



# Privacy Notice

## For Pupils, Parents/Carers, Visitors and Staff

Kingsbridge Educational Trust and its schools collect and process information relating to pupils, parents/carers, staff and visitors. This notice sets out how information is collected, why it is collected, who it's shared with and how we keep it safe.

Kingsbridge Educational Trust is the organisation that is in charge of personal information. This means the Academy Trust is the Data Controller.

The postal address of Kingsbridge Educational Trust is c/o Oakgrove School, Venturer Gate, Middleton, Milton Keynes MK10 9JQ.

To discuss anything in this privacy notice, please contact the Kingsbridge Educational Trust's Data Controller by email: [data.controller@ket.education](mailto:data.controller@ket.education) or telephone: 01908 533710. Alternatively, contact the Data Protection Officer [nicola@schoolsdp.com](mailto:nicola@schoolsdp.com).

## Pupils

The categories of pupil information that we process (including, but not limited 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 doctor's 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)

### Why we collect and use pupil information

The personal data collected is essential for the school to fulfil their official functions and meet legal requirements.

We collect and use pupil information for the following purposes:

- a) To support pupil learning
- b) To monitor and report on pupil attainment progress
- c) To provide appropriate pastoral care
- d) To assess the quality of our services
- e) To keep children safe
- f) To meet the statutory duties placed upon us by the Department for Education

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

- For the purposes of a), b), c) & e) in accordance with the legal basis of Public task: collecting the data is necessary to perform tasks that schools are required to perform as part of their statutory function
- For the purposes of d) in accordance with the legal basis of legitimate interests: to assess the quality of our services
- For the purposes of f) in accordance with the legal basis of Legal obligation: data collected for DfE census information:
  - Section 537A of the Education Act 1996
  - The Education Act 1996 s29(3)
  - The Education (School Performance Information) (England) Regulations 2007
  - Regulations 5 and 8 School Information (England) Regulations 2008 o the Education (Pupil Registration) (England) (Amendment) Regulations 2013

In addition, some personal information requires extra protection, as it is considered more sensitive. This includes race, ethnicity, religious beliefs, medical conditions, genetic information and biometric data and criminal convictions.

If we are processing special category data, our lawful bases will also include one of the following:

- We have explicit consent
- To meet the statutory duties placed upon us by the Department for Education
- To keep children safe

### **Collecting pupil information**

We obtain pupil information via registration forms when they first join the school. In addition, when a child transfers from another school, we are sent a secure file containing relevant information.

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 and we will tell you what you need to do if you do not want to share this information with us.

### **Storing pupil data**

We hold pupil data securely for the set amount of time shown in our data Retention Policy. For more information on our data retention schedule and how we keep your data safe, please view the [Retentions Policy](#)

### **Who we share pupil information with (including, but not limited to):**

- Schools
- Local authorities
- Youth support services (pupils aged 13+)
- The Department for Education (DfE)
- School nurse, NHS
- School governors/directors
- Companies providing services to the schools, e.g. catering, photography, communion services
- The Police and law enforcements agencies, where appropriate
- Courts, if ordered to do so
- First names of pupils only to other parents to enable Christmas cards to be sent

### **Why we regularly share pupil information**

The information disclosed to these people/services may include sensitive personal information about you. Usually this means information about your health and any special educational needs or disabilities which you have. We do this because these people need the information so that they can support you.

### **Our disclosure of your personal data is lawful for the following reasons:**

- The Academy Trust is under a legal obligation to disclose the information or disclosing the information is necessary for us to meet legal requirements imposed upon us such as our duty to look after our pupils and protect them from harm
- It is necessary for us to disclose your information for the purposes of our functions in providing schooling. This is a function which is in the public interest

- We have a legitimate interest in disclosing your information because it is necessary in order to provide our pupils with education, pastoral care and connected purposes as outlined above
- We will not usually need consent to disclose your information. However, if at any time it appears to us that we would need consent, then this will be sought before a disclosure is made

It is in your interest for personal information to be passed to these people or services. We will ask you for consent to ensure you can understand what we are asking. This is because the law requires us to ask you if you understand. Normally, we involve your parents too. By law we won't need their consent if you can give it, but parents like to be involved because it is part of looking after you. Before you are old enough to understand, we will ask your parents to consent for you.

