



PRIVACY NOTICE FOR PARENTS

School	Polam School & Nursery
Effective date	3 rd September 2026
Last reviewed	September 2025
Next review	September 2027, or earlier if our processing or the law materially changes
Document owner	Data Protection Officer
Version	2.0

1. About this notice

We take the privacy of pupils, prospective pupils and their families seriously. This notice explains what personal information we collect about you and your child, why we use it, who we may share it with, how long we keep it and the rights available to you and your child.

This notice applies when your child is applying to, attends, or has attended Polam School & Nursery. It also applies when you make an enquiry, attend an open day or otherwise communicate with us about admissions or school services. We publish a separate, age-appropriate privacy notice for pupils on the school website.

This notice does not form part of the parent contract. We may update it from time to time and will draw material changes to your attention where appropriate.

2. Who is responsible for your information

Redshift Education Ltd, operating through Polam School & Nursery, is the data controller responsible for the personal information described in this notice. In this notice, “we”, “us” and “our” mean the relevant controller and the school.

Redshift Education Ltd's registered office is 71-75 Shelton Street, Covent Garden, London, WC2H 9JQ. Its ICO registration number is ZB944980.

Our Data Protection Officer oversees compliance across Redshift Education and can be contacted at DPO@redshiftdeducation.co.uk or at the address above.

We process personal information in accordance with the UK General Data Protection Regulation, the Data Protection Act 2018 as amended by the Data (Use and Access) Act 2025, the Privacy and Electronic Communications Regulations where applicable, and other relevant law.

3. Personal information we collect

The information we collect depends on your relationship with the school and the services involved. It may include:

- identity and contact information, including names, addresses, telephone numbers, email addresses, dates of birth, photographs and parent or guardian relationships;
- admissions information, including proposed entry date and year group, current and previous schools, education history, assessments, references, interests, family connections, other schools applied to (if provided), nationality and immigration or visa-sponsorship information where relevant;
- information about parents and guardians, including contact preferences, occupation and employer details where provided, parental responsibility, court orders and relevant family circumstances;
- education information, including attendance, attainment, progress, reports, behaviour, disciplinary matters, special educational needs and disabilities, learning support and examination information;
- pastoral, welfare and safeguarding information, including concerns, referrals and child-protection records;
- health and medical information, including conditions, allergies, medication, accidents, injuries and dietary or access requirements;
- financial and contractual information, including fees, invoices, payment records, bank or card-related information, bursary or scholarship information and debt-recovery records;
- communications with you and your child, including emails, letters, calls, meeting notes, complaints, requests and survey responses;
- images, audio or video recordings, including school photographs, recordings of online meetings or events where applicable, and CCTV footage;
- transport, trip, co-curricular and activity information, including location information where used for school transport or safeguarding;
- information about use of school IT, communications and online services, including login details, device and network activity and monitoring records; and

- technical information collected when you use our websites or online forms, such as IP address, browser and device information, pages visited, form interactions and cookie or analytics data, as described further in our Cookie Notice.

4. Special-category and criminal-offence information

Some information receives additional legal protection. Special-category information we may process includes information revealing racial or ethnic origin, religious or philosophical beliefs, health information, certain special educational needs or disability information, and biometric information if it is ever used to identify a person.

Nationality, passport details, immigration status, occupation and family circumstances are personal information, but they are not automatically special-category information. We nevertheless protect them according to their sensitivity and the risks involved.

We may receive limited criminal-offence information where this is necessary for safeguarding, risk management or compliance with law. We only process it where we have a lawful basis and an additional condition permitted by data protection law.

5. How we obtain information

We collect information directly from you or your child, including through enquiry and registration forms, visits, assessments, the parent contract, payment processes and day-to-day communications.

