, as well as in work produced by the pupil directly – images and footage created for this purpose will not be shared publicly or used for marketing and advertising without your specific consent. Please see our 'Data Protection Policy: Student image – Photography & Video' document for further information. This can be found in the Data Protection section of our website (https://www.brit.school/dataprotectionpolicy)
- **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**; anything disclosed during the application process and payments made through the schools Payment System WisePay
- **Post 16 learning information**;
- **Recordings of pupils and/or parents** from the school's video conferencing platform; Google Meet and Parents Evening System.

Sensitive Personal Data:

- **Characteristics:** date of birth, ethnicity, language, nationality, country of birth, free school meal eligibility, English as a Foreign Language, Pupil Premium eligibility
- **Examination Data:** Candidate Number, ULN, UCI, Examination entries marks and candidate statements
- **Medical Information**: relevant conditions, treatments, allergies, medication
- **Special Educational Needs (SEN) Information:** assessment, provision, needs, and statement, Educational Healthcare Plans (EHCP).
- **Behavioural Information:** exclusions, measures, concerns
- **Child Protection Information:** reports, investigations, and outcomes of any child protection concerns

Sensitive Personal Data provided on a voluntary basis:

Child Adolescent and Mental Health Services (CAMHS): EWO, Social Worker, Guidance Clinic

Children in Care/Living Independently: Nature of care/living, contact, or borough information

Data is collected from the Pupil and/or Parent/Guardian when applying to The BRIT School. Additional data is collected if an applicant is successful.

How We Collect this Information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. 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 relationship with us.

How and Why We Use Your Personal Information

We will only use your personal information when the law allows us to do so. Most commonly, we will hold pupil data and use it for:

- Pupil selection (and to confirm the identity of prospective pupils 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;
- Assessing performance and to set targets for schools;
- Safeguarding pupils' 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 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 school's performance and to intervene or assist with incidents as appropriate;
- Monitoring use of the school's IT and communications systems in accordance with the school's IT security policy;
- Making use of photographic images of pupils in school publications, on the school website and on social media channels;
- Security purposes, including CCTV; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.
- To provide support to pupils after they leave the school as alumni.

The categories of Parent/Guardian information that we collect, hold and share:

Personal Data: Primary and Secondary contact - name, address, telephone number(s), email address; relationship to pupil, alternative/nominated emergency contact(s); your occupation and professional activities, philanthropic activity and memberships; records of pledges, donations and Gift Aid status, where applicable (as required by HMRC); information about your wealth, including net worth; media articles about you; Details of businesses you are or were a Director of.

Sensitive Personal Data: Date of Birth*, National Insurance Number**, Bank details including, bank account number, sort code and account name. For the purpose of processing school fee payments and issuing relevant refunds.

CCTV Images

The BRIT School uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings in order to provide a safe and secure environment for pupils, staff, and visitors, and to prevent the loss or damage to school property.

Please refer to our CCTV Policy for further information. This can be found by clicking here.

Why do we collect and use your data?

We use the pupil data to:

- Support pupil learning;
- Monitor and report on pupil progress;
- Provide appropriate pastoral care;
- Assess the quality of our services;
- Enable examination reporting and results;
- Maintain contact and notifications for work and assignments.
- Communicate on performances and all other creative and performing arts services provided by the school;
- Comply with the law regarding data sharing, including sharing for School Census

We use the parent/guardian data to:

- Comply with the law regarding data sharing
- Report on pupil progress;
- Provide appropriate pastoral care;
- Research potential to give to the school and collect additional details relating to employment and philanthropic activity;
- Communicate on pupil's learning progress, behaviour, attendance, pastoral support;
- Communicate on performances and all other creative and performing arts services provided by the school;
- To Process Free School Meal applications and evaluate eligibility (Parent *Date of Birth and **National Insurance Number is required to process this application).

The lawful basis on which we collect and 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: 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; and
- The Education Act 1996: for Departmental Censuses 3 times a year. More information can be found at: https://www.gov.uk/education/data-collection-and-censuses-for-schools.

We need all the categories of information in the list above primarily to allow us to comply with legal obligations. Please note that we may process information without knowledge or consent, where this is required or permitted by law.

How we use particularly sensitive personal information

Special categories of particularly sensitive personal information, such as information about your health, racial or ethnic origin, sexual orientation, or biometrics require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information 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 the public interest, such as for equal opportunities monitoring.
- Where it is necessary to protect you or another person from harm.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Sharing Data

Pupil Information Sharing

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:

- the Department for Education (DfE) - on a statutory basis under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013;
- Ofsted;
- 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);
- Providers of learning software such as [e.g., Wonde, Softlink Oliver, Boost, GCSEPod, Kerboodle, MyMaths, PiXEL, Renaissance and Century Tutoring];
- Google Class Tools
- The Local Authority.
- Youth support services – under section 507B of the Education Act 1996, to enable them to provide information regarding training and careers as part of the education or training of 13–19-year-olds;
- Examining and Awarding Bodies such as AQA, Pearson/Edexcel, WJEC, UAL

The Department for Education requests regular data sharing on pupil attendance to help support those vulnerable students and to assist with intervention strategies. Further information on how the Department for Education collects this data will be made available on the school website.

