

Privacy Notice (How We Use Pupil and Parent Information)

This Privacy Notice has been adopted by all schools within The Golden Thread Alliance – Culverstone Green Primary School, Fleetdown Primary Academy, Meopham Community Academy, Oakfield Primary Academy, The Riverview Academy, Temple Hill Primary Academy, West Hill Primary Academy and Wrotham Road Primary School.

This abridged Privacy Notice explains how and why we store personal information about pupils, parents and carers within each of the schools in the Trust. It provides a guide to parents and carers about our legal obligations and their own rights. Like any organisation which handles personal data, our school is defined as a ‘Data Controller’ and, as such, we are registered with the ICO (Information Commissioner’s Office) and we comply with the Data Protection Act and UK General Data Protection Regulation. For the full Privacy Notice, please contact the school/Trust directly.

The Categories of Pupil Information That We Process Include:

For all pupils	Personal Information	Name, Date of Birth, Gender, Year Group, Class, Address, Contacts Dietary needs, dietary preferences Medical practice address and telephone number Medical conditions
	Characteristics	Ethnicity, language, nationality, country of birth
	Attendance Information	Sessions attended, number of absences, reasons for absence
	Academic attainment and progress records	Teacher Assessment grades Statutory assessment results Standardised score results Learning journey evidence (photographs and annotations) Other photographic evidence of learning Reports to parents (mid-year and end of year)
	Other	Pupil Surveys Incidental evidence of pupils’ successes (certificates, photographs, named trophies, celebration events)
For some pupils (only if applicable)	Other	Free School Meals eligibility Court Orders Other pupil premium eligibility (such as if the child is looked after) Safeguarding records (incidents, external agency reports Special Educational needs records (professional assessments, external professionals’ reports, referrals for external support) Pastoral records (referrals for support both internal and external, notes of discussions with pupils, pupils’ jottings of thoughts and feelings) Exclusion information Behaviour incident records
All Parents/Carers*	Personal Information	Names, addresses, telephone numbers, email addresses, relationship to the child (of parents/carers and other given contacts) Free school meals eligibility evidence
	Other	Parents’ surveys Letters sent to school Emails sent to school Financial payments, including debt (both manual and electronic)

*this refers to those with legal responsibility for the child

This list is not exhaustive, to access the current list of categories of information we process please see contact Claire Misy, via Claire.misy@golden-thread.org.

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 many purposes, including the following:

- To support pupil learning
- To keep informed to keep children safe
- To monitor and report on pupil progress
- Safeguarding pupils' welfare and providing appropriate pastoral (and where necessary medical) care
- Informing decisions such as the funding of schools
- Assessing performance and to set targets for schools
- Giving and receive information and references about past, current and prospective pupils, and to provide references to potential employers of past pupils
- Managing internal policy and procedure
- Enabling pupils to take part in assessments, to publish the results of examinations and to record pupil achievements
- To carry out statistical analysis for diversity purposes
- Legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care
- Enabling relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate
- Monitoring use of the school's IT and communications systems in accordance with the Trust's IT security policy
- Making use of photographic images of pupils in school publications, on the school website and on social media channels
- Security purposes, including CCTV
- To comply with the law regarding data sharing
- To meet the statutory duties placed upon us for DfE data collections
- Analyse patterns and trends amongst cohorts of pupils, year to year

We use the parents' data:

- To assess the quality of our services
- To comply with the law regarding data sharing
- To ensure financial stability

Under the UK General Data Protection Regulation (UK GDPR), the legal bases we rely on for processing personal information for general purposes are: (6a) Consent; (6c) A Legal obligation; (6d) A duty to safeguard pupils; (6e) Public task.

Special Categories of data are set out in Article 9 of the UK General Data Protection Regulation. The Golden Thread Alliance will work within the conditions of GDPR – Article 9 of the UK GDPR: (9.2a) explicit consent; (9.2b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law; (9.2c) where processing is necessary to protect the vital interests of the data subject or of another natural person; (9.2f) for the establishment, exercise or defence of legal claims; (9.2g) reasons of substantial public interest; (9.2j) for archiving purposes in the public interest.

We process criminal offence data under Article 10 of the UK GDPR.

Our Data Protection Policy highlights the conditions for processing in Schedule 1 of the Data Protection Act 2018 that we process Special Category and Criminal Offence data under.