We may also obtain information from other sources where relevant, including:

- previous or future schools and nurseries;
- referees, education professionals, examination bodies and learning-support professionals;
- health professionals, local authorities, social services, the police, courts and safeguarding agencies;
- the Department for Education, Ofsted, UK Visas and Immigration and other public or regulatory bodies;
- parents, guardians, relatives and other people authorised to communicate with us;
- payment providers, credit-reference or fraud-prevention services where appropriate; and
- our websites, IT systems, CCTV, access-control systems and service providers.

Where information is required by law, necessary for admission or necessary to provide education or safeguard a child, we will explain this where it may not be obvious. If required information is not provided, we may be unable to consider an application, enter into or perform the parent contract, provide particular support or comply with our legal duties. Other information is voluntary, and forms should identify this where appropriate.

6. Why we use personal information and our lawful bases

We use personal information only where the law permits us to do so. Depending on the purpose and the person concerned, we may rely on one or more of the following bases: taking steps at your request before entering into a contract; performing the parent contract; complying with a legal obligation; protecting someone's vital interests; pursuing our legitimate interests or those of another person where these are not overridden by individual rights; carrying out a specific task in the public interest where that task has a basis in law; and consent where consent is appropriate.

Our main purposes are set out below.

Admissions and enquiries

- responding to enquiries, providing information, arranging visits and open days, and recording communication preferences;
- administering registrations and applications, arranging assessments, obtaining references, making and communicating admissions decisions, managing waiting lists and preparing for entry;
- identifying appropriate support, access arrangements and reasonable adjustments; and
- checking identity, parental responsibility, eligibility, immigration status or visa-sponsorship requirements where relevant.

We generally rely on steps taken at your request before entering into a contract, performance of a contract where one exists, legal obligations and our legitimate interests in operating a fair, safe and effective admissions process. We do not rely on a compulsory consent to administer an application.

Education, pastoral care and school administration

- providing education, learning support, pastoral care, co-curricular activities, transport, trips, catering and other school services;
- monitoring attendance, progress, attainment, behaviour and wellbeing;
- managing examinations, reports, references, awards and pupil records;
- communicating with families and managing the parent relationship; and
- planning resources, improving school services and carrying out appropriately safeguarded analysis and surveys.

We generally rely on the parent contract, legal obligations and our legitimate interests in providing education, supporting pupils and operating the school effectively.

Safeguarding, health, SEND and equality

- safeguarding pupils and others, responding to concerns and sharing information with appropriate agencies;
- providing medical or pastoral support and responding to emergencies;
- identifying and meeting special educational needs, disabilities and reasonable adjustments; and
- monitoring equality of opportunity and preventing unlawful discrimination.

For ordinary personal information we may rely on legal obligations, vital interests and legitimate interests. For special-category information we also rely, as appropriate, on conditions relating to substantial public interest (including safeguarding children and equality of opportunity), health or social care, vital interests, legal claims, or explicit consent where the use is genuinely optional. We maintain an appropriate policy document where the law requires one.

Fees, finance and contracts

- administering fees, deposits, invoices, payments, refunds, bursaries and scholarships;
- credit control, debt recovery, fraud prevention, audit and financial reporting; and
- managing contracts, complaints, disputes, insurance and legal claims.

We rely mainly on contract, legal obligation and legitimate interests.

Safety, security and IT

- maintaining site security, access control and CCTV;
- protecting our networks, devices, accounts and information;
- monitoring use of school IT and communications in accordance with our policies; and
- preventing and investigating misuse, security incidents and unlawful activity.

We rely mainly on legal obligations and our legitimate interests in keeping the school community, premises and systems safe and secure.

Communications, community engagement and marketing

- sending service messages about an enquiry, application, your child's education, school operations, safety or contractual matters;
- keeping appropriate contact with former pupils and families and supporting the school community; and
- sending optional information about open days, events and future admissions opportunities.

Operational messages are not marketing and are generally sent under contract, legal obligation or legitimate interests. For direct electronic marketing, we rely on consent where required, or on another basis permitted by data protection and electronic-marketing law. You can opt out of marketing at any time without affecting operational communications.

