The Golden Thread Alliance

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 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 Trust 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.

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 contact Kate George, via kate.george@golden-thread.org.

Why We Collect and Use Pupil Information

The personal data collected is essential, for the schools within the Trust to fulfil their official functions and meet legal requirements.

We collect and use pupil information, for the following purposes:

- 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 appropriate use of photographs, video and audio recordings for educational, safeguarding, security, communication and administrative purposes, where there is an appropriate lawful basis to do so.
- 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 lawful bases we rely on for processing pupil information are:

The lawful bases for processing personal data are set out in Article 6 of the UK General Data Protection Regulation. The Trust and schools process such data because we have:

(6a) Consent: parents have given clear consent for us to process their (and their child's) personal data for the purposes indicated above.

(6c) A Legal obligation: the processing is necessary for us to comply with the law (e.g. we are required by law to submit certain teacher assessment information and to safeguard pupils' welfare by sharing information with other agencies).

(6d) A duty to safeguard pupils: the processing is necessary in order to protect the vital interests of the data subject (children); (e.g. if we are required to share medical history information with emergency services in the event of an accident or to other agencies when a child may be in danger).

(6e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law (e.g. processing attendance information or academic attainment and progress records).

Special Categories of data are set out in Article 9 of the UK General Data Protection Regulation. The schools and Trust processes such data because we have:

(9.2a) explicit consent. In circumstances where we seek consent, we make sure that the consent is unambiguous and for one or more specified purposes, is given by an affirmative action and is recorded as the condition for processing. Examples of our processing include use of pupil photographs for external purposes, pupil dietary requirements, and health information we receive from our pupils who require a reasonable adjustment to access our services.

(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 social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.

(9.2c) where processing is necessary to protect the vital interests of the data subject or of another natural person. An example of our processing would be using health information about a pupil in a medical emergency.

(9.2f) for the establishment, exercise or defence of legal claims. Examples of our processing include processing relating to any employment tribunal or other litigation.

(9.2g) reasons of substantial public interest. As a Trust, we are a publicly funded body and provide a safeguarding role to young and vulnerable people. Our processing of personal data in this context is for the purposes of substantial public interest and is necessary for the carrying out of our role. Examples of our processing include the information we seek or receive as part of investigating an allegation.

(9.2j) for archiving purposes in the public interest. The relevant purpose we rely on is Schedule 1 Part 1 paragraph 4 – archiving. An example of our processing is the transfers we make to the archives as set out in our Data Retention Policy.

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 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 the post from the previous setting. We may also collect data from you directly.

Pupil data is essential for all 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.

How We Store 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 Policy and how we keep your data safe, please visit the Trust's website.

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.

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

Who We Share Pupil Information With

We routinely share pupil information with:

- 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 Trust or schools
- Other schools within the Trust
- Police CyberAlarm
- Google Workspace for EducationAI Driven Transcription Tools

A full list of suppliers and service providers can be made available, upon request.

Information will be provided to those agencies securely or anonymized, where possible.

The recipient of the information will be bound by confidentiality obligations - we require them to respect the security of your data and to treat it in accordance with relevant legislation.

Why We Regularly Share Pupil Information

We regularly share pupil information where it is necessary to support pupils' education, wellbeing, health, safety and development, and to meet our legal obligations as a Trust and school. Sharing information helps to ensure that pupils receive appropriate educational support, that transitions between schools are managed effectively, and that public bodies can carry out their statutory functions.

Information may also be shared to:

- Safeguard children and young people
- Provide access to healthcare and specialist support services
- Support pupils with SEND
- Monitor educational standards and outcomes
- Allocate funding and resources
- Administer statutory assessments and examinations
- Comply with legislation and regulatory requirements

We only share information that is necessary for the relevant purpose and require recipients to process information securely and confidentially.

Department for Education

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. 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 those data collections, under:

Regulation 5 of The Education (Information About Individual Pupils) (England) 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 'How Government uses your data' section.

For privacy information on the data the Department for Education collects and uses, please see: https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3

and

https://www.gov.uk/government/publications/privacy-information-key-stage-4-and-5-and-adult-education

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.

Standards and Testing Agency

We are required to share data with the Standards and Testing Agency under the Key Stage 1 and Key Stage 2 assessment and reporting arrangements (ARA). This is a statutory requirement and sharing is done under legal obligation and public task lawful bases.

Children's Social Care

We may be required to share data with Children's Social Care for safeguarding purposes, particularly when there is a risk of significant harm to a child. The data shared could be pupil name, CPOMS records. Please also see our Safeguarding and Child Protection Policy.

