



BRIGHTFIELD
— A C A D E M Y —

Inclusion. Choice. Growth.



Privacy Policy & Privacy Notices



Our commitment to protecting personal information
and respecting the privacy of all individuals
connected with Brightfield Academy.



Inclusion.



Choice.



Growth.

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Privacy Policy & Notices

BRIGHTFIELD ACADEMY

Privacy Policy & Privacy Notices

Version: 1.1

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1. Purpose

Brightfield Academy is committed to protecting the privacy and personal information of everyone with whom we work. This document explains how we collect, use, store, share and protect personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other relevant legislation. This document combines Brightfield Academy's organisational Privacy Policy together with Privacy Notices for the different groups of people whose information we process. Our aim is to ensure that all personal information is handled lawfully, fairly, transparently and securely.

2. Scope

This policy applies to all personal information processed by Brightfield Academy, including information relating to:

- Learners
- Parents and carers
- Staff
- Directors
- Volunteers
- Contractors
- Job applicants
- Visitors
- Commissioners
- Referring schools
- Local Authorities
- Partner organisations

It applies to information held electronically, in paper records, photographs, CCTV recordings and any other format.

3. Our Commitment

Brightfield Academy recognises that trust is fundamental to effective education and safeguarding.

We are committed to:

- respecting every individual's privacy;
- processing personal information fairly and lawfully;
- collecting only the information we genuinely need;
- keeping information accurate and up to date;
- storing information securely;
- protecting information against loss, misuse and unauthorised access;
- sharing information only where appropriate and lawful;
- supporting individuals to exercise their information rights;
- maintaining a culture of confidentiality, accountability and transparency.

Safeguarding remains our highest priority. Where concerns exist that a child or vulnerable person may be at risk of harm, information may be shared without consent where permitted or required by law.

4. Data Protection Principles

Brightfield Academy processes personal information in accordance with the UK GDPR principles.

Personal information will be:

Lawful, Fair and Transparent

Individuals will understand why information is collected and how it will be used.

Collected for Specified Purposes

Information will only be collected for legitimate educational, safeguarding, employment or organisational purposes.

Adequate, Relevant and Limited

Only information necessary for those purposes will be collected.

Accurate

Reasonable steps will be taken to ensure information remains correct and current.

Stored Only as Long as Necessary

Information will be retained only for appropriate periods in accordance with legal requirements and recognised retention schedules.

Secure

Appropriate physical, technical and organisational safeguards will protect personal information.

Accountable

Brightfield Academy accepts responsibility for demonstrating compliance with UK data protection legislation.

5. Roles and Responsibilities

Directors

The Directors are responsible for ensuring that Brightfield Academy complies with data protection legislation and that suitable policies, procedures and monitoring arrangements are maintained.

Data Protection Lead

The appointed Data Protection Lead is responsible for:

- overseeing compliance;
- maintaining data protection policies;
- managing data breaches;
- coordinating Subject Access Requests;
- supporting staff training;
- advising on information governance.

Staff

All staff must:

- protect confidential information;
- follow this policy;
- report any suspected data breaches immediately;
- complete required training;
- maintain secure records;
- use information only for authorised purposes.

Volunteers and Contractors

Anyone working on behalf of Brightfield Academy must comply with this policy and maintain appropriate confidentiality at all times.

6. Lawful Bases for Processing Personal Information

Brightfield Academy processes personal information only where there is a lawful basis under Article 6 of the UK General Data Protection Regulation (UK GDPR), and where applicable, Article 9 for special category data.

Depending on the circumstances, we may rely upon one or more of the following lawful bases:

Legal Obligation

Where processing is necessary to comply with legal duties placed upon Brightfield Academy.

Examples include:

Safeguarding responsibilities

Health and safety requirements
Employment legislation
Keeping statutory educational records
Financial and taxation obligations

Public Task

Where processing is necessary for the performance of tasks carried out in the public interest or in the exercise of official authority.

