

# Privacy Notice for pupils



## Privacy Notice for pupils: provided to parents and carers

This letter is about how we use information about you and our pupils and what we do with it. We call this information 'personal data' or 'personal information.'

### Who we are

Holly Lodge Primary School is part of the Kite Academy Trust. The Academy Trust is the organisation which is in charge of your personal information. This means the Kite Academy Trust is called the Data Controller.

The postal address of the Academy Trust Central Office is: Holly Lodge School, Stratford Road, Ash Vale, Surrey, GU12 5PX.

If you want to contact us about your personal information you should contact your school administration office in the first instance. The Kite Academy Trust Data Protection Officer is Jayne Godolphin, she can be contacted by email: [dpo@kite.academy](mailto:dpo@kite.academy) . By telephone: 07874 186202.

### How we use pupil information

We [the Kite Academy Trust] collect and hold personal information relating to our pupils and may also receive information about them from their previous school, local authority and / or the Department for Education (DfE). We use this personal data to:

- support individual learning
- monitor and report on individual progress
- provide appropriate care for our pupils; and
- assess the quality of our services
- to comply with the law about sharing personal data

This information will include name, contact details, national curriculum assessment results, attendance information, any exclusion information, where our pupils go after they leave us and personal characteristics such as ethnic group, any special educational needs our pupils may have as well as relevant medical information. We will also use photographs of pupils. More details about this are in our photograph policy. This policy can be found on our Kite website or obtained from the school office.

The use of this information for these purposes is lawful for the following reasons:

- The Kite Academy Trust is under a legal obligation to collect the information or the information is necessary for us to meet legal requirements imposed upon us such as our duty to safeguard pupils.
- It is necessary for us to hold and use information for the purposes of our functions in providing schooling and so we can look after our pupils. This is a function which is in the public interest because everybody needs to have an education. This means we have a real and proper reasons to use your information.
- We will not usually need your consent to use your information. However, if at any time it appears to us that we would like to use your personal data in a way which means

that we would need your consent then we will explain to you what we want to do and ask you for consent. This is most likely to be when we are involved in activities which are not really part of our job as an Academy Trust, but we are involved because we think it would benefit our pupils. If you give your consent, you may change your mind at any time.

When we collect personal information on our forms, we will make it clear whether there is a legal requirement for you to provide it, whether there is a legal requirement on the academy trust to collect it. If there is no legal requirement then we will explain why we need it and what the consequences are if it is not provided.

### **When we give your information to others**

We will not give information about our pupils to anyone without your consent unless the law and our policies allow us to do so. If you want to receive a copy of the information about you that we hold, please contact:

The school office on 01252 548390 or [office@holly-lodge.surrey.sch.uk](mailto:office@holly-lodge.surrey.sch.uk)

We are required, by law (under regulation 5 of the Education (Information about Individual Pupils) England Regulations 2013, to pass some information about our pupils to the Department for Education (DfE). This information may, in turn, then be made available for use by the Local Authority.

The DfE may also share information about pupils that we give to them, with other people or organisations. This will only take place where the law, including the law about data protection allows it.

#### **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 pupil information we share with the department, 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 [National pupil database: user guide and supporting information - GOV.UK](#).

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

We will be sharing your child's data with you to enable you to understand the educational progress of your child. Where appropriate, we will listen to your child's views regarding the sharing of their data. We will also take family circumstances into account, in particular where a Court has decided what information a parent is allowed to have.

We will, where appropriate also disclose your personal data to:

- Your child's new school if you move schools
- Disclosures connected with SEN support – e.g. non-LA professionals
- School nurse/ immunisation team
- CAMHS (Child and Adolescent Mental Health Service)

This is not an exhaustive list.

The information disclosed to these people / services will include sensitive personal information about your child. Usually this means information about health and any special educational needs or disabilities which your child may have. We do this because these people need the information so that they can support you and your child.

Our disclosure of personal data is lawful for the following reasons:

- The Academy Trust is under a legal obligation to disclose the information or disclosing the information is necessary for us to meet legal requirements imposed upon us such as our duty to look after our pupils and protect them from harm.
- It is necessary for us to disclose your information for the purposes of our functions in providing schooling. This is a function which is in the public interest.
- We have a legitimate interest in disclosing your information because it is necessary in order to provide our pupils with education and pastoral care and connected purposes as outlined above.
- We will not usually need consent to disclose pupil information. However, if at any time it appears to us that we would need consent then this will be sought before a disclosure is made.

We do not normally transfer personal information to a different country which is outside the European Economic Area. This would only happen if one parent lives abroad or if your child moves to a new school abroad. If this happens we will be very careful to make sure that it is safe to transfer your information. We will look at whether that other country has good data protection laws for example. If we cannot be sure that it is safe, then we will talk to you about it and make sure that you are happy for us to send your information. As this is not something we normally do, and we don't know which country we might need to send your information to, we cannot tell you more about it now but if we want to transfer your data to a different country then we will tell you whether or not we think it is safe and why we have decided that.

## **Fundraising & Marketing**

The Academy may make use of or transfer limited personal data (such as contact details) relating to pupils, and their parents or carers to an association, society or club set up for the purpose of fundraising or extra-curricular activities, where there is a legitimate interest to do so.

## **How long we keep your information**

We only keep your information for as long as we need to or for as long as the law requires us to. Most of the information we have will be in our pupil file. We keep these until the pupil moves to another school when we send the pupil file to your child's new school. We have a policy which explains how long we keep information. It is called a Records Retention Policy and you can find it on our website or ask for a copy from the school office.

## **Your rights:**

- You can ask us for a copy of the information we have about you
- You can ask us to correct any information we have about you if you think it is wrong
- You can ask us to erase information about you (although we may have good reasons why we cannot do this)
- You can ask us to limit what we are doing with your information
- You can object to what we are doing with your information
- You can ask us to transfer your information to another organisation in a format that makes it easy for them to use.

There is more information in our Data Protection Policy which can be found on our website or you can ask for a copy from the school office.

You can complain about what we do with your personal information to the Kite Data Protection Officer at [dpo@kite.academy](mailto:dpo@kite.academy) . If you are not happy with our answer to your complaint, then you can complain to the Information Commissioner's Office:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.