St Saviour's Church of England Junior School

Privacy Notice – How we use pupil information

Last updated: September 2026

St Saviour's Church of England Junior School is committed to protecting the privacy and security of personal information.

This privacy notice explains how we collect, use, store and share personal information about pupils. It also explains the rights that pupils and parents/carers have in relation to personal data.

This notice should be read alongside the school's other relevant policies and procedures.

Why do we collect and use pupil information?

We collect and use pupil information in accordance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**, together with relevant education legislation.

We collect and use pupil information because we are required to do so in order to fulfil our legal and educational responsibilities and, where appropriate, because processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the school.

Depending on the particular information and purpose, we may also rely on other lawful bases available under data protection legislation, including consent and, where appropriate, legitimate interests.

Where we process special category personal data, we will also identify and rely on an appropriate condition under Article 9 of the UK GDPR.

We may use pupil information:

- to support pupil learning;
- to monitor and report on pupil progress;
- to provide appropriate pastoral care;
- to assess the quality of our services;
- to support safeguarding and child protection;
- to comply with our legal and statutory responsibilities;
- to meet our duties in relation to attendance, behaviour, special educational needs and disability, and other areas of school administration;
- to communicate with pupils and parents/carers;
- to organise and administer school activities, trips, events and educational experiences;
- to maintain appropriate records;
- to comply with the law regarding data sharing; and
- to support the effective and safe operation of the school.

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

- **Personal information**, such as name, unique pupil number and address;
- **Characteristics**, such as ethnicity, language, nationality, country of birth and free school meal eligibility;
- **Attendance information**, such as sessions attended, number of absences and absence reasons;

- **Learning, attainment and progress data**, including information relating to Special Educational Needs and Disabilities;
- **Pastoral and safeguarding/child protection information**;
- **Notes on behaviour**, including online safety concerns and incidents and racial or homophobic insults;
- **Photographs and videos**, where these are taken or used for school-related purposes and the pupil can be identified; and
- other information necessary for the school to carry out its legal, educational, safeguarding and administrative responsibilities.

Photographs and videos

Photographs and videos of identifiable pupils are personal data and are therefore handled in accordance with data protection legislation.

Photographs required for school purposes

In some circumstances, the school needs to take or use a photograph to carry out its functions and meet its identification and safeguarding responsibilities. For example, we may require a photograph of a new pupil for our management information system (MIS), so that authorised staff can identify the pupil and support the maintenance of accurate pupil and safeguarding records.

For photographs required for these purposes, the school does not rely on parental consent as the lawful basis for processing. Where appropriate, the school relies on the public task lawful basis. These required photographs are separate from the optional photography and video preferences described below.

If you have concerns about a photograph that the school needs to take or use for these purposes, please contact the school in the first instance. You may also contact our Data Protection Officer, Invicta Law Ltd, at dpo@invicta.law.

We may take photographs and videos of pupils as part of school life, including:

- learning and classroom activities;
- school trips and visits;
- sporting events;
- performances and celebrations;
- pupil achievements;
- class and group photographs;
- school displays;
- school publications and presentations; and
- other activities and events organised or supported by the school.

Depending on the purpose, photographs and videos may be:

- displayed within the school;
- used in school books, displays and presentations;
- used in school promotional materials such as prospectuses, banners and flyers;
- published on the school website;
- published on official school social media accounts; or
- provided to local or regional media organisations where appropriate.

The school will identify an appropriate lawful basis for each particular use of photographs and videos.

Where the school relies on consent as the lawful basis, consent will be specific and informed and can be withdrawn at any time.

The school may also ask parents/carers and pupils to indicate their preferences about particular uses of photographs and videos even where the school is relying on a different lawful basis. This helps us to respect individual preferences and maintain trust and transparency.

We will take reasonable steps to ensure that photographs and videos are not used for purposes that are incompatible with the purpose for which they were collected.

Particular care will be taken where there are safeguarding, court order or other circumstances that mean a pupil should not be publicly identified.

Photographs and videos will be stored securely and retained in accordance with the school's records retention arrangements.

Collecting pupil information

Whilst the majority of pupil information you provide to us is mandatory, some information is provided to us on a voluntary basis.

Where we collect information on a voluntary basis, we will make this clear and explain whether providing the information is optional.

Where appropriate, we may ask parents/carers or pupils to provide consent or indicate their preferences for particular uses of information.

Where consent is relied upon as the lawful basis for processing, consent can be withdrawn at any time.

Withdrawing consent does not affect the lawfulness of processing that took place before consent was withdrawn.

Storing pupil data

We take appropriate technical and organisational measures to protect personal information from unauthorised access, loss, misuse, alteration or disclosure.

We retain personal information only for as long as necessary and in accordance with our legal obligations and the school's records retention arrangements.

Current retention periods include:

Record	Retention period
Admissions documents and appeals	1 year from admission
Complaints files	6 years from resolution
Attendance and lunch registers	3 years
Pupil records	Passed on to the secondary school when the pupil leaves
Parental permission slips for trips and events	Until the trip is concluded without major incident
Parental permission slips for trips and events where there has been a major incident	25 years
Pupil's work	1 year
SATs records	6 years

Record	Retention period
Photographs and videos	In accordance with the school's records retention arrangements and the purpose for which they were collected

Where a particular photograph or video forms part of a permanent school record, publication or historical record, different retention arrangements may apply.