External Professionals who visit the school (such as Educational Psychologists and Lawyers)

We may be required to share data with external professionals to collaborate and ensure that all aspects of an individual's needs are addressed, whether they are related to health, education or social services. The data shared could be pupil name, educational and behavioural records.

Law Enforcement Officials, such as the Police

We may be required to share data with law enforcement officials for public safety and crime prevention. Sharing data helps law enforcement officials prevent and response to criminal activities more effectively. We also have a legal obligation to share information with law enforcement under certain circumstances, particular if there is a risk of significant harm to a child.

The NHS

We may be required to share data with the NHS such as pupil names, date of birth and parental contact information for them to carry out immunisations and height/weight checks.

Suppliers and Service Providers

We share information with suppliers and service providers to help streamline operations and ensures that they can deliver their services effectively. Information is shared to safeguard pupils, as well as providing an enhanced learning experience.

Voluntary Organisations linked to the Trust or School

We may require to share data with voluntary organisation linked to the Trust or school such as the Parents Association to help facilitate their involvement to enhance the educational experiences for pupils. Engaging parents and carers in school activities is considered a legitimate interest.

Other Schools within the Trust

Sharing data ensure that all schools within the Trust follow consistent practices and standards. This helps maintain uniformity in educational quality and administrative processes. By sharing data, the schools within the Trust can provide better support to its pupils, especially for those that transfer from within. It ensures that the important information about a pupil's academic progress,

special needs and other relevant details are readily available. There are legal obligations to share data within a Trust to ensure transparency, accountability and adherence to educational standards.

Police CyberAlarm

Police CyberAlarm helps monitor and report suspicious cyber activity targeting The Golden Thread Alliance. By sharing data, we can retrieve regular reports on potential threats and vulnerabilities, allowing the Trust to take proactive measures to protect our systems. Sharing the data allows law enforcement to identify, pursue and prosecute cyber criminals. It also helps in meeting the regulatory requirement related to data protection and cyber security.

Google Workspace for Education

Google Workspace for Education is used to support our digital learning environment. We will typically share pupil's name, their school provided email address and year group and/or class. This allows pupils to access school-work and collaborate with others. It is necessary for the performance of our educational tasks.

AI Driven Transcription Tool

To ensure accurate record keeping during parental meetings, colleagues may occasionally use AI-assisted transcription tools. We use these devices to provide an accurate summary of discussions and to ensure that agreed upon actions are captured correctly. We will always ask for your explicit consent before starting any recording and you have the right to decline the use of the recording device, in which case manual notes will be taken. Recordings are processed securely, used only for the purpose of generating a summary and are deleted from the third party AI platform once the transcript is finalised and saved to the school's secure internal systems.

How we use AI

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

We do not use AI for automated decision-making or profiting 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 U KGDPR and that no sensitive data us shared with any AI tools without appropriate safeguards.

Recording of Meetings

To protect the privacy and confidentiality of our pupils, parents, carers and colleagues, meetings, conversations and other interactions must not be audio or video recorded by visitors, parents, carers or other third parties without the prior knowledge and agreement of those involved.

Where the school or Trust considers it necessary to make an audio or video recording for an official purpose, participants will be informed before recording begins and provided with appropriate information about the purpose of the recording and how it will be used. Where consent is the lawful basis relied upon, explicit consent will be obtained before recording commences.

This applies to recordings made using mobile phones, tablets, laptops, cameras, smart watches, smart glasses, AI-enabled devices and any other device or technology capable of capturing or recording audio, images or video.

Any recording made by the school or Trust will be stored securely, accessed only by authorised persons and retained in accordance with the Trust's Data Retention Policy.

Requesting Access to Your Personal Data

Under data protection legislation, 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 Kate George, Executive Assistant, kate.george@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, 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 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 Kate George, Executive Assistant, kate.george@golden-thread.org. We will acknowledge your complaint within 30 days of receipt and take appropriate steps to investigate and respond without undue delay.

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.

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 September 2026.

Contact

If you would like to discuss anything in this privacy notice, please contact: Kate George, Executive Assistant, kate.george@golden-thread.org

How Government Uses Your Data

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)

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

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 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.

To find out more about the NPD, go to https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information

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

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 DfE Hold About You

Under the terms of the Data Protection Act 2018, you are entitled to ask the Department OF 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, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:

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

Further information on what personal information the Department for Education (DfE) holds about you published in the privacy notices for early years foundation stage to key stage 3, and key stage 4 and 5 and adult education. These are available below:

https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3

https://www.gov.uk/government/publications/privacy-information-key-stage-4-and-5-and-adult-education

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