



Privacy Notice for Pupils and Parents

This Privacy Notice is intended to provide you with information about how and why we process pupil and parent information. It is intended to provide you with information required under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA), and the Data (Use and Access) Act 2025 (DUAA).

Egerton Church of England Primary School is the "data controller" for the purposes of Data Protection law and is registered with the Information Commissioner's Office, reg no. Z7322463.

Our Data Protection Officer is Andy Crow, dpo@dpoforeducation.co.uk. The school has a data champion, Mrs Sue Hubbard (SBM), who can be contacted in the first instance at sbm@egerton.kent.sch.uk or 01233 756274.

The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about pupils and parents includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents
- Bank account details for payments or fee/trip processing
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Characteristics, such as eligibility for free school meals, or special educational needs
- Exclusion information
- Behaviour records and management plans
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Health information, care plans and medication records
- Body maps and accident / injury records
- Photographs

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Health, including any medical conditions, and sickness records
- EHCP documents, specialist reports and medical documents
- Photographs where health conditions can be determined
- SEN Data

We may also hold data about pupils that we have received from other organisations, including other schools, Ofsted, local authorities and the Department for Education.

Why we use this data

We use this data to:

- Support pupil learning
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Protect pupil welfare and fulfill our safeguarding obligations
- Carry out research and statutory reporting
- Comply with the law regarding data sharing
- Enable the school to meet the health needs of the pupil
- Assess the quality of our services and operational performance

Our legal basis for using this data

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

- We need to comply with a legal obligation
- We need to perform a task carried out in the public interest (such as providing education)
- We need to fulfill a contract with you
- We have obtained consent to use it in a certain way

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

- We need to protect the individual's vital interests (or someone else's interests)

We will send communications to parents / carers as part of the school's public task but will ask for consent for other communications sent by email and text message or for marketing/promotional purposes.

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

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

Collecting this information

While the majority of information we collect about pupils is mandatory, there is some information that can be provided voluntarily. Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

How we store this data

- We keep personal information about pupils while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. Typically, student records are retained by the school from the child's date of birth plus 25 years. Please refer to our Retention Policy for further details.
- All paper records and electronic records are securely stored and securely disposed of at the end of this period.

Data sharing

We do not share information about pupils with any third party without consent unless the law and our policies allow us to do so. Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about pupils with:

- **The Department for Education (DfE)** – to meet our legal obligations as part of data collections such as the School Census
- **The pupil's family and representatives** – in case of emergencies or health matters
- **Educators and examining bodies** – necessary for the performance of our educational functions
- **Our regulator, Ofsted** – to enable it to evaluate the education we provide, which is in the public interest
- **Local authorities**
- **Suppliers and service providers** – to enable them to provide the service we have contracted them for. This includes:
 - **ARBOR** ([Privacy Policy](#))
 - **CPOMS** ([Privacy Policy](#))
- **Follow-on schools** – which your child/ward attends after leaving our school
- **Our auditors** – to meet our finance obligations as part of statutory requirements (e.g. Annual Report and Accounts)
- **Health and social welfare organisations** – to enable us to comply with our duty of care and statutory safeguarding duties (e.g., Therapists, Clinical Psychologists, NHS, CAMHS, School Counsellors, Social Care, Educational Welfare Office, School Vaccination Service)
- **Professional bodies** – necessary for the performance of our education function
- **Police forces, courts, and tribunals** – in order to uphold law and order

National Pupil Database

We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school census. Some of this information is then stored in the [National Pupil Database \(NPD\)](#), which is owned and managed by the Department and provides evidence on school performance to inform research.

The Department for Education may share information from the NPD with other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

Transferring data internationally

We may transfer personal data that we collect from you to third-party data processors in countries outside the UK. If we do this, we ensure appropriate safeguards are in place (such as Standard Contractual Clauses / International Data Transfer Agreements or adequacy regulations) to ensure your data receives the same protection as if it were being processed in the UK.

Data Security and Confidentiality

Protecting the confidentiality and integrity of your personal data is a responsibility that we take seriously. We use appropriate technical and organisational security measures including encryption, secure access controls, and regular data protection auditing to safeguard personal records.

Use of Images and Media

Named photographs will be used for internal use where there is a clear lawful basis for doing so (i.e., for identifying pupils for medical or safeguarding requirements).

Parents / Carers will be given the opportunity to determine how the school uses their child's photo for other uses. This is done as your child starts school. Parents / Carers can also request a change at any time.

The school will ask for consent for photos to be used in:

- Publications and publicity materials produced by the school
- On our website
- In videos and promotional materials
- In local newspapers and media
- Social media (school-controlled)

Automated decision-making and profiling

The school does not use automated decision-making processes or automated profiling.

Requesting Access to Personal Data (Subject Access Requests)

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold.

The school may withhold information if its release would likely cause "serious harm" to the physical or mental health of the pupil or another person, or if it would prejudice a child protection investigation.

Under the Data (Use and Access) Act 2025 (DUAA), the following rules apply to how we process your request:

- The school is only required to conduct a "reasonable and proportionate" search for personal data. We are not required to conduct exhaustive or unlimited searches if the effort involved would be disproportionate to the request.
- We will focus our searches on specific areas or timeframes identified in your request.
- If your request is broad or unclear, we may ask you for clarification to help us locate the required data.
- Under the DUAA 2025, the one-month time limit for our response will stop ("pause") from the day we ask for clarification and will restart once we receive your response. We will always inform you if the clock is paused.
- The response timeframe does not begin until we have verified your identity (or your authority to act on behalf of your child).

Other rights

Under data protection law, individuals have rights regarding their personal data, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent data being used to send direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data corrected, deleted, or restricted
- Claim compensation for damages caused by a breach of data protection regulations

To exercise any of these rights, please contact our Data Protection Officer.

Complaints

If you think our collection or use of personal information is unfair, misleading, or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our Data Protection Officer, Andy Crow, via email at **dpo@dpoforeducation.co.uk** or via the school's data champion at **sbm@egerton.kent.sch.uk**.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- **Online:** <https://ico.org.uk/concerns/>
- **Phone:** 0303 123 1113
- **Post:** Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact us

If you have any questions or concerns, please contact our Data Champion in the first instance:

- **Email:** sbm@egerton.kent.sch.uk
- **Phone:** 01233 756274