

Privacy Notice for Pupils Parents and Carers

2026–27 | Draft for school and DPO review before publication

Document Control

Document title	Privacy Notice for Pupils Parents and Carers
Organisation	Barham Church of England Primary School
Address	Valley Road, Barham, Canterbury, Kent CT4 6NX
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Document owner	Satswana Ltd (outsourced Data Protection Officer) — dpo@satswana.com
Senior Information Risk Owner	Jo Duhig, Headteacher
ICO registration	Z7592934
Approved by	Governing Body 8.10.26

Purpose and status

This notice explains how Barham Church of England Primary School collects and uses personal information about pupils and their parents and carers, including for school-run wraparound care. It is issued under Articles 13 and 14 of the UK GDPR. It should be read alongside our Data Protection and Freedom of Information Policy.

Prepared for the 2026–27 academic year. The approved notice will be published on the school website and is available from the school office.

Review cycle: Annually and whenever a new system or purpose is introduced.

Document owner: Satswana Ltd (outsourced Data Protection Officer) — dpo@satswana.com

Who We Are

Barham Church of England Primary School, Valley Road, Barham, Canterbury, Kent CT4 6NX, is the data controller for the information described in this notice. School contact: office@barham.kent.sch.uk. ICO registration: Z7592934.

Our Data Protection Officer is Satswana Ltd (outsourced Data Protection Officer), who can be contacted at dpo@satswana.com or by post marked "For the attention of the Data Protection Officer" at the school address. You may also contact the school office in person or at office@barham.kent.sch.uk.

The Information We Hold About Pupils

- Personal identifiers and contacts — name, former names, unique pupil number, date of birth, address, photographs, and the names, addresses, telephone numbers, email addresses and relationship of parents, carers and emergency contacts.
- Characteristics — ethnicity, first language, free school meal eligibility, pupil premium eligibility, service child status and looked-after status, where relevant to education, support or statutory reporting.
- Attendance — sessions attended, absences, lateness and the reasons given.
- Assessment and attainment — internal assessments, national curriculum assessments and results, reading assessments and progress information.
- Special educational needs and disability — needs, provision, EHC plans, external professional reports and annual review records.
- Medical and health — allergies, conditions, medication, care plans, immunisations, accidents, first aid given and school nursing information.
- Behaviour and exclusions — incidents, sanctions, rewards, suspensions and permanent exclusions.
- Safeguarding and welfare — child protection and child in need records, early help records, referrals to and from social care and other agencies.
- Access and use of school systems — logins, filtering and monitoring records, printing and network usage, and use of approved educational software.
- Site security — CCTV images and visitor and signing-in records. Five fixed, overt external cameras cover the front door, external classrooms/balcony, side gate and path, play area/pre-school path and playground. They support controlled access, safeguarding and site security, and investigation of specific serious incidents. They are not used for routine pupil-behaviour, play or staff-performance monitoring. Audio recording, facial recognition and biometric matching are not part of the approved system.
- Payments and catering — trip, lunch and school-run club payments, balances, bookings and relevant dietary information. The school does not currently use an automated biometric recognition system.

CCTV recordings are stored securely in the server room, with access restricted to named, trained and authorised users. We use public task as the primary lawful basis for CCTV. Relevant footage may be shared where lawful and necessary with the police, courts, safeguarding partners, insurers, legal advisers or appointed investigators. The independent pre-school has no routine access to the system or footage. The full CCTV policy is available from the school office.

Where We Obtain Information

We collect information from pupils, parents and carers and create records through teaching, assessment, attendance, pastoral care and school administration. We may also receive information from previous schools, Kent County Council, health professionals, social care and other agencies supporting or safeguarding a child.

Why We Use It and Our Lawful Basis

We use pupil and parent information to provide education and pastoral care; to monitor and report on progress; to keep children safe; to meet our statutory duties; to communicate with parents and carers; to manage

admissions, attendance and behaviour; to organise catering, trips and school-run wraparound care; to secure our site and systems; and to plan and improve our provision.

