

**PRIVACY NOTICE**  
**for**  
Hythe Bay Church of England Primary School



**HYTHE BAY**  
Church of England  
Primary School and  
Children's Centre

Anchored by God, we strive to teach children to be confident, connected, and creative through outstanding teaching and care. We show our love, tolerance, forgiveness, and compassion, not just by talking about them but living them each day of our lives.

"We should love people not only with words and talk but by actions and true caring."

1 John 3: 18

Our vision is to be a Spirit- filled community where every individual flourishes and is respected.

Our Christian values allow us to be an inclusive school which, through our learning, strives to give everyone life in all its fullness.

Within our local and global culture of continuous learning and reflection, we aim to deliver a broad and ambitious curriculum to all children in our care.

### **Privacy Notice – How we use pupil information**

#### **The categories of pupil information that we process include:**

- personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- characteristics (such as ethnicity, language, and free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- special educational needs (including the needs and ranking)
- medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (such as phonics results and any relevant results)
- behavioural information (such as exclusions and any relevant alternative provision put in place).

This list is not exhaustive, to access the current list of categories of information we process please see school website [www.hythebay.kent.sch.uk](http://www.hythebay.kent.sch.uk)

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

We collect and use pupil information under section 537A of the Education Act 1996, and section 83 of the Children Act 1989.

We collect and use pupil information, for the following purposes:

- a) to support pupil learning
- b) to monitor and report on pupil attainment progress
- c) to provide appropriate pastoral care
- d) to assess the quality of our services
- e) to keep children safe (food allergies, or emergency contact details)

- f) to meet the statutory duties placed upon us for the Department for Education (DfE) data collections
- g) to comply with the law regarding data sharing
- h) to support you to decide what to do after you leave school.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing pupil information are:

We also comply with Article 6(1)(e) and Article 9(2)(b) of the UK General Data Protection Regulation (UK GDPR).

### **Collecting pupil information**

We collect pupil information via data collection, registration forms and Common Transfer File (CTF) from previous school.

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this.

### **Storing pupil information**

Hythe Bay Church of England Primary School keeps information about you on computer systems and also sometimes on paper.

We hold your education records securely until you change school. Your records will then be transferred to your new school, where they will be retained until you reach the age of 25, after which they are safely destroyed.

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

### **Who do we share pupil information with?**

We routinely share pupil information with:

- schools or colleges that the pupils attend after leaving us
- our local authority (Kent County Council) and their commissioned providers of local authority services
- the Department for Education (DfE)
- our payment record system provider (Tucasi)
- our school communication (parent text/email) provider, Groupcall via EiS
- our school meals provider and milk provider
- the NHS school nursing team
- other multi-agencies such as Specialist Teaching and Learning Service
- our progress tracking systems which include Sonar
- our secure pupil database, ESS SIMs
- our safeguarding and behaviour recording system, CPOMS
- our third party applications management system, Wonde. This system provides additional level of protection and management of access by third parties.

We may also share limited pupil data with local schools to enable the moderation of pupil assessment outcomes and to support collaborative working through joint

analysis.

### **Department for Education (DfE)**

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our pupils with the Department for Education (DfE) either directly or via our local authority for the purpose of those data collections, under:

- section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

All data is transferred securely and held by the Department for Education (DfE) under a combination of software and hardware controls, which meet the current [government security policy framework](#).

For more information, please see 'How Government uses your data' section. For privacy information on the data the Department for Education collects and uses, please see: <https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3>

### **Requesting access to your personal data**

The UK-GDPR gives parents and pupils certain rights about how their information is collected and used. To make a request for your personal information, or be given access to your child's educational record, contact:

Rebecca Prout  
Headteacher  
[headteacher@hythebay.kent.sch.uk](mailto:headteacher@hythebay.kent.sch.uk)  
01303 267802

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of your personal information we have about you – this is called 'right of access', this is also known as a subject access request (SAR), data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'.
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to complain to the Information Commissioner if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at [raise a concern with ICO](#).

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

### **Last updated**

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated on 17<sup>th</sup> October 2024.

### **Contact**

If you would like to discuss anything in this privacy notice, in the first instance, please contact:

Rebecca Prout  
Headteacher  
[headteacher@hythebay.kent.sch.uk](mailto:headteacher@hythebay.kent.sch.uk)  
01303 267802

Or

Data Protection Officer – Mr Charles Joseph  
Brockhill Park School  
Sandling Road  
Saltwood  
Hythe  
Kent  
CT21 4HL  
[office@brockhill.kent.sch.uk](mailto:office@brockhill.kent.sch.uk)

### **How Government uses your data**

The pupil data that we lawfully share with the the Department for Education (DfE) through data collections:

- underpins school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- informs 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).

- supports 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

## **Data collection requirements**

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

## **The National Pupil Database (NPD)**

The NPD is owned and managed by the Department for Education (DfE) and contains information about pupils in schools in England. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

The data in the NPD is provided as part of the operation of the education system and is used for research and statistical purposes to improve, and promote, the education and well-being of children in England.

The evidence and data provide DfE, education providers, Parliament and the wider public with a clear picture of how the education and children's services sectors are working in order to better target, and evaluate, policy interventions to help ensure all children are kept safe from harm and receive the best possible education.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-npd-privacy-notice/national-pupil-database-npd-privacy-notice>

## **Sharing by the Department for Education (DfE)**

DfE will only share pupils' personal data where it is lawful, secure and ethical to do so. Where these conditions are met, the law allows the Department for Education (DfE) to share pupils' personal data with certain third parties, including:

- schools and local authorities
- researchers
- organisations connected with promoting the education or wellbeing of children in England
- other government departments and agencies
- organisations fighting or identifying crime

For more information about the Department for Education's (DfE) NPD data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

Organisations fighting or identifying crime may use their legal powers to contact the Department for Education (DfE) to request access to individual level information relevant to detecting that crime.

For information about which organisations the Department for Education (DfE) has provided pupil information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the Police please visit the

following website: <https://www.gov.uk/government/publications/dfe-external-data-shares>

## **How to find out what personal information the Department for Education (DfE) holds about you**

Under the terms of the UK GDPR, you are entitled to ask the Department for Education (DfE):

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department for Education (DfE), you should make a 'subject access request'. Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

or

<https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>

Approved by the Resources Committee on Monday 21<sup>st</sup> October 2024.

Ratified by the Full Governing Body on Thursday 7<sup>th</sup> November 2024.