We do not normally transfer your information to a different country which is outside the UK. This would only happen if one of your parents' lives abroad or if you move to a new school abroad. If this happens, we will be very careful to make sure that it is safe to transfer your information. We will look at whether the other country has good data protection laws for example. If we cannot be sure that it is safe, then we will talk to you and your parents about it and make sure that you are happy for us to send your information. As this is not something we normally do, and we don't know which country we might need to send your information to, we cannot tell you more about it in this document. However, if we want to transfer your data to a different country, then we will tell you whether or not we think it is safe and why we have decided that.

### **How long we keep your information**

We only keep your information for as long as we need to, or for as long as the law requires us to. Most of the information we have about you will be in our pupil file. We usually keep these until your 25th birthday unless you move to another school, in which case we send your file to your new school.

Further information can be found in the [Trust's Retentions policy](#)

### **Youth support services - Pupils aged 13+**

Once our pupils reach the age of 13, we also pass pupil information to our local authority and/or provider of youth support services, as they have responsibilities in relation to the education or training of 13-19-year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- Youth support services
- Careers advisers

A parent or guardian can object to any information in addition to their child's name, address and date of birth being passed to their local authority or provider of youth support services by informing us in writing. This right is transferred to the child/pupil once they reach the age 16.

Data is securely transferred to the youth support service via a secure file transferring system and is stored within local authority software.

## **Pupils aged 16+**

We will also share certain information about pupils aged 16+ with our local authority and/or provider of youth support services, as they have responsibilities in relation to the education or training of 13-19-year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- Post-16 education and training providers
- Youth support services
- Careers advisers

A child/pupil, once they reach the age of 16, can object to any information in addition to their name, address and date of birth being passed to their local authority or provider of youth support services by informing us in writing.

Data is securely transferred to the youth support service via a secure file transferring system and is stored within the local authority software.

For more information about services for young people, please visit our [local authority website](#)

## **Department for Education**

We are required to share information about our pupils with the Department for Education (DfE), either directly or via our local authority for the purpose of data collections, under:

- Section 537A of the Education Act 1996
- The Education Act 1996 s29(3)
- The Education (School Performance Information) (England) Regulations 2007
- Regulations 5 and 8 School Information (England) Regulations 2008
- The Education (Pupil Registration) (England) (Amendment) Regulations 2013

All data is transferred securely and held by DfE under a combination of software and hardware controls, which meet the current government security policy framework.

For more information, please see the 'How Government uses your data' section.

## **Local Authorities**

We may be required to share information about our pupils with the local authority to ensure that they can conduct their statutory duties under the [Schools Admission Code](#), including conducting Fair Access Panels.

## **Requesting access to your personal data**

Under GDPR, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact: [data.controller@ket.education](mailto:data.controller@ket.education)

Depending on the lawful basis above, you may also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Prevent processing for the purpose of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed
- A right to seek redress, either through the ICO, or through the courts

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the [Information Commissioner's Office](#)

For further information on how to request access to personal information held centrally by DfE, please see the 'How Government uses your data' section of this notice.

### **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 [data.controller@ket.education](mailto:data.controller@ket.education)

### **Last updated**

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated in December 2022.

### **Contact**

If you would like to discuss anything in this privacy notice, please contact:

- Data Controller, Kingsbridge Educational Trust [data.controller@ket.education](mailto:data.controller@ket.education)
- Nicola Cook, Data Protection Officer [nicola@schoolsdp0.com](mailto:nicola@schoolsdp0.com)

### **How the Government uses your data**

The pupil data that we lawfully share with the 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 (for example, school GCSE results or Pupil Progress measures)
- Supports 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

### **Data collection requirements**

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) visit their [website](#)

## **The National Pupil Database (NPD)**

Most pupil data in England goes on to be held in the National Pupil Database (NPD).

The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the department.

It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

Find out more by visiting the [National Pupil Database](#)

## **Sharing by the Department for Education**

The law allows the Department to share pupils' personal data with certain third parties, including:

- Schools
- 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

View the Department's [NPD data sharing process](#)

Organisations fighting or identifying crime may use their legal powers to contact DfE to request access to individual level information relevant to detecting that crime. Whilst numbers fluctuate slightly over time, DfE typically supplies data on around 600 pupils per year to the Home Office and roughly 1 per year to the Police.

