WHITE HOUSE SCHOOL

Privacy Notice for Pupils and Parents

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CAVENDISH EDUCATION

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1. Context

The White House School is an independent specialist school for children and young people with additional and complex needs. We are part of Cavendish Education and are committed to transforming lives through highly personalised education, therapeutic support and ambitious teaching.

Our vision is **"Making Learning Possible Again."** We create a school where pupils feel safe, belong, achieve and thrive. Through removing barriers to learning, rebuilding confidence and fostering positive relationships, we empower every pupil to realise their potential and prepare for successful and fulfilling lives beyond school.

Our mission is to provide a nurturing, ambitious and mindful education that supports both academic progress and personal growth. Guided by our whole-school ethos of **Healthy Minds, Happy Hearts**, we create the conditions for every pupil to become **Ready to Learn and Prepared for Life**.

Everything we do is underpinned by our core values:

- **Ambition** – developing curiosity, courage and aspiration.
- **Resilience** – developing confidence, character and perseverance.
- **Community** – demonstrating kindness, integrity and respect.

We believe that pupils thrive when they feel safe, understood and valued. Our culture is built upon strong relationships, high expectations and a commitment to seeing the strengths and potential in every child. We are deeply nurturing without lowering expectations and remain unashamedly ambitious for every pupil.

Our practice is informed by the National Autistic Society's **SPELL Framework**, which promotes:

- Structure and predictability;
- Positive approaches and expectations;
- Empathy and understanding;
- Low arousal environments;
- Strong links between school, home and professionals.

Alongside this, we adopt a trauma-informed, relational and therapeutic approach across all aspects of school life. We recognise that behaviour is a form of communication and believe that pupils do well when they can. Our role is to understand the barriers they face and provide the support, strategies and relationships that enable them to succeed.

At The White House School:

- Every interaction is viewed as an intervention.
- Every adult is an emotionally available adult.
- Relationships come first.
- Emotional readiness is the foundation for learning.

We support pupils to develop emotional regulation, communication, independence and social understanding through consistent relational practice, personalised support and integrated therapeutic approaches. Emotional regulation is explicitly taught through co-regulation, sensory support, movement opportunities and personalised regulation strategies. Pupils are encouraged to understand themselves, develop resilience and build the skills needed to navigate life successfully.

Safeguarding is at the heart of everything we do. We recognise the additional vulnerabilities that many pupils with special educational needs may experience and maintain a culture of vigilance, care and advocacy. We place the child at the centre of decision-making, listen to pupil voice in all its forms and work closely with families and external agencies to promote safety, wellbeing and positive outcomes.

Through ambitious and adapted teaching, meaningful relationships, therapeutic support and a culture of belonging, we help pupils feel safe, build confidence, achieve success and thrive both in school and beyond.

2. Introduction

Under UK data protection law, individuals have a right to be informed about how our school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about pupils at school, like you.

We, The White House School, are the 'data controller' for the purposes of UK data protection law.

Our data protection officer is Caroline Chadwick, HR Manager (see section 16 for contact details).

3. Aims

This notice aims to:

- Ensure compliance with data protection legislation, including the UK GDPR and the Data Protection Act 2018.

- Inform applicants of their data protection rights and how to exercise them.
- Provide transparency regarding the lawful basis for processing personal data.
- Outline how long personal data will be retained and the criteria for determining retention periods.
- Clarify who has access to applicant data and under what circumstances it may be shared with third parties.
- Assure applicants that their personal data will be handled securely and confidentially.

4. Legislation and Guidance

This notice meets the requirements of the following legislation and guidance:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Human Rights Act 1998
- Information Commissioner's Office (ICO) Guidance on Privacy Notices, Transparency and Control
- ICO Employment Practices Guidance
- Government Digital Service (GDS) Privacy Notice Guidance

5. The Personal Data We Hold

We hold some personal information about you to make sure we can help you learn and look after you at school.

For the same reasons, we get information about you from some other places too – like other schools, the local council and the government.

Personal information that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

For all pupils	Personal Information	Name, Date of Birth, Gender, Year Group, Class, Address, Contacts Dietary needs, dietary preferences Medical practice address and telephone number Medical conditions
	Characteristics	Ethnicity, language, nationality, country of birth
	Attendance Information	Sessions attended, number of absences, reasons for absence
	Academic attainment and progress records	Teacher Assessment grades Statutory assessment results Standardised score results Learning journey evidence (photographs and annotations) Other photographic evidence of learning Reports to parents (mid-year and end of year)
	Other	Pupil Surveys Incidental evidence of pupils' successes (certificates, photographs, named trophies, celebration events)
For some pupils (only if applicable)	Other	Free School Meals eligibility Court Orders Other pupil premium eligibility (such as if the child is looked after) Safeguarding records (incidents, external agency reports Special Educational needs records (professional assessments, external professionals' reports, referrals for external support) Pastoral records (referrals for support both internal and external, notes of discussions with pupils, pupils' jottings of thoughts and feelings) Exclusion information Behaviour incident records
All Parents/Carers*	Personal Information	Names, addresses, telephone numbers, email addresses, relationship to the child (of parents/carers and other given contacts) Free school meals eligibility evidence
	Other	Parents' surveys Letters sent to school Emails sent to school Financial payments, including debt (both manual and electronic)

*this refers to those with legal responsibility for the child

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- Information about your characteristics, like your ethnic background or any special educational needs
- Information about any medical conditions you have
- Photographs and CCTV images

This list is not exhaustive, to access the current list of categories of information we process please contact the school.

