

## Privacy Notice - Pupils, Parents and Carers

The Howard Academy Trust collects data and information about parents / carers and pupils so that we can operate effectively as a Trust. This privacy notice explains how and why we collect parent / carer and pupil data, what we do with it and what rights parents have.

The Howard Academy Trust (“THAT”), a multi academy trust and is a charitable company limited by guarantee (registration number 09175427) whose registered office is at South Side Three Road, Chatham, Kent, ME4 4FQ. The Trust is the Data Controller for all the academies/schools within the Trust. Schools within the Trust include:

- Deanwood Primary School - Long Catlis Road Parkwood Gillingham Kent ME8 9TX
- Miers Court Primary School - Silverspot Close Rainham Kent ME8 8JR
- Hurstmere School - Hurst Road Sidcup Kent DA15 9AW
- Temple Mill Primary School - Cliffe Road Strood Rochester Kent ME2 3NL
- Thames View Primary School - Bloors Lane Rainham Gillingham Kent ME8 7DX
- The Abbey School - London Road Faversham Kent ME13 8RZ
- The Howard School - Derwent Way Rainham Gillingham Kent ME8 0BX
- The Rowans Silverbank Churchill Avenue Chatham Kent ME5 0LB
- Waterfront UTC - South Side Three Road Chatham Kent ME4 4FQ

The Data Protection Officer for The Howard Academy Trust can be contacted at [dpo@thatrust.org.uk](mailto:dpo@thatrust.org.uk). The Data protection Officer for the Trust is:

School Pro TLC Limited  
Unit 1b Aerotech Business Park,  
Bamfurlong Lane,  
Cheltenham, GL51 6TU  
Telephone: 0145220947633  
Email: [dpo@schoolpro.uk](mailto:dpo@schoolpro.uk)

The term “parent” is widely defined in education law to include the natural or adoptive parents (regardless of whether parents are or were married, whether a father is named on a birth certificate or has parental responsibility for the pupil, with whom the pupil lives or whether the pupil has contact with that parent), and also includes non-parents who have parental responsibility for the pupil, or with whom the pupil lives. It is therefore possible for a pupil to have several “parents” for the purposes of education law. This privacy notice also covers other members of pupils’ families who we may process data about from time to time, including, for example, siblings, aunts and uncles and grandparents.

### 1. Data Protection Principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- a) Used lawfully, fairly and in a transparent way.
- b) Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- c) Relevant to the purposes we have told you about and limited only to those purposes.
- d) Accurate and kept up to date.
- e) Kept only as long as necessary for the purposes we have told you about.
- f) Kept securely.

### 2. The Type of Information we hold

Personal data, or personal information, means information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymised data).

We collect and use information under the following lawful bases:

- a. Where we have the consent of the data subject (Article 6 (a));
- b. Where it is necessary for compliance with a legal obligation (Article 6 (c));
- c. Where processing is necessary to protect the vital interests of the data subject or another person (Article 6(d));
- d. Where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Article 6 (e)).

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Where the personal data we collect about parents / carers is sensitive personal data, we will only process it where:

- a) we have explicit consent;
- b) Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent; and / or
- c) Processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, where we respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Please see the Trust Data Protection Policy for a definition of sensitive personal data.

We use the parent / carer data to support our functions of running the Trust, in particular:

- a. to support schools with their admission processes;
- b. to support schools to maintain a waiting list;
- c. to support school's pupil learning;
- d. to support schools, monitor and report on pupil progress;
- e. to support schools to provide appropriate pastoral care;
- f. to support the bursary process
- g. to assess the quality of our services;
- h. to comply with the law regarding data sharing;
- i. for the protection and welfare of pupils and others in the school, including our safeguarding / child protection obligations;
- j. for the safe and orderly running of the Trust;
- k. to promote the Trust and schools;
- l. to send you communications that may be of interest to you which may include information about Trust and school events or activities, news, campaigns, appeals, other fundraising activities;
- m. in order to respond to investigations from our regulators or to respond to complaints raised by our stakeholders;
- n. in connection with any legal proceedings threatened or commenced against the Howard Academy Trust or a school within the Trust.