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 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.

For data shared outside of the EEA, please contact student services: studentservices@brit.croydon.sch.uk

Please note that it is technically possible for the hosted systems (listed above) to be accessed by employees of the school from outside the EEA. Should this be a concern, please contact the Data Protection Officer using the details at the end of this document, or by emailing dpo-brit@brit.croydon.sch.uk.

Collecting & Storing Pupil Information

Whilst the majority of pupil 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.

We hold pupil's Educational Record in secure digital and physical storage. We will retain records up to and until August following a pupil's 25th Birthday (Date of Birth of the pupil + 25 years + months remaining until August). For an exhaustive list of retention periods, please refer to The BRIT School Data Retention Schedule, which can be found on our website: https://www.brit.school/keyinformationandpolicies.

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). In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. Details of these measures are available in the School's Data Protection policies located on the school's website: https://www.brit.school/dataprotection. The school keeps information about pupils on computer systems and sometimes on paper.

You can find further details of our security procedures within our Data Breach policy and our Information Security policy, which can be found https://www.brit.school/dataprotection.

It is important that the personal information we hold about you is accurate and current. Please keep us information if yours or your

child's personal information changes while your child attends our school.

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.

We share pupils' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

We are required to share information about our pupils with our local authority (LA) and the Department for Education (DfE) under section 3 of The Education (Information about Individual Pupils) (England) Regulations 2013.

Pupils aged 13+

Once our pupils reach the age of 13, we also pass pupil information to our local authority and / or 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. We must provide the pupils name, the parents name(s) and any further information relevant to the support services role.

This enables them to provide services as follows:

- youth support services
- careers advisers

A parent or guardian can request that only their child's name, address and date of birth is passed to their local authority or provider of youth support services by informing us. This right is transferred to the child / pupil once he/she reaches the age 16.

Pupils aged 16+

We will also share certain information about pupils aged 16+ with our local authority and / or 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.

This enables them to provide services as follows:

- post-16 education and training providers
- youth support services
- careers advisers

For more information about services for young people, please visit our local authority website: https://www.croydon.gov.uk/young-croydon

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. 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.

We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013.

To find out more about the NPD, go to
https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information.

The department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether 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 the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit: https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

For information about which organisations the department has provided pupil information, (and for which project), please visit the following website: https://www.gov.uk/government/publications/national-pupil-database-requests-received

To contact DfE: https://www.gov.uk/contact-dfe

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], please refer to our Data Protection Policies available on the School's website: https://www.brit.school/dataprotection.

School Fundraising, Wealth Screening & Donor Management

The school will, from time-to-time and for limited and specific purposes only, contact parents by post regarding fundraising and voluntary opportunities to donate to the ongoing delivery of the arts at the BRIT School. This category of communication will be limited to no more than three letters in an academic year and will be restricted to postal delivery.

We may carry out wealth screening, a process which uses trusted third-party partners to automate some of this work. We may use information gathered from the sources listed under 'exactly how we use your data and what data we hold'. *See Addendum 1 – Pupil and Parent Privacy Notice – Wealth screening, on our website for further information by clicking here.*

Where email is used to communicate regarding fundraising and donations, we will rely on consent, unless included in a newsletter informing the recipient of news and events at the school, where the allocations of donations and the opportunity to donate may be referred to.

The BRIT School will collect, hold and process personal data under the following lawful basis, with the understanding that parents would reasonably expect the school to process their data for this purpose:

- ***processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.***

You may, at any time, request that the school no longer process your data for this purpose, by contacting the Data Protection Coordinator (dpo-brit@brit.croydon.sch.uk).

System Used for Processing Pupil and Parent/Guarding Data

	PUPIL DATA	PUPIL SENSITIVE DATA	PARENT/GUARDIAN DATA
iSAMS (school management information system (MIS))	✔	✔	✔
SISRA (performance data analysis)	✔	✔	
CPOMS (child protection and safeguarding system)	✔	✔	
Microsoft office 365 (cloud based email system)	✔		
Google for education (learning management system)	✔	✔	
Applicaa Admissions+ (Application form file management) – on premise hosting	✔	✔	✔
Groupcall (Communication, data and identity management)	✔	✔	
Donor management - Salesforce	✔	✔	
School Lockdown App (emergency lockdown and broadcast system)	✔		

HOW WE USE YOUR DATA

Parent Information Sharing

The table below provides a detailed overview of the information that we collect and share and the purpose for collecting that information.
We will NEVER sell your data or pass it on to 3rd parties for marketing purposes. We will only transfer data to 3rd parties who are acting as our agents with a data sharing agreement in place.