7. Our systems and HubSpot admissions platform

To support the purposes described in this notice, we use a range of software systems and technology to process personal information about pupils and their families. These include school management information systems, learning platforms, parent communication tools, finance and billing systems, safeguarding and medical-record systems, assessment and examination platforms, trip-management software, internet-safety tools and cloud services.

Depending on the school and service involved, these may include iSAMS, Evolve, Seesaw, Tapestry, Google Workspace, Microsoft 365, Lightspeed, Securely, Smartlog and HubSpot. The systems used may vary between schools and change over time. Our providers are required to protect personal information and comply with appropriate confidentiality, security and data-protection obligations.

We use HubSpot as a customer relationship management and admissions platform. Information submitted through an online enquiry or registration form may be entered into HubSpot so that the relevant school admissions team can respond, administer the application, record communications and the stage of the admissions process, arrange visits or events and, where you have chosen to receive it, send admissions marketing.

Access is role-based. Admissions staff should have access only to the records required for their school and role. A limited number of authorised Redshift central administrators may access records across schools for system administration, oversight, reporting, data quality, safeguarding, legal or compliance purposes. Separate applications for siblings are maintained as separate application records even where the same parent or guardian contact details are used.

HubSpot and authorised implementation, hosting and support providers process information on our instructions under contractual confidentiality, security and data-protection obligations. HubSpot workflows may route enquiries, issue acknowledgements, create tasks and support reporting, but they are not used to make final admissions decisions without meaningful human involvement.

Information collected through the admissions process may include identity and contact details, the child's education and proposed entry details, parent or guardian information, application history, communications and, where relevant, medical, SEND, disability, religion, nationality or immigration information. Fields which are not necessary are optional, and optional marketing choices are kept separate from the application.

8. Who we share information with

We share personal information only where there is a lawful and proportionate reason. Depending on the circumstances, recipients may include:

- authorised staff at the relevant school and authorised members of Redshift's central services team;
- other Redshift group companies where they provide central services or where sharing is otherwise necessary and lawful;
- previous or future schools, nurseries, examination bodies, education providers and professional referees;
- the Department for Education, Ofsted, local authorities, UK Visas and Immigration and other regulators or public bodies;
- health professionals, social services, safeguarding partners, the police, courts and other authorities;
- professional advisers, auditors, insurers, banks, payment providers, debt-recovery providers and fraud-prevention services;
- providers of school management, admissions and CRM, learning, communication, finance, assessment, transport, trip, catering, photography, security, cloud-hosting and IT-support services; and
- another organisation in connection with a proposed or completed reorganisation, acquisition or transfer of a school or business, subject to appropriate safeguards.

Service providers may act only on our documented instructions unless the law requires them to act independently. We require appropriate confidentiality, security and data-protection commitments. We do not sell personal information.

We may also disclose information where required by law, to protect a person's vital interests, to safeguard a child, to prevent or detect crime, or to establish, exercise or defend legal claims.

9. International transfers

Some of our suppliers, including cloud, communications and admissions technology providers, may store or access personal information outside the United Kingdom. Where personal information is transferred to a country without UK adequacy regulations, we use an approved transfer mechanism, such as the UK International Data Transfer Agreement or UK Addendum to the EU Standard Contractual Clauses, together with additional contractual, organisational or technical safeguards where required.

You may contact the Data Protection Officer for further information about the safeguards relevant to a particular transfer.

10. How long we keep information

We keep personal information only for as long as reasonably necessary for the purpose for which it was collected, including to meet legal, regulatory, safeguarding, accounting, insurance and dispute-resolution requirements. Our Group Data Retention and Disposal Policy sets out the standard retention periods that apply.