Examples include:

Delivering educational provision
Monitoring learner progress
Supporting attendance
Working with Local Authorities and referring schools
Supporting statutory safeguarding processes

Contract

Where processing is necessary to fulfil a contract or agreement.

Examples include:

Employment contracts
Service agreements
Alternative Provision placement agreements
Commissioning arrangements

Legitimate Interests

Where processing is necessary for Brightfield Academy's legitimate organisational interests, provided these interests do not override an individual's rights and freedoms.

Examples include:

Maintaining secure IT systems
Improving services
Managing enquiries
Preventing fraud
Quality assurance and service evaluation

Consent

Where consent is relied upon, it will always be:

Freely given
Specific
Informed
Unambiguous
Capable of being withdrawn at any time

Examples may include:

Certain photographs or promotional materials
Marketing communications
Optional surveys
Some website cookies

Where consent is withdrawn, this will not affect any processing already carried out lawfully before withdrawal.

Special Category Information

Brightfield Academy occasionally processes information requiring additional legal protection, including information relating to:

Health

Disabilities and SEND

Ethnicity

Religious beliefs where relevant

Biometric information (if ever introduced)

Safeguarding records

This information is processed only where a lawful basis exists together with an additional condition under Article 9 of the UK GDPR, such as:

Safeguarding children and vulnerable individuals

Meeting employment obligations

Providing appropriate educational support

Protecting vital interests

Establishing or defending legal claims

Explicit consent, where appropriate

7. Information We Collect

The information collected by Brightfield Academy will vary depending upon the individual's relationship with the Academy.

Information may include:

Learner Information

Name and preferred name

Date of birth

Address

Parent or carer details

Emergency contacts

Attendance information

Educational records

EHCP information

SEND information

Behaviour records

Progress and assessment information

Medical information

Dietary requirements

Medication records

Accident and incident records

Safeguarding information

Photographs and video recordings (where appropriate)

Parent and Carer Information

Contact details

Relationship to learner

Emergency contact information

Correspondence

Financial information where required

Consents provided

Meeting notes

document

Staff Information

Recruitment documentation
Qualifications
References
DBS information
Identity verification
Employment history
Payroll information
Pension information
Performance management records
Training records
Occupational health information
Absence records
Emergency contact details

Volunteer Information

Contact details
DBS documentation
References
Training records
Emergency contacts

Visitor Information

Visitor signing-in records
CCTV images (where applicable)
Vehicle details where required
Purpose of visit

Website Users

Where individuals interact with the Brightfield Academy website, limited information may be collected, including:

IP address
Browser information
Website usage statistics
Contact form submissions
Cookies (where applicable)
Further information is provided within our Website Privacy Notice later in this

8. Sharing Personal Information

Brightfield Academy recognises that effective education, safeguarding and learner support often require appropriate information sharing.

Personal information will only be shared where:

- there is a lawful basis to do so;
- the individual has given consent (where consent is required);
- sharing is necessary to protect a child or vulnerable person;
- sharing is required by law.

We always aim to share the minimum amount of information necessary for the intended purpose.

Information may be shared with:

- Parents and carers
- Referring schools
- Local Authorities
- Social Care
- Health professionals
- Educational psychologists
- CAMHS and other specialist services
- Alternative Provision commissioners
- Examination and awarding organisations
- The Police where legally appropriate
- The Courts where legally required
- The Department for Education
- Ofsted
- The Information Commissioner's Office (ICO), where appropriate

Information will never be sold to third parties.

Where external organisations process information on behalf of Brightfield Academy, appropriate Data Processing Agreements will be in place where required.

9. Data Security

Brightfield Academy takes appropriate technical and organisational measures to safeguard personal information against accidental loss, unauthorised access, alteration or disclosure.

