

Document control

Field	Content
Document title	Privacy Notice: How we use pupil information
Approved by	Caroline Bennett, Chief Executive and Data Protection Lead
Reviewed by	Caroline Bennett, Chief Executive and Data Protection Lead and Kurt Austin-Archer, Director of Clinical Services
Supersedes	Pupil Privacy Notice 2025 to 2026, approved 21 November 2025
Last updated	August 2026
Next review	September 2027
Owner	Chief Executive

Related Pace policies

This notice should be read alongside:

- Data Protection Policy
- Data Retention Policy
- Supporting Pupils with Medical Conditions Policy

Legal and regulatory framework

This notice is written in line with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018, including Schedule 1
- Children and Families Act 2014, Section 100

For Parents and Pupils of Pace School

The purpose of this document is to provide information to pupils and parents about how data and information about children is used at Pace. This document applies to pupils aged 3–16 who attend Pace school for their education.

Who are we?

The Pace Centre Limited is a registered charity (charity number 1011133) and our registered address is The Pace Centre, Bradbury Campus, 156 Wendover Road, Stoke Mandeville, Aylesbury, HP22 5TE. Our company number is (02707807).

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

- Personal information (such as name, unique pupil number and address, name and contact details of parents/guardians/carers)
- Characteristics (such as ethnicity, language, nationality, country of birth)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Local Authority details
- Education and Health Care Plan
- Clinical data and therapy notes and reports, including photographic and video records
- Therapy assessment, including photographic and video records
- Relevant medical information including any conditions or allergies a pupil may have, the need for epi-pens/medication, emergency contacts and doctor's details
- Meeting notes
- Historic school reports, individual learning plans and academic data
- Examples of schoolwork and photographic and video records
- Safeguarding information
- Dietary information
- Medical information, including medication
- CCTV and photographs
- Biometric voice recordings

Why we collect and use this information

We use the pupil data:

- To maintain up to date contact information of parents /guardians and in the case of emergency
- To support pupil learning
- To monitor and report on pupil progress
- To record and report on clinical interventions
- To record and report on clinical progress, regression or change
- To provide appropriate health care and pastoral care
- To assess the quality of our services
- To comply with the law regarding data sharing
- To comply with the law regarding clinical and educational record keeping

The lawful basis on which we use this information

The lawful basis under which we collect, store and use data is defined in [Article 6 of the UK General Data Protection Regulation \(UK GDPR\) – Lawfulness of Processing](#). We have set out below a description of all the ways in which we use pupil and parent/guardian/carer information and the lawful basis we rely on to do so. We may process pupil and parent/guardian/carer information for more than one lawful ground depending on the specific purpose for which we are using your information.

Purpose /Activity	Type of Information	Lawful Basis for Processing Information
1.1. To support pupil learning	Contact details and characteristics	Necessary to comply with our legal obligations
	Attendance information	Necessary for the performance of a task carried out in the public interest
	Assessment information	
	Special educational needs information	
	Behavioural information	

	Pastoral and safeguarding information	
1.2. To monitor and report on pupil progress, enabling suitable interventions to be put in place where required	Contact details and characteristics Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information	Necessary to comply with our legal obligations Necessary for the performance of a task carried out in the public interest
1.3. To manage our admissions and waitlists	Contact details and characteristics Special educational needs information Behavioural information	Necessary for the performance of a task carried out in the public interest Necessary for our legitimate interests to manage our waitlist/potential students with regard to class sizes, peer groups and income projections
1.4. To provide appropriate pastoral care and ensure pupils have access to appropriate support	Contact details and characteristics Attendance information Assessment information Special educational needs information	Necessary to comply with our legal obligations Necessary for the performance of a task carried out in the public interest