DATA PROVIDED TO/FROM THIRD-PARTIES WITHIN THE EU

HMRC	Claiming gift Aid and compliance

DATA PROVIDED TO/FROM THIRD-PARTIES OUTSIDE THE EU

Mail Chimp	Used or emailing and communications
Non-UK tax bodies	Under legal requirements under the relevant local law where donations are provided.

PUBLIC SOURCES OF INFORMATION

LinkedIn and other social media sites	Provides personal details, contact information and business details. To maintain our obligation to keep accurate records and assist with prioritising parent engagement and fundraising activities.
Companies house	Provides details of directorships, past and current, in addition to contact details. To maintain our obligation to keep accurate records and assist with prioritising alumni engagement and fundraising activities.
Electoral Register	To confirm address details, under our obligation to maintain accurate records and assist with prioritising alumni and fundraising activities.
Search Engines E.G. Google, Yahoo, Bing	To confirm address details, under our obligation to maintain accurate records and assist with prioritising alumni and fundraising activities.

WEALTH SCREENING

Factary	Independent research agency and consultancy for the non-profit sector, providing research, due diligence and wealth screening services.
Prospecting for Gold	Provides research, wealth screening, consultancy and training support to charities of all sizes.
Wealth Engine	Research services firm for non-profit organisations and financial services companies.
News: Ft Online, Google Alerts, Factiva	To update information where relevant

Automated Decision Making

Automated decision making takes place when an electronic system uses personal information to make a decision without human intervention. We are required to ensure that appropriate safeguards are in place when using automated decision making for significant decisions and the circumstances in which we are permitted to use special category data (sensitive information) in automated decision making are limited.

You will not be subject to automated decision making for significant decisions unless we have a lawful basis, and a valid condition where required, for doing so and appropriate safeguards are in place. Appropriate safeguards include informing the relevant individuals about the automated decision making and their rights to request a human review, express their views, and contest the decision.

Retention Periods

Except as otherwise permitted or required by applicable law or regulation, the school 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.

The data retention periods are as follows:

Pupil Educational Record (pupil file):	Date of Birth of the pupil + 25 years
Examination Results:	Held on pupil file - Date of Birth of the pupil + 25 years
Child Protection Information:	Held on pupil file - Date of Birth of the pupil + 25 years
Attendance Registers:	Preserved for a period of 3 years after the date on which the entry was made Relating to authorised absence – current academic year + 2 years
Special Educational Needs:	Held on pupil file - Date of Birth of the pupil + 25 years
Implementation of Curriculum:	Schemes of work, timetables, class record, mark books, record of homework – Current year + 1 year
Pupils' Work:	Where possible, pupils' work will be returned to them at the end of the academic year. In some circumstances, we may retain pupils' work for no longer than current year + 1 year

For further information regarding the school's retention period please see 'The BRIT School Records Management Policy' in the Data Protection section of our website (https://www.brit.school/dataprotection)

Your Rights of Access, Correction, Erasure and Restriction

Under certain circumstances, by law you have the right to:

- Access your personal information (commonly known as a "subject access request"). This allows you to receive a copy of the personal information we hold about you and to check we are lawfully processing it. You will not have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.
- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it.
- Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
- To object to processing in certain circumstances (for example for direct marketing purposes).
- To transfer your personal information to another party.

If you want to exercise any of the above rights, please contact the Data Protection Coordinator (dpo-brit@brit.croydon.sch.uk) in writing.

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).

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance, by contacting the Data Protection Coordinator (dpo-brit@brit.croydon.sch.uk).

Alternatively, you can contact the Information Commissioner's Office at https://ico.org.uk/concerns/

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 Coordinator (dpo-brit@brit.croydon.sch.uk) in writing. 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, we request that you raise your concern with the Schools Data Protection Coordinator in the first instance. We will acknowledge receipt of your complaint within 30 calendar days, and we will investigate and respond without undue delay. Further information about the way we handle data protection complaints can be found in our Data Protection Policy, available on our website.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by the Data Protection Coordinator, then you can contact the DPO on the details below:

Data Protection Officer:	Judicium Consulting Limited
Address:	5th Floor, 98 Theobalds Road, London, WC1X 8WB
Email:	dataservices@judicium.com
Web:	www.judiciumeducation.co.uk

Should you remain dissatisfied with our response, you also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Appendix:

1. The Data Protection Act 2018 - http://www.legislation.gov.uk/ukpga/2018/12/contents/enacted
2. The General Data Protection Regulation - https://gdpr.eu/
3. Addendum 1 – Pupil and Parent Privacy Notice – Wealth Screening – https://www.brit.school/privacy
4. The Information Commissioner's Office (ICO) concerns - https://ico.org.uk/concerns/

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.