



Northstar  
Nurture School

## | Privacy Policy

This policy was reviewed on:

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Date: March 2026

By: Euan Macdonald

Policy will be reviewed on: March 2027

This policy was ratified/reviewed by Governors on:

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Date: March 2026

Frequency of review: Every 2 year(s)

## 1. Introduction and Scope

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Northstar Nurture School ('the school', 'we', 'us', 'our') is an independent special school in London providing education to pupils with Special Educational Needs and Disabilities (SEND). The school is committed to protecting the privacy and personal data of all individuals associated with it, including pupils, parents and carers, staff, governors, volunteers, and visitors.

This Privacy Policy explains how we collect, use, store, share, and protect personal data in compliance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018 (DPA 2018)
- SEND Code of Practice 2015
- Children and Families Act 2014
- Education (Independent School Standards) Regulations 2014
- Special Educational Needs and Disability Regulations 2014
- The Freedom of Information Act 2000
- Any other applicable UK legislation

This policy applies to all personal data processed by the school, regardless of the format in which it is held (electronic, paper, or other media) and covers all processing activities carried out by the school as a data controller.

## 2. Data Controller and Contact Details

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Northstar School is the Data Controller for all personal data processed in connection with its activities. The school is registered with the Information Commissioner's Office (ICO).

Data Controller Contact Information
School Name: Northstar Nurture School
Address: c/o James Cambell Primary, Langley Crescent, Dagenham RM9 6TD
Telephone: 020 3848 8806
Email: <a href="mailto:info@northstarnurture.school.org">info@northstarnurture.school.org</a>
ICO Registration Number: ZC084362
Data Protection Officer (DPO): Euan Macdonald
DPO Contact Email: <a href="mailto:EMacdonald@northstarnurture.school.org">EMacdonald@northstarnurture.school.org</a>
DPO Contact Telephone: 020 3848 8860

The school has appointed a Data Protection Officer (DPO) as required under UK GDPR. The DPO is responsible for overseeing data protection strategy and implementation and may be contacted directly with any data protection queries or concerns.

## 3. Personal Data We Process

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### 3.1 Pupil Data

Given the nature of our specialist SEND provision, we process a significant range of personal data about our pupils, including Special Category Data. This may include:

#### Personal and Family Information

- Full legal name, preferred name, date of birth, gender, and unique pupil number (UPN)
- Home address, emergency contact details, and next-of-kin information
- Nationality, country of birth, first language, and ethnicity
- Looked-after child (LAC) or previously looked-after child status
- Immigration and asylum seeker status (where relevant)

#### Special Category Data — Health and SEND

- Diagnosis(es) and medical conditions, including physical, mental health, neurological, and developmental conditions
- Education, Health and Care (EHC) Plans and all associated assessment reports
- Specialist reports from Educational Psychologists, Speech and Language Therapists, Occupational Therapists, CAMHS, and other professionals
- Medication requirements, healthcare plans, and first aid records
- Physical, sensory, or mobility needs, including equipment and accessibility requirements
- Safeguarding records and child protection information
- Attendance records and reasons for absence, including medical absences

#### Academic and Progress Data

- Assessment results, targets, progress reviews, and pupil passports
- Behavioural records, incident reports, and positive behaviour support (PBS) plans
- Annual review documentation and EHCP review outcomes
- Photographs and video used for educational assessments and progress monitoring

### 3.2 Parent and Carer Data

- Full name, relationship to pupil, home address, and contact details
- Financial information relating to school fees and funding arrangements
- Communication records and consent forms
- Legal documentation including residence orders, court orders, or parental responsibility records

### 3.3 Staff Data

- Personal details including name, address, National Insurance number, and bank details
- Employment history, qualifications, and professional registrations
- DBS (Disclosure and Barring Service) check results and safeguarding training records

- Performance management records, sickness absence, and occupational health information
- Trade union membership (where disclosed)

### 3.4 Other Individuals

- Visitors, contractors, and volunteers: name, contact details, and DBS information where required
- Governors: personal and professional information required for governance purposes

## 4. Lawful Basis for Processing

We process personal data only where we have a valid lawful basis under UK GDPR Article 6, and for Special Category Data, an additional condition under Article 9. Our primary lawful bases are as follows:

