

Privacy notice: How we use information about pupils and their families

Date: reviewed Spring 2026; next review 2028

This privacy notice explains how we collect, use, share, and protect personal information about our pupils and their families.

The relevant legislation governing data privacy in the UK is:

- The Data Protection Act 2018
- The UK General Data Protection Regulation (UK GDPR)
- The Data (Use and Access) Act 2025 (DUUA)

The categories of information that we process

The categories of pupil/family information that we process include:

- personal identifiers and contacts (such as name, unique pupil number, contact details, address)
- characteristics (such as ethnicity, language, and pupil premium/free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- special educational needs (including specific needs)
- medical and administration (such as doctors' information, child health, dental health, allergies, medication, dietary requirements)
- attendance records (such as sessions attended, number of absences, absence reasons, previous schools attended)
- assessment and attainment (such as key stage 1 phonics results)
- behavioural information (records of incidents and exclusions, and relevant alternative provision)
- online activity logs and alerts generated by our filtering and monitoring systems (including attempts to access blocked content or searches that trigger safeguarding or security alerts)

This list is not exhaustive; please see our data processing map (Record of Processing Activities - RoPA) for the current list.

Why we collect and use information about pupils and families

We collect and use pupil information and that of their families for the following purposes:

- to support pupil learning, assessment, and special educational needs as appropriate
- to monitor and report on pupil attainment and progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to keep children safe (eg food allergies or emergency contact details) and safeguard in accordance with our responsibilities under Keeping Children Safe in Education (KCSiE)
- to meet the statutory duties placed upon us for the Department for Education (DfE) data collections and health services

Collecting information from pupils and families

We collect personal information from families directly eg from admissions forms or other information you provide to school both in written and verbal form. Most data held by school will have come from you but we may hold data about you/your family from:

- local authorities
- government departments or agencies
- previous school/nursery or educational establishment
- police forces, courts, or tribunals (if applicable)

Data is essential for the school to function. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with UK GDPR, we will inform you at the point of collection whether you are required to provide certain information to us or if you have a choice in this and that you can change your mind at any time.

Legal bases for processing

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

- Article 6 (1)(c): processing is necessary for compliance with a legal obligation to which the controller is subject
- Article 6 (1)(e): processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority
- For special category data, we rely on:
 - Article 9 (2)(a): the data subject has given explicit consent to the processing for specified purposes
 - Article 9 (2)(c): to protect the vital interests of the individual
 - Article 9 (2)(f): legitimate purposes involving legal claims
 - Article 9 (2)(i): required for purposes of public health

Storing information about pupils and families

We hold pupil data securely for the time specified in our data retention schedule. We have adopted the Information and Records Management Society (IRMS) recommendations. For more information, please see our Data Protection Policy and the [Information and Records Management \(IRMS\) Toolkit for Schools](#).

Who we share information about pupils and families with

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- the local authority
- Department for Education (DfE)
- National Health Service
- targeted and family support services
- police
- courts and the Children and Family Court Advisory and Support Service (Cafcass)
- service providers (such as Data Protection, HR, and IT support services where appropriate)

This list is not exhaustive.

Why we regularly share pupil information

We do not share information about our pupils without consent unless the law and our policies allow us to do so. For example, we must share pupil information in accordance with the Education (Pupil Information) (England) Regulations 2005 and Keeping Children Safe in Education statutory guidance.

Withdrawal of consent

Where we process 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

- the Sphere Federation Resources Manager: srm@spherefederation.org
or
- the Data Protection Officer, Richard Lewis-Ogden: DPO@bywaterkent.co.uk

Data retention

We hold pupil data securely for the duration specified in our data retention schedule, following the IRMS guidelines.

Right to access

Parents and pupils have the right to request access to information about them that we hold. To make a request, please contact:

- the Sphere Federation Resources Manager: srm@spherefederation.org
or
- the Data Protection Officer, Richard Lewis-Ogden: DPO@bywaterkent.co.uk

Complaints

If you wish to raise a complaint about how the school manages your personal data, please refer to our Data Protection Policy for further information on the complaints process.