Security measures include:

- Password-protected systems
- Multi-factor authentication where available
- Secure cloud-based storage
- Restricted staff access based upon role
- Locked filing systems for paper records
- Encrypted devices where appropriate
- Secure disposal of confidential waste
- Routine software updates
- Anti-virus and cyber security protection
- Staff training in information security

Staff must immediately report any suspected loss, theft or unauthorised disclosure of personal information.

10. Data Retention

Brightfield Academy retains information only for as long as necessary to fulfil legal, safeguarding, educational and operational requirements.

Retention periods are determined using:

- Department for Education guidance
- Information and Records Management Society (IRMS) retention schedules
- Statutory safeguarding requirements
- Employment legislation
- Financial regulations

When information is no longer required, it will be securely destroyed using appropriate confidential disposal methods.

Electronic records will be securely deleted where possible.

11. Individual Rights

Under the UK GDPR, individuals have important rights regarding their personal information.

These include the right to:

Right to be Informed

To understand how and why personal information is processed.

Right of Access

To request a copy of personal information held by Brightfield Academy through a Subject Access Request.

Right to Rectification

To request correction of inaccurate or incomplete information.

Right to Erasure

To request deletion of personal information where appropriate and where no legal obligation requires its retention.

Right to Restrict Processing

To request that processing is temporarily limited in certain circumstances.

Right to Data Portability

Where applicable, to receive personal information in a commonly used electronic format.

Right to Object

To object to certain types of processing based upon legitimate interests or direct marketing.

Rights Relating to Automated Decision-Making

Brightfield Academy does not routinely make decisions based solely upon automated processing.

Some rights may be limited where safeguarding responsibilities or legal obligations apply.

12. Subject Access Requests

Individuals have the right to request copies of their personal information.

Requests should normally be made in writing to the Data Protection Lead.

Brightfield Academy may request proof of identity before releasing information.

Subject Access Requests will normally be responded to within one calendar month, although this may be extended where requests are particularly complex or numerous, in accordance with UK GDPR.

Information may be withheld where exemptions apply under the Data Protection Act 2018, including where disclosure could:

- prejudice safeguarding;
- identify another individual without consent;
- prejudice legal proceedings;
- breach statutory restrictions.

Where information cannot be provided, the reasons will be explained wherever legally possible.

13. Personal Data Breaches

A personal data breach is any security incident leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal information.

Examples include:

- Sending information to the wrong recipient
- Loss or theft of paperwork
- Lost laptops or mobile devices
- Unauthorised access to electronic systems
- Cyber attacks
- Confidential conversations overheard by unauthorised persons

All suspected breaches must be reported immediately to the Data Protection Lead.

The Data Protection Lead will:

- assess the nature of the breach;
- contain any immediate risks;
- investigate the circumstances;
- record the incident;
- determine whether notification to the Information Commissioner's Office (ICO) is required;
- notify affected individuals where legally necessary;
- identify actions to reduce the likelihood of recurrence.

Brightfield Academy is committed to learning from incidents and continually improving its information security arrangements.

14. Privacy Notices

The following Privacy Notices explain how Brightfield Academy collects, uses and protects personal information for different groups of people. They should be read alongside the preceding sections of this Privacy Policy.

Privacy Notice for Parents & Carers

Brightfield Academy understands the importance of protecting your family's personal information. We collect information to provide safe, effective educational provision and to meet our legal responsibilities.

What Information We Collect

We may collect:

- Your name and contact details
- Home address
- Telephone numbers
- Email addresses
- Emergency contact details
- Relationship to the learner
- Records of meetings and communications
- Consents you provide
- Information relevant to safeguarding or welfare
- Financial information where payments are required

Why We Collect It

We use this information to:

- Deliver educational provision
- Keep your child safe
- Contact you regarding your child's education and wellbeing
- Respond to emergencies
- Monitor attendance and progress
- Meet safeguarding responsibilities
- Comply with legal obligations
- Work with referring schools and Local Authorities

Who We May Share Information With

Where appropriate, information may be shared with:

- Referring schools
- Local Authorities
- Health professionals
- Social Care
- Educational psychologists
- Examination bodies
- Emergency services
- Other agencies involved in supporting your child

Information is shared only where there is a lawful reason to do so.