For information about which organisations the Department has provided pupil information, (and for which project), or to access a monthly breakdown of data share volumes with Home Office and the Police, please visit their [website](#)

## **How to find out what personal information DfE hold about you**

Under the terms of the Data Protection Act 2018, you are entitled to ask the Department:

- 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, you should make a 'subject access request'. Further information on how to do this can be found within the [Department's personal information charter](#)

Contact the [DfE](#)

---

## **Parents/Carers**

### **Why do we collect and use parent information?**

We are required by law to provide education. The main pieces of legislation that govern this are:

- The Education Act (various years)
- The Education (Pupil Registration) (England) Regulations
- The School Standards and Framework Act 1998
- The School Admissions Regulations 2012
- Children and Families Act 2014
- The Special Educational Needs and Disability Regulations 2014

Whilst providing education, we are tasked with the welfare of the children within our care. Part of this is ensuring that we have appropriate contact information for the adults with responsibility for those children.

### **What do we need this data for?**

We use parent information to let you know if there is anything that you need to be aware of in relation to your child's education. We also use your information to contact you about parent evenings or other events held by the school where your child's education may be discussed with you.

Your contact details are also kept on record in case we need to speak to you in an emergency situation.

### **What type of data do we collect and use?**

Generally, we will collect personal data such as your name, address, telephone numbers and whether you have parental responsibility.

We may also ask whether you are in receipt of certain benefits so that you can apply for pupil premium funding for your child or for free school meals.

### **How do we ensure that we are using this information legally?**

We collect and use parents' information under GDPR article 6 under the following legal bases;

- We have a legal obligation to do so
- The information is necessary in the performance of our public task
- The processing is necessary to protect the vital interest of the child
- For some categories, we will ask for your consent
- For some categories, outside of our core obligations of providing education, we process data on the basis that we have a legitimate interest to do so

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you when we require your consent for the information for which we are asking.



## **How long do we keep your data for?**

The length of time that we retain information for is set out within our Retentions Policy. Generally speaking, we will retain parental information for the length of time that your child is enrolled at our school unless we are required by law to retain it for longer.

## **Who do we share your information with?**

Parent information is rarely shared but, in certain circumstances, we may share your data with;

- The police
- Insurers, in relation to insurance claims
- HSE or external organisations, where accident reporting or investigation is required
- Other third parties in event of a safeguarding incident

## **Your rights under GDPR**

Under data protection legislation, parents have the right to request access to information about them that we hold. To make a request for your personal information contact Jane Lear, Data Controller, via [data.controller@ket.education](mailto:data.controller@ket.education)

You also have the right to:

- Prevent processing for the purpose of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed

## **How to raise a complaint**

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance by contacting [data.controller@ket.education](mailto:data.controller@ket.education)

You can also complain directly to the [Information Commissioner's Office](#)

---

## **Visitors**

### **Why do we collect and use visitor information?**

We collect and use information on visitors to ensure that we run a safe and effective school and to fulfil our legal duty to safeguard the children in our care and the staff in our employ.

### **What do we need this data for?**

We collect and use visitor data to;

- Safeguard pupils
- Meet the requirements of Health and Safety Legislation
- Meet the requirements of Fire Safety Legislation
- Ensure that we keep a safe and secure site
- Ensure that events and meetings are appropriately organised

## **What type of data do we collect and use?**

We collect and use:

- Personal information, such as name and photograph
- CCTV images

## **How do we ensure that we are using this information legally?**

We have a legal obligation under safeguarding legislation, to ensure that our site is safe and secure.

We also have a legal obligation under fire safety law, to ensure that we can account for the people in our buildings. This includes visitors. Under article 6 of the GDPR, Legal Obligation is a valid reason for collecting and processing personal data.

## **How long do we keep your data for?**

We keep visitor data for 6 years plus the current year, in line with our [Retentions Policy](#)

Visitor data may be stored on:

- Electronic visitor management systems, such as inventory
- Signing in books
- Fire registers
- CCTV systems
- Visitor badges
- Office 365
- Room booking software or systems

## **Who do we share your information with?**

Visitor information is rarely shared but, in certain circumstances, we may share your data with:

- The police
- Insurers, in relation to insurance claims
- HSE or external organisations, where accident reporting or investigation is required
- Other third parties in the event of a safeguarding incident

## **Why do we share your information?**

We only share your information without your consent where the law or our policies allow us to do so.

## **Your rights under GDPR**

Under data protection legislation, visitors have the right to request access to information about them that we hold. To make a request for your personal information contact Jane Lear, Data Controller, via [data.controller@ket.education](mailto:data.controller@ket.education).

You also have the right to:

- Prevent processing for the purpose of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed

## How to raise a complaint

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance by contacting [data.controller@ket.education](mailto:data.controller@ket.education)

You can also complain directly to the [Information Commissioner's Office](#)

---

## Staff

### Why do we collect and use staff information?

As an employer, we are required to collect and process certain information relating to the people that work for us.