6. Why We Use This Data

We use the data listed above to:

The personal data collected is essential, for the school to fulfil their official functions and meet legal requirements.
We collect and use pupil information, for the following purposes:

- To support pupil learning
- To keep informed to keep children safe
- To monitor and report on pupil progress
- Safeguarding pupils' welfare and providing appropriate pastoral (and where necessary medical) care
- Informing decisions such as the funding of schools
- Assessing performance and to set targets for schools
- 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
- To comply with the law regarding data sharing
- To meet the statutory duties placed upon us for DfE data collections

We use the parents' data:

- To assess the quality of our services
- To comply with the law regarding data sharing
- To ensure financial stability

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing pupil information are:
The lawful bases for processing personal data are set out in Article 6 of the UK General Data Protection Regulation. The school processed such data because we have:
(6a) Consent: parents have given clear consent for us to process their (and their child's) personal data for the purposes indicated above.

(6c) A Legal obligation: the processing is necessary for us to comply with the law (e.g. we are required by law to submit certain teacher assessment information and to safeguard pupils' welfare by sharing information with other agencies).
(6d) A duty to safeguard pupils: the processing is necessary in order to protect the vital interests of the data subject (children); (e.g. if we are required to share medical history information with emergency services in the event of an accident or to other agencies when a child may be in danger).
(6e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law (e.g. processing attendance information or academic attainment and progress records).
Special Categories of data are set out in Article 9 of the UK General Data Protection Regulation. The school processes under the following articles:
(9.2a) explicit consent. In circumstances where we seek consent, we make sure that the consent is unambiguous and for one or more specified purposes, is given by an affirmative action and is recorded as the condition for processing. Examples of our processing include use of pupil photographs for external purposes, pupil dietary requirements, and health information we receive from our pupils who require a reasonable adjustment to access our services.
(9.2b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment, social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.
(9.2c) where processing is necessary to protect the vital interests of the data subject or of another natural person. An example of our processing would be using health information about a pupil in a medical emergency.
(9.2f) for the establishment, exercise or defence of legal claims. Examples of our processing include processing relating to any employment tribunal or other litigation.
(9.2g) reasons of substantial public interest. As a school, we are a publicly funded body and provide a safeguarding role to young and vulnerable people. Our processing of personal data in this context is for the purposes of substantial public interest and is necessary for the carrying out of our role. Examples of our processing include the information we seek or receive as part of investigating an allegation.
(9.2j) for archiving purposes in the public interest. The relevant purpose we rely on is Schedule 1 Part 1 paragraph 4 – archiving. An example of our processing is the transfers we make to the County Archives as set out in our Records Management Policy.
We process criminal offence data under Article 10 of the UK GDPR.
Our Data Protection Policy highlights the conditions for processing in Schedule 1 of the Data Protection Act 2018 that we process Special Category and Criminal Offence data under.

7. 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 clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact Us' below).

8. Use of Your Personal Data in Automated Decision Making and Profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

9. Our Lawful Basis for Using this Data

Our lawful bases for processing your personal data for the purposes listed in section 6 above are as follows:

- For the purposes of the points in section 6 above, in accordance with the 'public task' basis – we need to process data to fulfil our statutory function as a school
- For the purposes of points in section 6 above, in accordance with the 'legal obligation' basis – we need to process data to meet our responsibilities under law
- For the purposes of points in section 6 above, in accordance with the 'consent' basis – we will obtain consent from you to use your personal data
- For the purposes points in section 6 above, in accordance with the 'vital interests' basis – we will use this personal data in a life-or-death situation
- For the purposes of points in section 6 above, in accordance with the 'contract' basis – we need to process personal data to fulfil a contract with you or to help you enter into a contract with us
- For the purposes of points in section 6 above, in accordance with the 'legitimate interests' basis – where there's a minimal privacy impact and we have a compelling reason.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

10. Our Basis for Using Special Category Data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to 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 data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing 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. Conditions include:

- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We have obtained your consent to use it in a specific way
- 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 data concerned has already been made manifestly public by you

- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

11. Collecting this Data

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

We collect pupil information via registration forms at the start of the school year or Common Transfer File (CTF) or secure file transfer from the previous setting.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals

12. Storing this Data

We keep personal information about you while you are attending our school. We may also keep it beyond your attendance at our school if this is necessary. Our GDPR Policy sets out how long we keep information for. A copy of this policy can be requested from the school office.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it.