How Long We Keep Information

Records are retained in accordance with legal requirements and recognised retention schedules.

Your Rights

You have the right to:

- Request access to your information
- Request corrections
- Request restrictions in certain circumstances
- Raise concerns regarding how information is used
- Complain to the Information Commissioner's Office (ICO)

Privacy Notice for Learners

At Brightfield Academy, we keep information about you so we can help you learn, stay safe and achieve your goals.

What Information We Keep

We may keep information such as:

- Your name
- Date of birth
- Attendance
- Learning progress
- Behaviour records
- Medical information
- Emergency contacts
- EHCP or SEND information
- Safeguarding information where necessary

Why We Keep It

We use your information to:

- Help you learn
- Keep you safe
- Support your wellbeing
- Plan your learning
- Celebrate your progress
- Meet our legal responsibilities

Keeping Your Information Safe

Only people who need your information to support you will normally be able to access it. Sometimes we may have to share information if we believe someone is at risk of harm or where the law requires us to do so.

Your Rights

You can ask questions about the information we hold about you.

If you are old enough, you may ask to see your information or ask us to correct anything that is inaccurate.

We will always explain things in a way that is appropriate for your age and understanding.

Privacy Notice for Staff

Brightfield Academy collects personal information about employees to support recruitment, employment, safeguarding and legal obligations.

Information We Collect

This may include:

- Contact details
- Qualifications
- Employment history
- References
- DBS information
- Right to work documentation
- Payroll information
- Pension details
- Training records
- Performance management records
- Supervision records
- Occupational health information
- Absence records
- Emergency contact information

Why We Process Staff Information

We process information to:

- Recruit staff safely
- Manage employment contracts
- Pay salaries and pensions
- Meet safeguarding obligations
- Deliver training
- Maintain professional records
- Comply with employment legislation
- Ensure health and safety
- Support staff wellbeing

Sharing Information

Information may be shared where appropriate with:

- Payroll providers
- Pension providers
- HM Revenue & Customs
- Disclosure and Barring Service
- Occupational Health providers
- Regulatory bodies
- Local Authorities
- Legal advisers where necessary

Employment Records

Employment records are retained in accordance with employment legislation and recognised retention schedules.

Former employees may request access to personal information in accordance with UK GDPR.

Confidentiality

All employment information is handled confidentially and is accessible only to authorised personnel with a legitimate business need.

Privacy Notice for Job Applicants

Brightfield Academy is committed to fair, transparent and safer recruitment. During the recruitment process we collect personal information to assess applicants' suitability for employment or voluntary roles.

Information We Collect

This may include:

- Name and contact details
- Curriculum Vitae (CV)
- Employment history
- Qualifications
- Professional memberships
- References
- Interview notes
- Right to work documentation
- DBS information (where appropriate)
- Equality monitoring information (where voluntarily provided)

Why We Collect It

We process this information to:

- Assess suitability for employment
- Conduct safer recruitment checks
- Verify qualifications and experience
- Arrange interviews
- Comply with employment and safeguarding legislation
- Maintain recruitment records

Unsuccessful Applications

Information relating to unsuccessful applicants will normally be retained only for the period necessary to meet legal and operational requirements before being securely destroyed.

Privacy Notice for Volunteers

Volunteers play an important role within Brightfield Academy. We collect personal information to ensure that volunteering is safe, appropriate and well supported.

Information We Collect

- Contact details
- Emergency contacts
- DBS information where required
- References
- Relevant qualifications
- Training records
- Safeguarding declarations

Why We Collect It

We use this information to:

- Recruit volunteers safely
- Meet safeguarding requirements
- Allocate suitable roles
- Contact volunteers
- Maintain appropriate supervision and support

Volunteer records are treated with the same level of confidentiality as employee records.