### 3. The Categories of Parent/Carer and Pupil information

The categories of parent/carers and pupil information that we collect, hold and share include:

- a. Personal information (such as name, address, telephone number and email address);
- b. Information relating to your identity, marital status, employment status, religion, ethnicity, language, medical conditions, nationality, country of birth, identification documents, and free school meal / pupil premium eligibility / entitlement to certain benefits, information about court orders in place affecting parenting arrangements for pupils);
- c. We also collect, use, store and share (when appropriate) pupil data which includes but is not restricted to:
  - personal identifiers and contacts (such as name, unique pupil number, contact details and address)
  - personal identifiers and Contact details, contact preferences,
  - date of birth, identification documents
  - Results of internal assessments and externally set tests
  - Pupil and curricular records
  - Characteristics, such as ethnic background, eligibility for free school meals or special educational needs (including the needs and ranking);
  - behavioural information (such as exclusions and any relevant alternative provision put in place)
  - Details of any medical conditions, including physical and mental health
  - Attendance information
  - Safeguarding information (such as court orders and professional involvement)
  - medical and administration (such as doctors' information, child health, dental health, allergies, medication and dietary requirements)

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- Details of any support received, including care packages, plans and support providers
- 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)
- Photographs
- CCTV images captured at Howard Academy Trust school sites.

This list is not exhaustive, for more information or a list of categories of information we process please contact [dpo@thatrust.org.uk](mailto:dpo@thatrust.org.uk).

- d. From time to time and in certain circumstances, we might also process personal data about parents / carers, some of which might be sensitive personal data, information about criminal proceedings / convictions or information about child protection / safeguarding. This information is not routinely collected about parents / carers and is only likely to be processed by the Howard Academy Trust in specific circumstances relating to particular pupils, for example, if a child protection issue arises or if a parent / carer is involved in a criminal matter. Where appropriate, such information may be shared with external agencies such as the child protection team at the Local Authority, the Local Authority Designated Officer and / or the Police. Such information will only be processed to the extent that it is lawful to do so, and appropriate measures will be taken to keep the data secure.

We collect information about parents / carers before pupils join a school in the Howard Academy Trust and update it during pupils' time on the roll as and when new information is acquired.

## A. Collecting parent / carer and pupil information

We collect parents / carers and pupil information via admission forms at the start of the school year or Common Transfer File (CTF) or secure file transfer from the previous setting

Whilst the majority of information about parents / carers and pupils provided 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 whether you are required to provide certain parent / carer information to us or if you have a choice in this. Where appropriate, we will ask parents / carers for consent to process personal data where there is no other lawful basis for processing it, for example where we wish to ask your permission to use your information for marketing purposes or to request voluntary contributions. Parents / carers may withdraw consent given in these circumstances at any time. In addition, The Howard Academy Trust also uses CCTV cameras around school sites for security purposes and for the protection of staff and pupils. CCTV footage may be referred to during the course of disciplinary procedures (for staff or pupils) or to investigate other issues. CCTV footage involving parents / carers will only be processed to the extent that it is lawful to do so. Please see our CCTV policy for more details.

## B. Storing parent / carer and pupil data

A significant amount of personal data is stored electronically, for example, on our database, Arbor. Some information may also be stored in hard copy format. From time to time, data stored electronically may be saved on a cloud-based system which may be hosted in a different country. Personal data may be transferred to other countries if, for example, a school is arranging a trip to a different country. Appropriate steps will be taken to keep the data secure; you can contact the DPO for more information on trips overseas and how data is kept secure. We will only retain personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, insurance or reporting requirements.

All confidential information is kept secure either on encrypted, password protected devices or paper copies kept on the school site. Once the deadline for retaining information has passed, data kept electronically is deleted and paper copies are destroyed in conjunction with the retention schedule.

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Details of retention periods for different aspects of your personal information are available in the Trust Records Management Policy which is available on School websites and on the Trust website ([thatrust.org.uk](http://thatrust.org.uk)). To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a parent / carer of a child at a school within the Trust we will retain and securely destroy your personal information in accordance with the Trust Records Management Policy.

## 4. Data Sharing

We routinely share parent / carer and pupil information with:

- Academies/schools or other educational institutes that pupils attend after leaving us;

From time to time, we may also share parent / carer information other third parties including the following (this list is not exhaustive):

- school governors / trustees;
- our local authority and or a pupil's home local authority (if different);
- Schools that pupil attends after leaving us;
- the Department for Education (DfE);
- the Police and law enforcement agencies;
- External professionals who visit school (such as a school nurse, educational psychologists);
- Suppliers and service providers with whom we have a contract
- Voluntary organisations linked to the school
- Education Welfare Officers;
- Courts, if ordered to do so;
- the Teaching Regulation Authority;
- Prevent teams in accordance with the Prevent Duty on academies;
- other academies, for example, if we are negotiating a managed move and we have your consent to share information in these circumstances;
- our legal advisors;
- our insurance providers / the Risk Protection Arrangement;

## Why We Regularly Share Pupil Information

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

## 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

The information shared is limited to the child's name, address and date of birth. However where a parent or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the child / pupil once they reach the age 16.