Lawful Basis	Application at Northstar School
Legal Obligation	Processing necessary to comply with education legislation, SEND statutory duties, safeguarding obligations, and Ofsted/ISI inspection requirements
Public Task / Legitimate Interests	Carrying out our educational and pastoral functions as a specialist SEND school, including EHC Plan implementation and provision of specialist therapies
Vital Interests	Processing necessary to protect the life or wellbeing of a pupil or other individual in an emergency
Contract	Processing necessary in relation to employment contracts, service contracts, and school fee agreements
Consent	Where none of the above apply, we seek explicit, freely given, informed, and withdrawable consent — particularly for non-essential photographs and marketing materials

For Special Category Data (health, SEN, ethnicity, etc.), we rely primarily on:

- Article 9(2)(b): Employment, social security and social protection obligations
- Article 9(2)(c): Protection of vital interests
- Article 9(2)(g): Reasons of substantial public interest (Schedule 1 DPA 2018)
- Article 9(2)(h): Health or social care purposes
- Explicit consent where required

## 5. Purposes of Processing

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We collect and use personal data for the following purposes:

### Education and SEND Provision

- Delivering and reviewing each pupil's individual education programme and EHC Plan
- Coordinating with local authorities regarding EHCP reviews, annual reviews, and tribunal proceedings
- Providing specialist therapies including Speech and Language Therapy, Occupational Therapy, and physiotherapy
- Monitoring progress, attendance, and wellbeing

### Safeguarding and Child Protection

- Fulfilling our statutory duty to safeguard and promote the welfare of children
- Sharing information with statutory agencies (police, children's social care) when required
- Maintaining the single central record (SCR) and safeguarding records

### School Administration and Management

- Managing admissions and maintaining the school roll
- Processing fees and managing financial transactions
- Communicating with parents, carers, and external professionals
- Managing staff employment, payroll, and HR matters

### Regulatory and Legal Compliance

- Reporting to the Department for Education (DfE), Ofsted/ISI, and local authorities
- Complying with statutory returns and census requirements
- Maintaining records required by law

## 6. Processing Special Category and Sensitive Data

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As a SEND school, the school processes substantial volumes of Special Category Data, particularly relating to pupils' health, disabilities, and neurodivergent profiles. We treat this data with the highest level of care and apply the following safeguards:

- Access is strictly limited to staff with a legitimate professional need
- All staff who handle Special Category Data receive annual data protection training
- Physical records containing sensitive information are stored in locked cabinets
- Electronic records are stored on password-protected, encrypted systems with role-based access controls
- Pseudonymisation or anonymisation is used wherever possible for research or reporting purposes
- Data minimisation principles are applied so that only the minimum necessary data is collected and used

Where we process criminal conviction data (e.g., DBS check results for staff), we do so under Schedule 1 of the DPA 2018 and the relevant regulatory requirements for schools.

## 7. Sharing Personal Data

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### 7.1 Who We Share Data With

We may share personal data with third parties only where lawful to do so. Recipients may include:

Recipient	Purpose
Local Authorities	For EHC Plan coordination, funding, annual reviews, and statutory returns
Department for Education (DfE)	For statutory data returns, including the School Census
NHS and Health Professionals	For coordinating health input to EHC Plans and health care plans
Children's Social Care / Police	In response to safeguarding concerns or legal obligations
Ofsted / ISI	During inspections and for regulatory compliance
Exam Bodies	For external assessments and qualifications
IT Service Providers	For school management systems, email, and data storage (under data processing agreements)
Payroll and HR Providers	For staff payroll and HR administration
Insurers and Legal Advisors	Where required for legal proceedings or insurance claims
Specialist Therapists (external)	Where therapy is commissioned as part of an EHC Plan
Parents and Carers	Information about their own child(ren) as appropriate
Other Schools / Colleges	On transition, with appropriate consent or legal basis

### 7.2 Safeguards for Data Sharing

Before sharing personal data with third parties, we ensure:

- A valid lawful basis exists for the sharing
- Where sharing involves a data processor, a written Data Processing Agreement (DPA) is in place
- Only the minimum necessary data is shared
- Where feasible, data is shared securely (e.g., encrypted email, secure portal)
- A record of the sharing is maintained in our data sharing log

### 7.3 International Transfers

We do not routinely transfer personal data outside the United Kingdom. Where any transfer is necessary (e.g., use of cloud services hosted overseas), we ensure appropriate safeguards are in place, including Standard Contractual Clauses (SCCs) approved by the ICO, or reliance on an adequacy decision.