	Behavioural information Pastoral and safeguarding information	
1.5. To assess the quality of our services	Contact details and characteristics Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information	Necessary to comply with our legal obligations Necessary for our legitimate interests to improve our performance
1.6. To keep pupils and staff safe	Contact details and characteristics Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information Photographs CCTV	Necessary to comply with our legal obligations Necessary for the performance of a task carried out in the public interest
1.7. To comply with statutory duties placed upon us	Contact details and characteristics	Necessary to comply with our legal obligations

for Department for Education data collections	Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information	Necessary for the performance of a task carried out in the public interest
1.8. To keep parents/guardians/carers informed about pupil learning, progress and wellbeing	Contact details and characteristics Attendance information Assessment information Special educational needs information Behavioural information Pastoral and safeguarding information	Necessary for our legitimate interests to keep parents/guardians/carers informed about their child's education and wellbeing
1.9. To share photographs of your child with you as part of routine communication	Contact details Photographs	Consent
1.10. To market our services and the work we are doing	Contact details Photographs/videos	Explicit Consent

The lawful basis on which we use 'special category data'

We have set out below a description of all the ways we plan to use more sensitive "special category data" of pupils and parents/guardian/carers, and which of the legal bases we rely on to do so. We may process pupil and parent/guardian/carer information for more than one lawful ground depending on the specific purpose for which we are using your information.

Purpose /Activity	Type of Information	Lawful Basis for Processing Information
2.1. To provide our therapy services	Medical information Clinical records (including photograph and video records)	Necessary to comply with our legal obligations Schedule 1, Part 1, (2) Data Protection Act 2018 – Provision of Health Care
2.2. To maintain clinical records relating to the provision of our services	Medical information Clinical records (including photograph and video records)	Necessary to comply with our legal obligations Schedule 1, Part 1, (2) Data Protection Act 2018 – Provision of Health Care
2.3. To communicate with other health professional involved in pupil care	Contact details and characteristics Medical information Clinical records (including photograph and video records)	Necessary for the performance of a task carried out in the public interest Schedule 1, Part 1, (2) Data Protection Act 2018 – Provision of Health Care
2.4. To ensure your dietary needs are catered for	Dietary requirements and medical information	Vital interests Necessary to comply with our legal obligations Schedule 1, Part 2, (6) Data Protection Act 2018 – Statutory Purposes

2.5. To make reasonable adjustments for the provision of learning	Medical information	Necessary to comply with our legal obligations Schedule 1, Part 2, (6) Data Protection Act 2018 – Statutory Purposes
2.6. For statistical analysis of our pupils	Race, nationality and ethnicity information	Necessary to comply with our legal obligations Schedule 1, Part 2, (6) Data Protection Act 2018 – Statutory Purposes
2.7. To keep pupils and staff safe	Medical information Behavioural information Pastoral and safeguarding information	Necessary to comply with our legal obligations Necessary for reasons of substantial public interest Schedule 1, Part 2, (18) Data Protection Act 2018 – Safeguarding children and adults at risk Schedule 1, Part 1, (3) Data Protection Act 2018 – Public Health
2.8. To support pupil learning	Special educational needs information Medical information	Necessary to comply with our legal obligations Necessary for reasons of substantial public interest Schedule 1, Part 2, (6) Data Protection Act 2018 – Statutory Purposes
2.9. To facilitate access to environmental controls within the school premises for pupils and to improve pupil	Voice recordings	Explicit consent

interactions with SMART Devices, ensuring a more inclusive and accessible educational environment		
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Collecting pupil information

Whilst the majority of pupil information you provide to us is mandatory because it is required for regulatory purposes, some of it is provided to us voluntarily. To comply with the UK GDPR, we will inform you what data is not mandatory.

Storing pupil data

We hold pupil data for 25 years from the date of birth of the pupil. Any information held by us which does not form part of the pupil file or clinical records will be kept for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. See our Data Retention Policy.

Collecting information on enquiry for school placement

When an admission enquiry is received by Pace, an assessment of the child is carried out. For assessment purposes, information including categories from paragraph 2 may be obtained. After the assessment, a report is completed for the parents and Local Authority and a copy retained securely by Pace.

If the child is placed with Pace school, this data is held as part of the pupil information.

If the child is not placed with Pace school this data is deleted after 24 months from the last contact.

Collecting clinical data

We collect and store clinical data in line with our Legal Obligations and Professional Standards set by the [The Health and Care Professions Council](#), [Royal College of Occupational Therapist](#), The [Chartered Society of Physiotherapists](#) and the [Royal College of Speech and Language Therapists](#).

