



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

Who we are?

Littlebourne Church of England Primary School collects, uses and is responsible for certain personal information about you and your child. The information we collect is regulated under the United Kingdom General Data Protection Regulation (UK GDPR) and The Data Protection Act 2018 (DPA).

Littlebourne Church of England Primary School as the Data Controller will comply with its obligations under the UK GDPR and DPA. The school is committed to being concise, clear and transparent about how it obtains and uses personal information and will ensure data subjects are aware of their rights under the legislation.

Our DPO is: Satswana Ltd, Pembroke House, St Christopher's Place, Farnborough, Hampshire GU14 0NH. Telephone 01252 516898. Email info@satswana.com

The Principles set out in the UK GDPR must be adhered to when processing personal data:

1. Personal data must be processed lawfully, fairly and in a transparent manner (**lawfulness, fairness and transparency**).
2. Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (**purpose limitation**).
3. Personal data shall be adequate, relevant and limited to what is necessary in relation to the purpose(s) for which they are processed (**data minimisation**).
4. Personal data shall be accurate and where necessary kept up to date and every reasonable step must be taken to ensure that personal data that are inaccurate are erased or rectified without delay (**accuracy**).
5. Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purpose for which the personal data is processed (**storage limitation**).
6. Appropriate technical and organisational measures shall be taken to safeguard the rights and freedoms of the data subject and to ensure that personal information is processed in a manner that ensures appropriate security of the personal data and protects against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data (**integrity and confidentiality**).



Information collected by us

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

- 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 key stage 1 and phonics results, post 16 courses enrolled for and any relevant results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)

We may also collect, use, store and share (when appropriate) information about your child that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- Any medical conditions we need to be aware of, including physical and mental health
- Photographs captured in school
- Characteristics, such special educational needs

We may also hold data about your child that we have received from other organisations, including other schools and social services.

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
- Support you to decide what to do after you leave school
- Support or improve education provision
- Ensure no children are missing education
- Support children at risk of permanent exclusion
- Support the primary, secondary and in-year admissions process
- Safeguarding children and young people



- Improve the education and services we provide.

Storage and retention of personal information

Personal data will be kept securely in accordance with the school's data protection obligations. Personal data should not be retained for any longer than necessary. The length of time data should be retained will depend upon the circumstances, including the reasons why personal data was obtained. Staff should adhere to the KCC Information Management Toolkit for Schools on KELSI with reference to the Record Retention Schedule, available at the following link: <https://www.kelsi.org.uk/news-and-events/news/primary/updated-version-of-the-information-management-toolkit-for-schools>

Reasons why we collect and use your personal information

We collect and use pupil information under section 537A of the Education Act 1996, section 83 of the Children's Act 1989, and to carry out tasks in the public interest. If we need to collect special category (sensitive) personal information, we rely upon reasons of substantial public interest (equality of opportunity or treatment).

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 issues)
- Kent County Council teams working to improve outcomes for children and 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, 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 student apps) where consent has been given



- Contracted providers of services (such as school photographers and catering providers) where consent has been given

We will share personal information with law enforcement or other authorities if required by applicable law.

We are required to share information about our pupils with KCC and the Department of Education (DfE) under section 3 of The Education (Information About Individual Pupils) (England) regulations 2013.

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 and early years 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 database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The Department for Education may share information from the NPD with third parties, such as other organisations which promote children's education or wellbeing in England. These third parties must agree to strict terms and conditions about how they will use the data. For more information, see the Department's webpage on [how it collects and shares research data](#).

You can also [contact the Department for Education](#) with any further questions about the NPD.

Your Rights

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them. This includes:

- Confirmation that their personal data is being processed
- Access to a copy of the data
- The purposes of the data processing
- The categories of personal data concerned
- Who the data has been, or will be, shared with
- How long the data will be stored for, or if this isn't possible, the criteria used to determine this period



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- Where relevant, the existence of the right to request rectification, erasure or restriction, or to object to such processing
- The right to lodge a complaint with the ICO or another supervisory authority
- The source of the data, if not the individual
- Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual
- The safeguards provided if the data is being transferred internationally

Subject access requests can be submitted in any form, but we may be able to respond to requests more quickly if they are made in writing and include:

- Name of individual
- Correspondence address
- Contact number and email address
- Details of the information requested

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 DPO, Satswana Ltd, Pembroke House, St Christopher's Place, Farnborough, Hampshire GU14 0NH. Telephone 01252 516898. Email info@satswana.com

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.

The school will make all reasonable endeavours to ensure that there are no personal data breaches. In the unlikely event of a suspected data breach where appropriate, we will report the data breach to the ICO within 72 hours after becoming aware of it.

Such breaches in a school context may include, but are not limited to:

- Loss or theft of data or equipment on which personal information is stored
- Unauthorised access to or use of personal information either by a member of staff or third party
- Loss of data resulting from an equipment or systems (including hardware or software) failure
- Human error, such as accidental deletion or alteration of data
- Unforeseen circumstances, such as a fire or flood
- Deliberate attacks on IT systems, such as hacking, viruses or phishing scams



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- Blagging offences where information is obtained by deceiving the organisation which holds it

Who to contact and where to go for further information

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

Data Protection Officer

Satswana Ltd

Pembroke House

St Christopher's Place

Farnborough

Hampshire

GU14 0NH

Telephone 01252 51689

Email info@satswana.com