Our lawful bases under Article 6 UK GDPR are:

- Public task — most of our processing, being necessary for our task of providing education and looking after pupils.
- Legal obligation — for statutory returns such as the school census, attendance and registration requirements, and safeguarding duties. Relevant legislation includes the Education Act 1996, the Education (Information About Individual Pupils) (England) Regulations 2013, the School Attendance (Pupil Registration) (England) Regulations 2024 and the Children Acts 1989 and 2004. We have regard to Keeping Children Safe in Education.
- Contract — where processing is necessary to provide a service contracted with a parent or carer, such as school-run wraparound care. We use an appropriate separate lawful basis for a child's information where the child is not a party to that contract.
- Vital interests — in a medical emergency or where a child is at immediate risk.
- Consent — for optional uses where we offer a genuine choice, such as identifiable photographs used for publicity. You can withdraw consent at any time by contacting the school office or DPO. This will not affect your child's education or the lawfulness of processing before withdrawal.

Where we handle special category data, such as health or ethnicity information, we also identify an appropriate Article 9 condition and any associated Schedule 1 condition under the Data Protection Act 2018. Depending on the purpose, this may include substantial public interest and safeguarding, health or social care where its requirements are met, vital interests where the person cannot consent, or explicit consent where appropriate. Sensitive information or use of an app does not automatically require parental consent. We document the conditions and safeguards for each use. The UK GDPR and Data Protection Act 2018 apply as amended by the Data (Use and Access) Act 2025.

Who We Share Pupil Information With

We do not sell pupil information and we do not share it more widely than we need to. We share information with:

- the Department for Education, including through the school census and the national pupil database;
- Kent County Council, for admissions, attendance, SEND, safeguarding, transport and statutory returns;
- Ofsted and, where applicable, our diocese or trust;
- assessment and moderation bodies where necessary for statutory primary-school assessments;
- the school nursing service, NHS, child and adolescent mental health services and other health professionals;
- children's social care, the police and other safeguarding partners, where necessary to protect a child;
- the pupil's next school or education provider on transfer;
- our software suppliers, who act as our processors under written contracts — including our management information system, safeguarding recording system, cashless payments, learning platforms and email;
- our auditors, insurers and legal advisers where necessary.

We only share what is necessary in each case, and we record what we have shared and why.

The National Pupil Database

Information we provide to the Department for Education may be held in the National Pupil Database, which the DfE uses for research, statistics and policy. The DfE decides who else may access it under controlled arrangements. Further information: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>. To contact the DfE: <https://www.gov.uk/contact-dfe>.

How Long We Keep It

We keep information only for as long as necessary for its purpose, legal requirements or a justified safeguarding or legal need. Our detailed retention schedule is available from the school office or DPO. The following summary reflects current DfE records-management guidance and should be read with that schedule:

- Main primary pupil record — retained while the pupil attends and transferred securely to the next school when the pupil leaves. Core management information system data is normally retained for two terms after leaving for census and transfer purposes. Statutory registers and other records with separate retention requirements are not deleted under this general rule.
- Child protection records — transferred separately and securely to the next school, with confirmation of receipt and evidence of transfer retained. The retention endpoint is the child's 25th birthday; files relating to child sexual abuse are retained until the child's 75th birthday. Any legal hold, inquiry or investigation may require longer retention.
- Admission and attendance register entries — retained for six years from the date of the relevant entry, in accordance with the School Attendance (Pupil Registration) (England) Regulations 2024.
- Accident and incident records involving pupils — relevant information is retained in the pupil record. Other accident records and records required for claims or investigations follow the applicable period in the school's retention schedule.
- Admissions applications, appeals, SEND and other support records — retained or transferred according to the record's content, applicable requirements and the school's retention schedule. There is no single seven-year retention period for all these records.
- CCTV footage — routine footage is retained for 14 days and then automatically overwritten, unless isolated and preserved for a specific safeguarding, security, legal, insurance, disciplinary or criminal investigation. Preserved footage has a recorded reason, owner, review date and deletion date and is deleted when no longer necessary. Backups must not extend the routine retention period.
- Photographs and consent records — images are kept only while needed for the stated purpose. Consent records are kept for as long as needed to demonstrate the permission relied upon and manage any withdrawal or related complaint, in line with the retention schedule.