## 8. Data Retention

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We retain personal data only for as long as necessary for the purpose for which it was collected, or as required by law. Our retention schedule is based on guidance from the Information Records Management Society (IRMS) for schools and the DfE. Key retention periods include:

Category of Data	Retention Period
EHC Plans and annual review documents	Retained until the pupil is 35 years old (25 years after leaving school at age 10)
Pupil academic records and progress data	Retained for 25 years after the pupil leaves the school
Child protection and safeguarding records	Retained until the pupil is 25 (or longer if specified by local authority)
Medical records and healthcare plans	Retained for a minimum of 8 years after last treatment; longer for children
Admissions records (unsuccessful applicants)	Retained for 1 year after the decision
Staff employment records	Retained for 6 years after employment ends
DBS check results (staff)	Retained for up to 6 months, then securely destroyed
Financial records (fees, payroll)	Retained for 6 years in accordance with HMRC requirements
CCTV footage	Retained for a maximum of 31 days unless required for investigation

Upon expiry of the relevant retention period, data is securely destroyed or anonymised. Destruction is documented and recorded.

## 9. Data Security

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The school implements appropriate technical and organisational measures to protect personal data against unauthorised access, accidental loss, destruction, or disclosure. Measures include:

### Technical Measures

- Password-protected systems with multi-factor authentication (MFA) where available
- Encrypted storage of electronic records and encrypted email for sharing sensitive data
- Firewalls, antivirus software, and regular security patching
- Role-based access controls ensuring staff can only access data relevant to their role
- Regular back-ups with tested recovery procedures
- CCTV systems with restricted access to footage

### Organisational Measures

- Annual data protection training mandatory for all staff
- A clear desk and clear screen policy
- Secure disposal of paper records containing personal data (cross-cut shredding)
- Visitor sign-in procedures and escorted access to secure areas

- Incident response and breach notification procedures
- Regular Data Protection Impact Assessments (DPIAs) for high-risk processing activities

## 10. Data Breaches

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In the event of a personal data breach, the school will:

- Contain the breach as quickly as possible
- Assess the likely risk and harm to affected individuals
- Report the breach to the ICO within 72 hours if it is likely to result in a risk to individuals' rights and freedoms
- Notify affected individuals without undue delay if the breach is likely to result in a high risk to their rights and freedoms
- Document all breaches (whether reported or not) in the school's breach log

All staff are required to report any actual or suspected data breaches immediately to the DPO or the Headteacher.

## 11. Your Data Protection Rights

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Under UK GDPR, individuals have the following rights in relation to their personal data. Please note that some rights are qualified and may be limited in certain circumstances, particularly where processing is necessary for a legal obligation or to protect vital interests.

Right	Details
Right of Access (Subject Access Request / SAR)	You have the right to request a copy of the personal data we hold about you. We will respond within one calendar month. This is free of charge unless the request is manifestly unfounded or excessive.
Right to Rectification	You have the right to request correction of inaccurate or incomplete personal data we hold about you.
Right to Erasure ('Right to be Forgotten')	You may request deletion of your personal data in certain circumstances, e.g., where it is no longer necessary for the purpose it was collected. This right does not apply where we are required to retain data by law.
Right to Restrict Processing	You may request that we limit how we use your data while a complaint or query is being resolved.
Right to Data Portability	Where processing is based on consent or contract and carried out by automated means, you may request your data in a machine-readable format.
Right to Object	You have the right to object to processing based on legitimate interests or carried out for direct marketing purposes.
Rights in Relation to Automated Decision-Making	You have the right not to be subject to decisions made solely by automated means that produce significant effects. The School does not use solely automated decision-making.

Right	Details
Right to Withdraw Consent	Where processing is based on consent, you may withdraw it at any time. Withdrawal does not affect the lawfulness of processing prior to withdrawal.

To exercise any of these rights, please submit a written request to the DPO at [dpo@northstarschool.co.uk](mailto:dpo@northstarschool.co.uk). We may need to verify your identity before processing the request.

## 12. Rights of Parents, Carers, and Pupils

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The school recognises that parents and carers have a legitimate interest in information about their child's education and wellbeing. However, sharing information is subject to the following considerations:

- The rights of parents are generally exercised on behalf of the child. As pupils mature and acquire Gillick competence, they may exercise rights independently.
- Where a child has an EHC Plan, the Local Authority may also have rights and obligations regarding information sharing.
- We will respect any court orders restricting parental access to information, including non-molestation orders or prohibited steps orders.
- Where parents or carers are separated, we will generally provide equal access to information to all those with parental responsibility unless a court order prevents this.