We hold pupil data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please contact the school administrator or visit Policies | The White House

All confidential information is kept secure either on encrypted, password protected devices or paper copies kept on the school site. Once the deadline for retaining information has passed, data kept electronically is deleted and paper copies are destroyed in conjunction with the retention schedule. Please see our website for more information Policies | The White House

13. National Pupil Database

We have to provide information about you to the Department for Education (a government department) as part of data collections such as the school census.

Some of this information is then stored in the National Pupil Database, which is managed by the Department for Education and provides evidence on how schools are performing. This, in turn, supports research.

The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards and others.

The Department for Education may share information from the database with other organisations, such as organisations that promote children's education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data.

You can find more information about this on the Department for Education's webpage on how it collects and shares research data. You can also contact the Department for Education if you have any questions about the database.

14. Sharing this Data

We do not share information about you with any third party without consent unless the law and our policies allow us to do so. Where it is legally required or necessary (and it complies with UK data protection law), we may share personal information about you with:

- Local Authorities (BCP/Dorset etc) – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Government departments or agencies
- Any youth support services providers

- Our regulator, Ofsted
- Suppliers and service providers: - GL Assessment - Curriculum and assessment monitoring
- Financial organisations
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Schools that the pupil attends after leaving us
- The Department for Education (DfE)
- Standards and Testing Agency (STA)
- Children's Social Care (when safeguarding pupils' welfare)
- External professionals who visit school (such as Educational Psychologists)
- Law enforcement officials such as the Police
- The NHS
- Suppliers and service providers with whom we have a contract
- Cavendish Education

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 relevant legislation.

Department for Education (DfE)
The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. 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 those data collections, under:
Section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.
All data is transferred securely and held by the Department for Education (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.
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.

Standards and Testing Agency
We are required to share data with the Standards and Testing Agency under the Key Stage 1 and Key Stage 2 assessment and reporting arrangements (ARA). This is a statutory requirement and sharing is done under legal obligation and public task lawful bases.
For general enquiries about the assessment and reporting arrangements, contact the national curriculum assessments helpline on 0300 303 3013 or email assessments@education.gov.uk.
Youth *Support Services*
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.
This enables them to provide services as follows:

- youth support services
- careers advisers

The information shared is limited to the child's name, address and date of birth. However where a parent or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the child / pupil once they reach the age 16.
Data is securely transferred to the youth support service via, is stored and held for a set amount of time. Please see our website for more information Policies | The White House

15. Your Rights

How to Access Personal Information that We Hold About You

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that apply):

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

Your Other Rights Regarding Your Data

Under UK data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

16. Withdrawal of Consent and Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance. Alternatively, you can make a complaint to the Information Commissioner's Office:

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

Where we process your personal data based on your consent, you have the right to withdraw that consent at any time.

To request the withdrawal of your consent, please contact Lisa Dando, Assistant Headteacher at lisa@thewhitehouseschool.org. We will respond to your request promptly and ensure that your data is no longer processed on the basis of consent, unless another lawful basis applies.

Under Section 164A of the Data Protection Act 2018, you have a statutory right to complain if you believe your personal data has been handled inappropriately.

If you wish to raise a concern about how we process your personal data, please contact us directly at lisa@thewhitehouseschool.org. We will acknowledge your complaint within 30 days of receipt and take appropriate steps to investigate and respond without undue delay.

If you are not satisfied with our response, you may escalate your complaint to the Information Commission at: Information Commissioner's Office

17.How Government Uses Your Data

The pupil data that we lawfully share with the Department for Education (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 and school accountability and intervention (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 (DfE) (for example; via the school census) go to https://www.gov.uk/education/data-collection-and-censuses-for-schools

The National Pupil Database (NPD)

The NPD is owned and managed by the Department for Education (DfE) and contains information about pupils in schools in England. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

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 NPD, go to

https://www.gov.uk/government/publications/national-pupil-database-npd-privacy-notice/national-pupil-database-npd-privacy-notice

Sharing by the Department for Education (DfE)

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 the Department for Education (DfE) Hold About You

Under the terms of UK GDPR, you're entitled to ask the Department for Education (DfE):

- 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 for Education (DfE), you should make a 'subject access request'. See the guide for details: https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights

18.Contact Us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer Caroline Chadwick, HR Manager at HR@thewhitehouseschool.org

19.Monitoring Arrangements

This notice will be reviewed annually by an executive director and shared with the headteacher.

20.Links to Other Policies

This notice should be read in conjunction with:

- Privacy Notice for Staff
- Privacy Notice for Visitors
- Privacy Notice for School Board Member and Volunteers
- GDPR Policy

Approval & Policy Review

This Policy has been reviewed and approved by:

Policy Approver(s)	Elle Vinall - Headteacher
Storage Location	Online
Effective Date	September 2026
Next Review Date	July 2027

Version	Change	Author	Date of Change
1	Updated policy for new academic year	Elle Vinall	July 2025
2	Updated format to match Cavendish Policies.	Lisa Dando	September 2026