At the end of the retention period records are securely destroyed and the destruction is recorded.

Automated Decisions and Profiling

We will not make a legally or similarly significant decision about a pupil solely by automated processing without a lawful basis, appropriate safeguards and specific privacy information. Where software flags attendance, behaviour or progress patterns, staff must review the information before making a decision. Proposed high-risk uses of monitoring, profiling or artificial intelligence require a Data Protection Impact Assessment and DPO advice before use. Information about approved educational technology can be requested from the school office.

Providing Information Is Sometimes Optional

We will explain at the point of collection whether information is required by law, necessary for a service, or optional. You may choose not to provide optional information or consent to optional uses. Where required information is missing, we will explain the practical consequences, such as being unable to complete a booking or needing further information to plan safe support. Refusing optional publicity consent will not affect access to education.

Your Rights Over Your Information

Depending on the circumstances, you may request access to personal information; ask for inaccurate information to be corrected; request erasure, restriction or data portability where the relevant conditions apply; and withdraw

consent where we rely on it. These rights belong to the individual, including the child where the information is about them.

Your right to object

You may object to processing based on public task on grounds relating to your particular situation. Contact the school office or DPO to explain your objection. We will consider it and explain whether we can stop the processing or have compelling lawful grounds to continue.

To exercise a right, contact Satswana Ltd at dpo@satswana.com, the school office at office@barham.kent.sch.uk, or the Headteacher at Valley Road, Barham, Canterbury, Kent CT4 6NX. Requests may be verbal or written and may be made to any member of staff; no special form is required. We normally respond within one calendar month. School holidays do not by themselves pause or extend the deadline. Where a lawful extension or pause applies, we will explain it; an extension for complexity or multiple requests may be up to two further months, with notice within the initial month.

Some rights are qualified. For example, we cannot delete information that we must lawfully retain. We assess exemptions individually, including risks of serious harm and the rights of other people. Information identifying another person is not automatically withheld: we consider consent, whether disclosure without consent is reasonable and any applicable exemption.

If you are unhappy with how we have handled your information, please tell us first so we can put it right. You also have the right to complain to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow SK9 5AF, ico.org.uk/make-a-complaint, 0303 123 1113.

Storing Your Data Outside the UK

If a supplier stores or accesses personal data outside the UK, we will ensure that a lawful transfer mechanism and appropriate safeguards are in place. These may include UK adequacy regulations or approved contractual safeguards, supported by any required data protection assessment. Contact dpo@satswana.com for information about the countries involved and how to obtain details of the safeguards applying to the service concerned.

Pupils Making Their Own Requests

Children have their own data protection rights. There is no fixed minimum age for making a request: we consider each child's understanding and maturity individually. A parent may act where authorised by the child or where the child lacks sufficient understanding, taking account of the child's views, best interests, confidentiality and safeguarding circumstances.

Parents also have a separate legal right to see their child's official educational record under the Education (Pupil Information) (England) Regulations 2005, which we will provide within 15 school days of a written request.

Document Control

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Date of approval: [complete following approval]

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Data Protection Officer: Satswana Ltd (outsourced Data Protection Officer) — dpo@satswana.com

ICO registration: Z7592934

Adapted from the Satswana pupil privacy notice template for Barham Church of England Primary School. CCTV information is aligned with the school's CCTV and Video Surveillance Policy 2026. Read alongside the school's Data Protection and Freedom of Information Policy and retention schedule.