

**PRIVACY NOTICE**  
for  
**GOUDHURST & KILNDOWN CHURCH OF ENGLAND**  
**PRIMARY SCHOOL**

## **Information for Pupils, Parents and Carers – How we use your information**

**Goudhurst & Kilndown Church of England Primary School** collects, uses and is responsible for certain personal information about its pupils. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as **'data controller'** of that personal information for the purposes of those laws. We collect information from you and may receive information about your child from their previous school.

### **The lawful basis on which we use this information**

We collect and use **pupil information** under section 537A of the Education Act 1996, and section 83 of the Children Act 1989. We also comply with Article 6(1)(c) and Article 9(2)(b) of the General Data Protection Regulation (GDPR).

We only collect and use pupils' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest

Less commonly, we may also process pupils' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use pupils' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using pupils' personal data overlap, and there may be several grounds which justify our use of this data.

### **Why do we collect and use your information**

We need to use pupil data:

- Support pupil learning
- Monitor and report on pupil progress
- Moderate teacher assessment judgements
- Provide appropriate pastoral care and support services
- Assess the quality of our services
- Comply with the law regarding data sharing
- Support you to decide what to do after you leave school

- Support or improve educational provision
- Ensure no children are missing education
- Support children at risk of permanent exclusion
- Support the primary, secondary and in-year admissions process
- Safeguard children and young people
- Improve the education and services we provide

## Categories of pupil information that we collect, hold and share include:

- Personal information (such as name, unique pupil number and contact details)
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- National curriculum assessment results
- Exclusion Information
- Photographs and Video Images
- Behaviour Records
- Accident reporting and First Aid Records
- Special educational needs information
- Relevant medical information including physical and mental health and dietary information
- CCTV Images captured in school
- Relevant safeguarding information.

We also need to collect and hold limited information for each pupil about their **parents and carers** (such as names and contact details). We use this information for the School to communicate with parents and carers and to provide appropriate pastoral care. We also use this information to send communications to parents and carers on behalf of organisations associated with the School.

## Collecting your information

We collect **pupil information** from you and may also receive information about pupils from their pre-school or previous school, local authority and/or the Department for education (DfE). Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

We collect **parents and carers** information from you and may also receive information from the local authority (such as in connection with admissions requests).

**It is essential that the contact information we hold about parents and carers is accurate and up to date and we ask you to advise us immediately of any changes.**

## Storing your information

**Goudhurst & Kildown Church of England Primary School** keeps **pupil information** on computer systems and also sometimes on paper.

Information about **parents and carers** is connected with pupils' records on our computer systems and kept on a paper contact list in the School office while your children are at the School. Electronic records are transferred to the new school with the pupil records and paper contact lists are safely destroyed as they are updated. We may retain limited access to information about parents and carers of former pupils through our limited access to former pupils' records, as described above

We only retain limited access to electronic records of former pupils and only retain hard copy records of information about former pupils in situations where and for as long as there is a legal requirement to do so.

There are strict controls on who can see pupil information. We will not share pupil data if you have advised us that you do not want it shared unless it is the only way we can make sure pupils stay safe and healthy or we are legally required to do so.

## How long your personal data will be kept

We will hold your personal information securely and retain it from the child/young person's date of birth until they reach the age of 25, after which the information is archived or securely destroyed.

Our record retention schedule sets out how long we keep archived information about pupils. A copy of this document can be obtained on request from the School office.

## Who do we share your information with?

We do not share **pupil information** with anyone without consent unless the law and our policies allow us to do so.

- Department for Education (DfE) (statutory for school funding and educational attainment policy and monitoring) and other government agencies and local authorities as required (e.g. to resolve funding queries)
- Kent County Council teams working to improve outcomes for children and young people
- Commissioned providers of local authority services (such as education services)
- Schools or colleges that you attend after leaving us
- Local forums with schools and KCC representatives which support in-year fair access processes and support managed moves between schools
- Local multi-agency forums which provide SEND advice, support and guidance (such as Local Inclusion Forum Team (LIFT))
- Partner organisations signed up to the Kent & Medway Information Sharing Agreement, where necessary, which may include Police, school nurses, doctors and mental health workers and Kent Community Health NHS Foundation Trust
- Schools in our local collaboration, to enable the moderation of pupil assessment outcomes, to support collaborative working through joint analysis, and ensure children continue to receive appropriate education provision
- KCC has to share information with external moderators (teachers with recent relevant

experience) of end of key stage assessments, to meet statutory requirements from the Standards & Testing Agency (STA)