How We Collect & Store Pupil Information

We collect pupil information via registration forms at the start of the school year, Common Transfer File (CTF) or secure file transfer or via post from the previous setting. We may also collect data from you directly.

For training and quality purposes, we record both incoming and outgoing calls. This data is retained securely for 30 days.

We hold pupil data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please visit our website to see our Data Protection Policy and Data Retention Policy.

Who We Share Pupil Information With

We routinely share pupil information with the following organisations. Our full Privacy Notice explains the reasons why we share data with these organisations:

- Schools that the pupil attends after leaving us
- Our local authority
- The Department for Education (DfE)
- Standards and Testing Agency (STA)
- Children’s Social Care (when safeguarding pupils’ welfare)
- External professionals who visit school (such as Educational Psychologists and Lawyers)
- Law enforcement officials such as the Police
- The NHS
- Suppliers and service providers with whom we have a contract, including HR Support, insurance, information security and Microsoft
- Voluntary organisations linked to the school
- Other schools within the Trust
- Police CyberAlarm
- Google Workspace for Education
- AI Driven Transcription Tools

How we use AI

Our schools use AI technologies to enhance learning, support administrative processes and analyse anonymized data.

We do not use AI for automated decision-making or profiling without clear oversight and safeguards.

If AI tools process personal data, we will ensure full compliance with UK GDPR, conduct Data Protection Impact Assessments (DPIAs) and obtain consent, where required.

What Data AI Systems May Collect

AI tools used in our schools may collect the following non-identifiable data:

- Usage data (e.g frequency of AI tool interactions)
- Anonymised learning analytics
- General feedback data for improving education tools

However, some third party AI tools may collect additional data, such as:

- IP address, device location, system/browser information
- Text inputs provided by users (which may include personal data if entered manually)

We ensure that all AI vendors used by our schools comply with UK GDPR and that no sensitive data is shared with any AI tools without appropriate safeguards.

Recording of Meetings

To ensure the privacy of our parents, carers and pupils, we do not condone or permit the recording of meetings by third parties. In the rare event that the school or Trust deems it necessary to record a meeting for official and legitimate purposes, we will always seek explicit consent from all participating parties (e.g., parents, carers, colleagues and pupils where appropriate) before any recording commences. Should a meeting be recorded with consent, parents and carers may request a copy of the recording or a summary of the meeting notes. All recordings will be handled, stored and deleted strictly in accordance with the Trust's Data Retention Policy.

Requesting Access to Your Personal Data

The UK-GDPR gives you certain rights about how your information is collected and used. To make a request for your personal information, contact Claire Misy, Chief Operating and Financial Officer, Claire.misy@golden-thread.org.

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.

- the right to ask us for copies of personal information we have about you – this is called ‘right of access’, this is also known as a subject access request, data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called ‘right to rectification’.
- the right to ask us to delete your personal information – this is called ‘right to erasure’
- the right to ask us to stop using your information – this is called ‘right to restriction of processing’.
- the ‘right to object to processing’ of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to complain to the Information Commissioner if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don’t haven’t the right to object, but you have the right to withdraw consent.

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, with our Data Protection Officer which is SchoolPro TLC Ltd via DPO@schoolpro.uk or directly to the Information Commissioner’s Office at <https://ico.org.uk/concerns/>

Alternatively, you can contact our Data Protection Officer which is SchoolPro TLC Ltd via DPO@schoolpro.uk.

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the ‘How Government uses your data’ section of the full privacy 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 Claire Misy, Chief Operating and Financial Officer, Claire.misy@golden-thread.org.

Under Section 164A of the Data Protection Act 2018, you have a statutory right to complain if you believe your personal data has been handled inappropriately.



If you wish to raise a concern about how we process your personal data, please contact Claire Misy, Chief Operating and Financial directly. We will acknowledge your complaint within 30 days of receipt and take appropriate steps to investigate and respond without undue delay.

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 February 2026.

Contact, Full Privacy Notice & How Government Uses Your Data

If you would like to discuss anything in this privacy notice, or to view our full Primary Academy Pupils & Parents Privacy Notice (including how the Government uses your data), please contact: Claire Misy, Chief Operating and Financial Officer, clairemisy@golden-thread.org or access it via the school or Trust's website.