Who do we share pupil information with?

We routinely share pupil information with:

- schools that pupils attend after leaving us;
- our local authority;
- the Department for Education (DfE);
- Social Services, including Early Help;
- the police force; and
- the NHS.

Depending on the particular circumstances and purpose, we may also share relevant information with other organisations where this is lawful and necessary, including organisations providing services to or on behalf of the school.

For example, photographs or videos may be shared with:

- authorised photographers;
- organisations providing school photography or related services;
- local or regional media organisations; and
- providers of school communication or digital platforms.

Where we use an external organisation to process personal data on our behalf, we will take appropriate steps to ensure that data protection requirements are met.

We will not share personal information simply because someone asks for it. We will only share information where there is a lawful basis for doing so and where the sharing is necessary and appropriate.

Why we share pupil information

We may share pupil information where this is necessary to:

- comply with a legal obligation;
- perform a task carried out in the public interest or in the exercise of official authority;
- protect the vital interests of an individual;
- support safeguarding and child protection;
- provide education and related services;
- fulfil statutory education requirements; or
- meet another lawful basis under UK data protection legislation.

Where appropriate, we will seek consent or permission before sharing information, but consent is not required where another lawful basis applies.

Department for Education (DfE) and statutory data collections

We are required to share certain information about our pupils with the Department for Education (DfE) and our local authority as part of statutory data collections.

We are required to share information with the local authority and the Department for Education under relevant education legislation, including the **Education (Information About Individual Pupils) (England) Regulations 2013**.

Data sharing with the DfE supports school funding, educational attainment policy and monitoring and other statutory functions.

To find out more about the data collection requirements placed on schools by the Department for Education, please visit:

https://www.gov.uk/education/data-collection-and-censuses-for-schools

The National Pupil Database (NPD)

The National Pupil Database (NPD) is owned and managed by the Department for Education and contains information about pupils in schools in England.

It provides evidence on educational performance to inform independent research and studies commissioned by the Department.

The information is held electronically for statistical purposes and is securely collected from a range of sources including schools, local authorities and awarding bodies.

We are required by law to provide information about our pupils to the DfE as part of statutory data collections, such as the school census.

The law that allows this includes the **Education (Information About Individual Pupils) (England) Regulations 2013**.

The Department may share information from the NPD with third parties who promote the education or well-being of children in England for purposes including:

- conducting research or analysis;
- producing statistics; and
- providing information, advice or guidance.

The Department has processes in place to ensure the confidentiality of data is maintained and controls access to and use of the information.

Decisions on whether the DfE releases data to third parties are subject to an approval process based on consideration of:

- who is requesting the data;
- the purpose for which it is required;
- the level and sensitivity of data requested; and
- the arrangements in place to store and handle the data.

Organisations granted access to pupil information must comply with requirements covering confidentiality, handling, security, retention and use.

For more information about the Department's data sharing process, please visit:

https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

For information about which organisations the Department has provided pupil information to, and for which projects, please visit:

https://www.gov.uk/government/publications/national-pupil-database-requests-received

To contact the Department for Education:

https://www.gov.uk/contact-dfe

Your data protection rights

Pupils and, where appropriate, parents/carers have rights in relation to personal information held by the school.

Under data protection legislation, individuals have the right to request access to personal information that we hold about them.

To make a request for personal information, or to request access to a child's educational record, please contact:

office@st-saviours.kent.sch.uk

Depending on the circumstances and the lawful basis on which information is processed, individuals may also have the right to:

- have inaccurate personal information corrected;
- request the erasure of personal information;
- request restriction of processing;
- object to processing;
- withdraw consent where consent is the lawful basis for processing; and
- receive personal information in a portable format in circumstances where the right to data portability applies.

Not all rights apply in every circumstance. Some rights are subject to exemptions and conditions under data protection legislation.

Where photographs or videos are processed on the basis of consent, consent can be withdrawn at any time.

Where another lawful basis is used, individuals may have a right to object depending on the circumstances.

Children's privacy rights

Children have their own rights in relation to their personal information.

We will take account of a child's age, understanding and ability to make decisions when explaining privacy matters and responding to requests relating to their personal information.

We encourage children to understand how their personal information, including photographs and videos, may be used.

Where appropriate, we will explain privacy information to children in an age-appropriate way.

How to raise a concern

If you have a concern about the way we are collecting or using personal information, please raise your concern with the school in the first instance.

You can contact us at:

office@st-saviours.kent.sch.uk

You also have the right to raise a concern directly with the Information Commissioner's Office (ICO).

Information about contacting the ICO is available at:

https://ico.org.uk/concerns/

Contact

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

Headteacher
St Saviour's Church of England Junior School
office@st-saviours.kent.sch.uk

Data Protection Officer
Invica Law
1 Abbey Wood Road,
Kings Hill,
West Malling,
ME19 4YT

Email: dpo@invicta.law

Review of this privacy notice

This privacy notice will be reviewed regularly and whenever there is a significant change to the way the school collects, uses or shares personal information.

Date of this version: September 2026