Clinical data, known as Clinical Notes, Clinical Record Keeping, Treatment Notes or Clinical Assessments, which include photography and video, is collected during:

- Adhoc interaction with children where the interaction involved decision making, intervention or impacts on the attainment of a child's goal
- Plan interactions with children where intervention, programmes or assessments** are carried out
- Parental communications where a parent informs us or is informed of any clinical interaction, decision, or actions that need or have been taken

**Assessment data is obtained in line with nationally recognised assessment criteria and in accordance with Standard Operating Procedures **

Storing clinical data

Clinical data will be stored in accordance with our clinical record policy and processes. We hold clinical data for 25 years from the date of birth of the pupil. See our Data Retention Policy.

Who we share pupil information with

We routinely share pupil and parent/guardian/carer information with:

- Schools or settings that pupils attend after leaving Pace
- The pupil's Local Authority and/or Buckinghamshire Local Authority
- Ofsted
- The Department for Education (DfE)
- School nurse service: Buckinghamshire Health Trust
- Other professionals associated with the pupils, for example, teachers, doctors, therapists, caseworker, SEN manager, social workers
- Law enforcement agencies
- Courts and tribunals
- Our auditors, insurers and professional advisers
- Other third parties we may engage the services of for the purposes of running Pace and delivering our services

We share pupil and parent information where the law allows or requires it. Where sharing is necessary for safe education, therapy, health care or safeguarding, we rely on the lawful bases set out above rather than consent. We ask for consent

only where sharing is genuinely optional, for example photography, marketing and voice recordings.

Why we share pupil information

Educational Data

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 the DfE: <https://www.gov.uk/contact-dfe>

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

Youth support services

Pupils aged 13+

Once our pupils reach the age of 13, we also pass pupil information to the appropriate 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:

- Transition to other settings
- Youth support services
- Careers advice if appropriate

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.

For more information about services for young people, please visit the Local Authority website appropriate to the pupil.

Clinical data sharing

We share clinical data where our legal obligations require us to, as part of routine liaison with the healthcare professionals involved in a child's care, or where requested by a parent or guardian. This routine liaison is carried out under our duty of care, in line with the standards set out in Section 100 of the Children and Families Act 2014, and under the lawful bases set out above, and does not require parental consent. The reasons for sharing clinical data are:

- **Legal and Ethical Obligations:** We are required to share relevant clinical information with the healthcare professionals involved in a pupil's care, to ensure they receive safe and effective treatment
- **Comprehensive Care:** Ensuring that all healthcare professionals or allied health professionals (AHPs) involved in our pupil's care have a complete understanding of their medical history, current condition, and treatment plan
- **Safety:** Sharing data helps identify potential risks and prevent medical errors, manual handling and pupil care and interactions
- **Improved Outcomes:** We collaborate and share information, improving treatment outcomes. For example, a physiotherapist might need to know about a patient's medication from their doctor to avoid any contraindications during physical therapy

Storing Pupil Information

Information about our pupils and parents/guardians/carers is stored securely within our systems and held within the UK. However, it may be necessary in certain circumstances to transfer this information to a location outside the UK. If we are required to transfer any information outside the UK, we shall do so in accordance with UK data protection law.

Requesting access to your personal data

Under data protection legislation, parents/guardians and pupils have the right to request access to information about them that we hold. To make a Subject

Access Request (SAR) or be given access to your child's educational record, contact our Data Protection Lead.

You also have the right to:

- Object to the processing of personal data that is likely to cause, or is causing, damage or distress*
- Prevent processing for the purpose of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed
- Claim compensation for damages caused by a breach of the Data Protection regulations

For more detail on these rights, see our Data Protection Policy.

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

**The right to object only applies in certain circumstances. Whether it applies depends on the purposes for processing and lawful basis for processing.*

Withdrawal of Consent

Where the processing of data is based on your consent, you have the right to withdraw that consent at any time. This applies to box 1.9 (sharing photographs of your child as part of routine communication), box 1.10 (marketing our services, including photographs and videos), and box 2.9 (voice recordings used for environmental controls and SMART Devices). If you would like to change your consent setting, don't hesitate to get in touch with Info@thepacecentre.org. Please refer to the Child Photography Code for full details on box 1.10.

Contact

If you would like to discuss anything in this privacy notice, please contact our Data Protection Lead: Caroline Bennett at info@thepacecentre.org.