Some of this is collected in line with our obligations under employment law, some is collected in order to comply with safeguarding legislation and some is provided to allow us to ensure that you are paid and that your pension contributions are collected.

### What do we need this data for?

We use Trust workforce data to:

- Enable the development of a comprehensive picture of the workforce and how it is deployed
- Inform the development of recruitment and retention policies
- Enable individuals to be paid
- Administer wellbeing benefits to our employees
- Fulfil our obligations with regard to safeguarding of the children in our care
- Fulfil our obligations with regard to the wellbeing and welfare of our employees, including the need for contacts in case of emergency

### What type of data do we collect and use?

The categories of school workforce information that we collect, process, hold and share include:

- Personal information (such as name, employee or teacher number, national insurance number)
- Payroll data (such as tax, national insurance payments, pension information)
- Special categories of data, including characteristics information such as gender, age, ethnic group
- Contract information (such as start dates, hours worked, post, roles and salary information)
- Work absence information (such as number of absences and reasons)
- qualifications (and, where relevant, subjects taught)
- DBS data
- Performance management data
- Interview details for all applicants, whether successful or not

### **How do we ensure that we are using this information legally?**

We process this information on the grounds that 'processing is necessary for the performance of a contract to which the data subject is party' (GDPR Article 6).

Data that is classified as 'special category' is only collected where the data subject has given explicit consent and where the reason for collecting and processing the data has been explained to them. A data subject can withdraw consent at any time and, if they do so, the data covered by the consent must be securely disposed of or deleted from the record, unless the data subject has requested that the information is retained but no longer processed.

### **How long do we keep your data for?**

We keep records in line with the provisions set out in our [Retentions Policy](#) and the legal requirements of employment law and the Limitation Act.

### **Who do we share your information with?**

We routinely share this information with:

- Our local authority (Milton Keynes City Council)
- Department for Education (DfE)
- Our payroll and HR provider (EduPay)
- Pension providers (TPS and LGPS)
- HMRC
- The Office for National Statistics (although this data is generally anonymised)
- Child Care Voucher Companies
- Cycle to Work Scheme Companies

### **Why do we share your information?**

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

#### **Local authority**

We are required to share information about our workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

#### **Department for Education (DfE)**

We share personal data with the Department for Education (DfE) on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding/expenditure and the assessment educational attainment.

#### **Our Payroll and HR Provider**

We share information with our payroll and HR provider in order to administer contracts between ourselves and our employees and to enable our employees to be paid.

## **Pension Providers**

We share information with support staff pension service and teachers' pension service providers in order for them to administer the pension schemes set up for our employees.

## **HMRC**

Information is shared with HMRC to ensure that the correct taxes and national insurance payments are collected.

## **ONS**

Statistical data shared is anonymised. Data is not attributable to any specific individuals.

## **Child Care Voucher Companies**

We share data with Child Care Voucher Companies to allow them to administer a benefits platform for our employees. This is shared and is limited to employee name and email address. Any further information that is provided to Child Care Voucher Companies directly becomes their responsibility, as they then become the data controller.

## **Cycle to Work Scheme Companies**

Data is shared with Cycle to Work companies to allow them to administer a benefits platform for our employees. This is shared and is limited to employee name and email address. Any further information that is provided to Cycle to Work Scheme Companies directly becomes their responsibility, as they then become the data controller.

## **Data collection requirements**

The DfE collects and processes personal data relating to those employed by schools (including Multi Academy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies, free schools and all special schools, including Pupil Referral Units and Alternative Provision). All state funded schools are required to make a census submission, as it is a statutory return under sections 113 and 114 of the Education Act 2005.

To find out more about the data collection requirements placed on us by the Department for Education, including the data that we share with them, visit [Data collection and censuses for schools](#)

The Department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- Conducting research or analysis
- Producing statistics
- Providing information, advice or guidance

The Department for Education has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal 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
- The arrangements in place to securely store and handle the data

To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit [How DfE share personal data](#)

To contact the [Department of Education](#)

### **Your rights under GDPR**

Under data protection legislation, staff have the right to request access to information about them that we hold. To make a request for your personal information contact Jane Lear, Data Controller, via [data.controller@ket.education](mailto:data.controller@ket.education).

You also have the right to:

- Prevent processing for the purpose of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed

### **How to complain**

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance by contacting [data.controller@ket.education](mailto:data.controller@ket.education).

You can also complain directly to the [Information Commissioner's Office](#).