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## 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

For more information about services for young people, please contact the school or visit the local authority website.

## Learning Records Service

Students aged 14+:

For students enrolling for post 14 qualifications, the Learning Records Service will give us a student's unique learner number (ULN) and may also give us details about the student's learning or qualifications.

## Department for Education (DfE)

The pupil data that we lawfully share with the Department for Education (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)

We are required to share information about our pupils and students with the DfE under regulation 5 of The Education (Information about Individual Pupils) (England) Regulations 2013.

To find out more about the data collection requirements placed on us by the Department for Education (DfE) (for example; via the school census) go to [Dept for Education - School Census](#).

## The National Pupil Database (NPD)

Much of the data about pupils in England goes on to be held in the National Pupil Database (NPD).

The NPD is owned and managed by the Department for Education (DfE) 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 for Education (DfE).

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.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-npd-privacy-notice/national-pupil-database-npd-privacy-notice>

## Sharing by the Department for Education (DfE)

DfE will only share pupils' personal data where it is lawful, secure and ethical to do so. Where these conditions are met, the law allows the Department for Education (DfE) to share pupils' personal data with certain third parties, including:

- schools and 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

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For more information about the Department for Education's (DfE) NPD data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

Organisations fighting or identifying crime may use their legal powers to contact the Department for Education (DfE) to request access to individual level information relevant to detecting that crime.

For information about which organisations the Department for Education (DfE) 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 the following website: <https://www.gov.uk/government/publications/dfe-external-data-shares>

## How to find out what personal information the Department for Education (DfE) holds about you

Under the terms of the UK GDPR, you are entitled to ask the Department for Education (DfE):

- 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 for Education (DfE), you should make a 'subject access request'. Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

or

<https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>

## 5. Requesting access to personal data

Under data protection legislation, parents / carers have the right to request access to information about you that we hold ("Subject Access Request"). To make a request for your personal data, please contact the Data Protection Officer ([dpo@thatrust.org.uk](mailto:dpo@thatrust.org.uk)) although any written request for personal data will be treated as a Subject Access Request. The legal timescales for the Howard Academy Trust to respond to a Subject Access Request is one calendar month. As the Trust has limited staff resources outside of term time, we encourage parents / carers to submit Subject Access Requests during term time and to avoid sending a request during periods when the Trust or Schools within the Trust are closed or is about to close for the holidays where possible. This will assist us in responding to your request as promptly as possible. For further information about how we handle Subject Access Requests, please see the Trust Data Protection Policy.

### Requesting access to your child's data

Parents / carers have a legal right to access their child's educational record. Parents / carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually children under the age of 13), or where the child has provided consent.

Depending on the lawful basis used for processing data (as identified above), you may also have the right to:

- have your personal data rectified if it is inaccurate or incomplete;
- request the deletion or removal of personal data where there is no compelling reason for its continued processing;
- restrict our processing of your personal data (i.e. permitting its storage but no further processing);
- object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics; or
- not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.

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If you have a concern or complaint 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 at <https://ico.org.uk/concerns>

## No fee usually required

You will not have to pay a fee to access your child's or your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

## What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it. You 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; and
- claim compensation for damages caused by a breach of our data protection responsibilities.

## 6. Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Headteacher. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the school office or by emailing [dpo@Thatrust.org.uk](mailto:dpo@Thatrust.org.uk)

## 7. Data protection officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO at [dpo@thatrust.org.uk](mailto:dpo@thatrust.org.uk).

You have the right to make a complaint at any time to the Information Commissioner's Office [ICO](https://ico.org.uk), the UK supervisory authority for data protection issues. You can contact the Information Commissioners Office on 0303 123 1113, via email or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

## 8. Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information. This version was last updated in March 2025.

## Contact Us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer School Pro TLC Ltd: **Email:** [dpo@thatrust.org.uk](mailto:dpo@thatrust.org.uk)

**Address:** The Howard Academy Trust South Side Three Road, Chatham, Kent, ME4 4FQ