Privacy Notice for Visitors

To help maintain a safe environment for everyone, Brightfield Academy collects limited information about visitors.

Information We May Collect

- Name
- Organisation
- Vehicle registration (where appropriate)
- Time of arrival and departure
- Purpose of visit
- Signature
- CCTV images where applicable

Why We Collect It

This information helps us to:

- Safeguard learners and staff
- Manage site security
- Respond during emergencies
- Meet health and safety obligations
- Investigate incidents where necessary

Visitor records are retained only for appropriate operational periods before secure disposal.

Website Privacy & Cookies Notice

Brightfield Academy's website may collect limited technical information when visitors browse our pages.

This may include:

- IP address

- Browser type
- Device information
- Pages visited
- Time spent on pages
- Website performance data

Cookies

Cookies are small files placed on your device to improve your browsing experience.

Brightfield Academy may use cookies to:

- Remember website preferences
- Improve website performance
- Understand how visitors use our website
- Maintain website security

Where required by law, users will be asked to consent to non-essential cookies.

Users can also manage cookie preferences through their internet browser settings.

Contact Forms

If you submit an enquiry through our website, we will use the information you provide solely to respond to your enquiry unless you have requested further contact.

We do not sell or share website user information for marketing purposes.

15. Contact Details

Questions regarding this Privacy Policy or the way Brightfield Academy processes personal information should be directed to:

Data Protection Lead

Brightfield Academy

Email: nik@brightfieldacademy.co.uk

Telephone: 07395111919

Individuals wishing to exercise their rights under UK GDPR are encouraged to contact us in the first instance.

16. Complaints

Brightfield Academy takes concerns regarding privacy and data protection seriously.

If you have concerns about how your personal information has been handled, please contact the Data Protection Lead so that we can investigate and resolve the matter wherever possible.

If you remain dissatisfied, you have the right to complain to:

Information Commissioner's Office (ICO)

Website: www.ico.org.uk

Telephone: 0303 123 1113

Post:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Complaints should normally be raised with Brightfield Academy first to allow an opportunity for concerns to be resolved.

Appendix A – Categories of Personal Information

Brightfield Academy may process the following categories of information:

- Personal identification details
- Contact information
- Educational records
- Attendance records
- SEND information
- Medical information
- Safeguarding information
- Employment records
- Financial information
- CCTV images (where applicable)
- Website usage information

Appendix B – Data Retention Summary

Brightfield Academy follows recognised retention schedules published by the Information and Records Management Society (IRMS), the Department for Education and relevant legislation.

Examples include:

- Learner records retained in accordance with statutory education retention requirements.
- Safeguarding records retained in line with current safeguarding guidance.
- Staff personnel files retained in accordance with employment legislation.
- Accident records retained in accordance with health and safety requirements.
- Recruitment records retained for appropriate legal periods.
- Financial records retained in accordance with HM Revenue & Customs (HMRC) requirements.

Detailed retention schedules are maintained separately by Brightfield Academy.

Appendix C – Your UK GDPR Rights

You have the right to:

- Be informed.
- Access your personal information.
- Request correction of inaccurate information.
- Request erasure where appropriate.
- Restrict processing in certain circumstances.
- Receive portable copies of your information where applicable.
- Object to certain processing.
- Challenge automated decision-making where relevant.

Appendix D – Definitions

Personal Data

Information relating to an identifiable living person.

Processing

Any operation carried out on personal information, including collection, storage, use, sharing or deletion.

Special Category Data

Particularly sensitive information requiring additional legal protection, such as health information or data relating to ethnicity.

Data Controller

The organisation responsible for deciding how personal information is processed. For the purposes of this policy, Brightfield Academy is the Data Controller.

Appendix E – Document Control

Document Title: Privacy Policy & Privacy Notices

Policy Owner: Directors

Applies To: All staff, volunteers, learners, parents, carers, contractors and visitors

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