Pupils who are 13 years or older and who have sufficient understanding may exercise data subject rights directly.

## 13. Website and Cookies

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The Northstar School website may use cookies and similar tracking technologies to improve user experience and analyse website traffic. Our website privacy notice, available on our website, provides full details of the cookies used, their purposes, and how to manage your cookie preferences.

We do not use the school website to collect personal data from children or to serve targeted advertising.

## 14. Photography, Video, and Media

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Given the vulnerability of our pupil cohort, the school takes a particularly cautious approach to the use of photographs and video. Specifically:

- We will seek explicit written consent from parents and carers before taking or using photographs or video of pupils for any purpose other than direct educational assessment
- Consent is specific (i.e., we will specify the intended use) and can be withdrawn at any time
- Images are stored securely and not shared on public-facing platforms without separate, informed consent
- Staff are prohibited from taking photographs of pupils on personal devices
- Press or media requests involving pupils will only be facilitated with explicit, prior parental consent

Any consent given does not constitute a waiver of data protection rights.

## 15. Third-Party Data Processors

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The school uses a number of external service providers who process personal data on our behalf ('data processors'). We ensure that all processors are bound by written Data Processing Agreements (DPAs) that meet the requirements of UK GDPR Article 28. Processors are permitted to process personal data only on the school's documented instructions.

Categories of processors used by the school may include:

- School Management Information System (MIS) provider
- Cloud storage and email service provider
- Payroll and HR software provider
- Communication platforms (e.g., school-to-parent messaging apps)
- Educational platforms and online learning tools
- CCTV system provider

A current list of approved processors is maintained by the DPO and is available on request.

## 16. Data Protection Impact Assessments (DPIAs)

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The school carries out Data Protection Impact Assessments (DPIAs) prior to commencing any new processing activity that is likely to result in a high risk to individuals' rights and freedoms. DPIAs are particularly required when:

- Introducing new technology that involves the processing of Special Category Data
- Undertaking systematic monitoring of pupils (e.g., new CCTV systems or electronic monitoring tools)
- Processing data involving vulnerable individuals, including children with SEND, on a large scale
- Sharing data with new third parties or transferring data internationally

All DPIAs are reviewed by the DPO before processing commences.

## 17. Complaints and Concerns

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If you have a concern about how Northstar School handles your personal data, we encourage you to contact us in the first instance so we can attempt to resolve the matter.

### How to Raise a Data Protection Concern

Step 1: Contact the DPO at [EMacdonald@northstarnurtureschool.org](mailto:EMacdonald@northstarnurtureschool.org) or in writing to the school address

Step 2: We will acknowledge your concern within 5 working days and aim to resolve it within 30 calendar days

Step 3: If you remain dissatisfied, you have the right to complain to the ICO

## Information Commissioner's Office (ICO) Contact Details

Website: [www.ico.org.uk](http://www.ico.org.uk)

Helpline: 0303 123 1113

Address: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## 18. Changes to This Privacy Policy

This Privacy Policy is reviewed annually, or sooner if there are significant changes to law, guidance, or School practice. The date of the most recent review is shown on the front page. The current version of this policy is published on the school website and is available from the school office on request.

Where changes are material and affect how we use personal data about pupils and their families, we will notify parents and carers directly.

## 19. Glossary of Key Terms

Term	Definition
Data Controller	An organisation that determines the purposes and means of processing personal data. Northstar School is the Data Controller.
Data Processor	An organisation that processes personal data on behalf of a data controller.
Data Subject	The individual whose personal data is being processed (e.g., a pupil, parent, or staff member).
DPA 2018	Data Protection Act 2018 — the UK statute that supplements UK GDPR.
DPO	Data Protection Officer — a legally required role with responsibility for data protection compliance.
EHC Plan	Education, Health and Care Plan — a statutory document setting out the needs of a child with SEND and the provision to be made.
ICO	Information Commissioner's Office — the UK's independent data protection regulator.
Personal Data	Any information relating to an identified or identifiable natural person.
SEND	Special Educational Needs and Disabilities.
Special Category Data	Data revealing racial or ethnic origin, political opinions, religious beliefs, trade union membership, health, sex life, sexual orientation, genetic data, or biometric data.
UK GDPR	UK General Data Protection Regulation — the primary data protection law in the UK following Brexit.

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## Policy Approval and Sign-off

Policy approved by Governors:	NR
Date of Approval:	17.3.2026
Headteacher Signature:	EM
DPO Signature:	EM
Next Review Date:	March 2027