



Lady Boswell's C.E. (Aided) Primary School

*Learning Together,
Christ at the centre,
Learning for Life*

**PRIVACY NOTICE
(PUPILS)**

Date of Notice: December 2025

Date of Next Review: December 2026

Notice to be authorised by: SLT

Notice approved: December 2025

Signature:

Author of Policy: Business Manager
(template from gov.uk website)

We value every member of our community as a unique child of God and seek to demonstrate His love through our words and actions. We enable every child to achieve their full potential so that they leave us with their heads inspired and their hearts enriched.

As a result, our children will:

Develop a positive sense of self and well-being; confident to make the right choices and keep themselves safe in an ever-changing society

Strive for academic excellence, developing a thirst for knowledge and a love of learning

Become effective communicators, collaborators and leaders

Be resilient, resourceful and courageous

Be curious, creative individuals and confident problem solvers

Grow in spiritual awareness and develop a strong moral compass and a deepening understanding of the Christian faith in a multi-faith British society

Become responsible and tolerant global citizens who value diversity, forgive readily, and have concern for the needs of each other, the school, the wider community, and the planet.

Privacy Notice for Lady Boswell's C.E. (Aided) Primary School

This notice explains what personal data (information) we hold about you, how we collect, how we use and may share information about you. We are required to give you this information under data protection law.

Who are we?

Lady Boswell's C.E. (Aided) Primary School collects, uses and is responsible for certain personal information about you. 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 'controller' of that personal information for the purposes of those laws. Our Data Protection Officer is provided by Satswana Limited, Suite G12 Ferneberga House, Alexandra Road, Farnborough, Hampshire, GU14 6DQ

The categories of pupil information that we process include:

- Personal information (such as name, unique pupil number, contact details language, nationality, country of birth, and free school meal eligibility)
- 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 information (such as sessions attended, number of absences, absence reasons and any previous schools attended).
- Assessment and attainment (such as foundation profile, phonics results and key stage results)
- Behavioural information (such as exclusions and any relevant alternative provision put in place)

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

- Under section 537A of the Education Act 1996
- Under section 83 of the Children Act 1989
- Under article 9 of UK GDPR

How we use your personal information

We use your personal information to:

- 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
- Keep Children Safe (food allergies and contact details)
- 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

Collecting pupil information

We collect pupil information via registration forms at the start of school and Common Transfer Files (CTF) or secure file transfer 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 data

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.

Reasons we can collect and use your personal information

If there is processing or sharing that relies on your consent, we will make this clear to you and ensure we seek your consent.

Who we share your personal information with

- 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).
- Third-party providers of information services (such as Arbor, school interviews) where consent has been given.
- Contracted providers of services (such as school photographers and catering providers) where consent has been given.

Why we regularly share pupil information

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

Department for Education (DFE)

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 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.

The DfE may share information about our pupils from the NPD, where it is lawful and ethical to do so, with third parties who promote the education or well-being of children in England 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

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.

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 the School office on office@ladyboswells.kent.sch.uk

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 personal information we have about you – this is called 'right of access', this is also known as a subject access request, data subject access 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, If the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent.

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 would like to exercise a right, please contact the office or our Data Protection Officer: Satswana, Suite G12 Ferneberga House, Alexandra Road, Farnborough, Hampshire, GU14 6DQ. 01252 759177, info@satswana.com.

Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting office@ladyboswells.kent.sch.uk.

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.

Contact

Please contact the school office or Satswana Limited (info@satswana.com) 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.

How the Government uses your data

The pupil data that we lawfully share with 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
- Supports 'longer-term' research and monitoring of educational policy

If you would like to get a copy of the information about you that KCC 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.

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

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>

The National Pupil Database (NPD)

The NPD is owned and managed by the 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.

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>