- Our commissioned providers of pupil assessment tests, the National Foundation for Educational Research (NFER), GL assessments and 2 Build a Profile
- Our commissioned provider of pupil attainment and progress tracking systems, Target Tracker.
- Our commissioned provider of Sports Coaching Services, Premier Sports
- School appointed providers of after School clubs where consent has been given.
- Our regulator, Ofsted
- Third-party providers of information & communication services (such as Study Bugs, Call Parents) where consent has been given
- Contracted providers of services (such as school photographers and our catering providers, Contract Dining Company) where consent has been given
- We share limited information with Professional Bodies, Advisors and Consultants
- Where we use educational websites or Apps as part of class work or homework, we may also share very limited information about pupils (such as first name and first letter of surname) with the relevant providers, in order to create separate accounts for each pupil. We ensure that such companies are compliant with the GDPR Regulations.

We will share personal information with law enforcement or other authorities if required by applicable law.

## Why we share your information

We only share your information to the extent that we believe is necessary to comply with our legal responsibilities and to run a safe and efficient School. We always seek to ensure that any data shared is adequately protected through appropriate security measures and (where relevant) contractual protections.

We share **pupil information** on a statutory basis which underpins school funding and educational attainment policy and monitoring. We are in particular required to share information about our pupils with ESCC and the DfE under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

## The National Pupil Database (NPD)

The NPD is owned and managed by the DfE 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 DfE. 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.

The DfE 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 DfE 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.

## Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

## Requesting access to your personal data

Under the General Data Protection Regulations, parents and carers / pupils have the right to:

- Know what we are doing with your information and why we are doing it
- Ask to see what information we hold about you (**Subject Access Requests**)
- Ask us to correct any mistakes in the information we hold about you
- Object to direct marketing
- Make a complaint to the Information Commissioners Office
- Withdraw consent (if applicable)

Depending on our reason for using your information you may also be entitled to:

- Ask us to delete information we hold about you
- Have your information transferred electronically to yourself or to another organisation
- Object to decisions being made that significantly affect you
- Object to how we are using your information
- Stop us using your information in certain ways

We will always seek to comply with your request however we may be required to hold or use your information to comply with legal duties. Please note: your request may delay or prevent us delivering a service to you.

For further information about your rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioners Office (ICO) on individuals' rights under the General Data Protection Regulation

If you make a **subject access request**, and if we do hold information about you or your child, we will:

- 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 or your child
- 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

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

## Who to Contact and Where to go for Further Information

To exercise any of your rights, or if you have a complaint about why your information has been collected, how it has been used or how long we have kept it for, please contact:

**School Contact:** To make a request for your personal information, or be given access to your child's educational record, contact the School Office.

### Goudhurst & Kildown Church of England Primary School

Beaman Close  
Cranbrook Road  
Goudhurst  
Kent  
TN17 1DZ  
Tel. 01580 211365  
e. [office@goudhurst-kildown.kent.sch.uk](mailto:office@goudhurst-kildown.kent.sch.uk)

If you would like to get a copy of the information about you that **Kent County Council** shares with the DfE or post-16 providers or how they use your information, please contact the Information Resilience and Transparency Team at [data.protection@kent.gov.uk](mailto:data.protection@kent.gov.uk).

For more information about services for children and young people, please go to: <http://www.kent.gov.uk/education-and-children> or the KCC website at [www.kent.gov.uk](http://www.kent.gov.uk)

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is **the Information Commissioner** who may be contacted at <https://ico.org.uk/concerns> or telephone 03031 231113.

For further information visit <https://www.kent.gov.uk/about-the-council/about-the-website/privacy-statement>

For further information about how the Department for Education uses your information:

To find out more about the pupil information we share with the DfE, for the purpose of data collections, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

For more information about the DfE'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 DfE: <https://www.gov.uk/contact-dfe>

## Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## Data Protection Officer

The appointed Data Protection Officer for Goudhurst & Kilndown Church of England Primary School is:

**Satswana Ltd**

e. [info@satswana.com](mailto:info@satswana.com)

tel. 01252 516898

Registered Office:

Pembroke House, St Christopher's Place, Farnborough, Hampshire, GU14 0NH.