For admissions information, our usual approach is:

- enquiries that do not progress, and incomplete, withdrawn or unsuccessful applications: 24 months from the last meaningful activity or decision;
- accepted pupils: information needed for enrolment becomes part of the pupil record, while unnecessary application material is not retained separately;
- financial and transaction records: normally six years from the end of the financial or tax year to which they relate; and
- marketing information: kept while the relationship or relevant preference continues. Inactive contacts are reviewed after 24 months. If you opt out, we may retain the minimum information necessary to ensure that we continue to respect your choice.

Core pupil records are generally retained until the pupil's 25th birthday, unless the record is transferred to another school and we have no continuing reason to keep it. Different periods apply to certain records, including safeguarding, staff allegations, attendance, health and safety, complaints, insurance and legal records.

We may retain particular information for longer where it is relevant to a safeguarding matter, complaint, legal claim, insurance matter, investigation, regulatory inquiry or other legal obligation.

At the end of the applicable retention period, information will be securely deleted, destroyed, transferred or irreversibly anonymised, unless there is a lawful reason to retain it.

This now reflects the policy without unnecessarily reproducing the whole retention table.

11. Security

We use appropriate technical and organisational measures designed to protect personal information against accidental or unlawful loss, alteration, disclosure, access or destruction. These measures include access controls, role-based permissions, staff training, supplier due diligence, contractual controls, incident-management procedures and appropriate technical safeguards.

Access is limited to people who need the information for their role. Staff, contractors and service providers are subject to confidentiality obligations and are expected to follow our data-protection and information-security requirements.

12. Automated decision-making

We do not currently make admissions or other decisions about you or your child based solely on automated processing where the decision produces legal or similarly significant effects. Technology may assist with administration, routing, reminders, analysis or identifying matters for staff review, but a person remains meaningfully involved in significant decisions.

If this changes, we will provide the information required by law, explain the safeguards in place and tell affected individuals about applicable rights, including the ability to obtain human intervention, express their views and challenge the decision.

13. Your and your child's rights

Depending on the circumstances, you and your child may have rights to:

- receive clear information about how personal information is used;
- request access to personal information;
- ask us to correct inaccurate or incomplete information;
- ask us to erase information where there is no lawful reason to continue using it;
- ask us to restrict how information is used in certain circumstances;
- object to processing based on legitimate interests or public task, and object at any time to direct marketing;
- receive certain information in a structured, commonly used and machine-readable format and ask for it to be transferred where the right to data portability applies;
- withdraw consent at any time where we rely on consent, without affecting processing already carried out; and
- rights relating to significant decisions based solely on automated processing, where applicable.

These rights are not absolute and exemptions may apply. We may need information to confirm identity and authority before responding. A parent may usually exercise rights on behalf of a younger child, but a child who is sufficiently mature to understand their rights may exercise them personally. We consider the child's best interests, competence and confidentiality when dealing with requests.

You do not normally have to pay a fee. However, the law permits a reasonable fee or refusal in limited circumstances, including certain manifestly unfounded or excessive requests.

To exercise a right, contact DPO@redshiftdeducation.co.uk. You may use our request form if helpful, but you do not have to use a particular form for a valid request.

14. Questions and complaints

If you have a question or concern about how we use personal information, please contact the school in the first instance or contact our Data Protection Officer directly at DPO@redshiftdeducation.co.uk.

We will facilitate data-protection complaints, acknowledge receipt within 30 days and investigate and respond without undue delay. We may ask for information reasonably needed to clarify the complaint or confirm identity.

You also have the right to complain to the Information Commissioner's Office (ICO), the UK's data-protection regulator. You can find current contact details and complaint information at <https://ico.org.uk/make-a-complaint/>. We would welcome the opportunity to address your concern first, but you do not have to contact us before approaching the ICO.

15. Changes to this notice

We review this notice at least annually and whenever there is a material change to our processing, systems or legal obligations. The latest version will be published on the school website. We will use appropriate means to draw significant changes to the attention of affected families.