Lamberhurst St. Mary's CE Primary School

Pupil & Parent Privacy Notice

Date Written	18th September 2026
Written By	Satswana DPO
Date Agreed by Governing Body	October 2026
Headteacher	Mrs. C Vickery-Booth
Chair of Governors	Mr. P Edgesmith
Date of next full review	September 2027

Inspired by the Parable of the Sower, all children and adults in our inclusive Christian school community are able to thrive and flourish. Like seeds on good earth, all are nurtured with supportive loving care.

This policy will be reviewed following any lessons learnt and/or updates to national or local guidance and procedures.

	Name	Contact information
Designated Safeguarding Lead (DSL)	Mrs. Charlotte Vickery-Booth	headteacher@lamberhurst.kent.sch.uk
Deputy Designated Safeguarding Lead	Mrs. Nicola Mitchell	dht@lamberhurst.kent.sch.uk
Deputy Designated Safeguarding Lead	Mrs. Carla Belling	senco@lamberhurst.kent.sch.uk
Deputy Designated Safeguarding Lead	Mrs. Lizzy Connors	connorsl@lamberhurst.kent.sch.uk
Headteacher	Mrs. Charlotte Vickery-Booth	headteacher@lamberhurst.kent.sch.uk

Document Control

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Classification	Official — internal use and publication as directed

Purpose and status

This notice explains how Lamberhurst St. Mary's Church of England (VC) Primary School collects and uses personal information about pupils and their parents and carers. It is issued under Articles 13 and 14 of the UK GDPR.

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Review cycle: Annually and whenever a new system or purpose is introduced.

Document owner: Satswana Ltd (outsourced Data Protection Officer) — dpo@satswana.com

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Who We are

Lamberhurst St. Mary's Church of England (VC) Primary School, Pearse Place, Lamberhurst, Tunbridge Wells, Kent, TN3 8EJ, is the data controller for the information described in this notice. We are registered with the Information Commissioner's Office under number [ICO REGISTRATION NUMBER].

Our Data Protection Officer is Satswana Ltd (outsourced Data Protection Officer), who can be contacted at dpo@satswana.com or by post marked "For the attention of the Data Protection Officer" at the school address. Telephone: 01892 890281.

The Information We Hold About Pupils

- Personal identifiers and contacts — name, former names, unique pupil number, date of birth, address, photographs, and the names, addresses, telephone numbers, email addresses and relationship of parents, carers and emergency contacts.
- Characteristics — ethnicity, first language, nationality, country of birth, free school meal eligibility, pupil premium eligibility, service child status and looked-after status.
- Attendance — sessions attended, absences, lateness and the reasons given.
- Assessment and attainment — internal assessments, national curriculum results, examination entries and results, target grades, reading ages and progress data.
- Special educational needs and disability — needs, provision, EHC plans, external professional reports and annual review records.
- Medical and health — allergies, conditions, medication, care plans, immunisations, accidents, first aid given and school nursing information.
- Behaviour and exclusions — incidents, sanctions, rewards, suspensions and permanent exclusions.
- Safeguarding and welfare — child protection and child in need records, early help records, referrals to and from social care and other agencies.
- Post-16 and destinations — courses applied for, references and destination data.
- Access and use of school systems — logins, filtering and monitoring records, printing and network usage, and use of approved educational software.
- Site security — CCTV images and visitor and signing-in records.
- Payments and catering — trip and lunch payments, balances and any biometric catering identifier where you have consented to it.

Why We Use It and Our Lawful Basis

We use pupil information to provide education and pastoral care; to monitor and report on progress; to keep children safe; to meet our statutory duties; to communicate with parents; to manage admissions, attendance and behaviour; to provide catering, transport and trips; to secure our site and systems; and to plan and improve what we do.

Our lawful bases under Article 6 UK GDPR are:

- Public task — most of our processing, being necessary for our task of providing education and looking after pupils.
- Legal obligation — for example the school census and other returns to the Department for Education under the Education Act 1996 and the Education (Information About Individual Pupils) (England) Regulations, safeguarding duties under the Children Act 1989 and 2004, and duties under Keeping Children Safe in Education.
- Contract — where you have bought a service such as a trip, music tuition or wraparound care.
- Vital interests — in a medical emergency or where a child is at immediate risk.
- Consent — for optional things such as photographs used for publicity, biometric catering systems, and optional communications. Where we rely on consent you can withdraw it at any time and this will not affect your child's education.

Where we handle special category data such as health, ethnicity or safeguarding information, we also rely on Article 9(2)(b), (c), (g) or (h) UK GDPR together with the conditions in Schedule 1 of the Data Protection Act 2018, principally those relating to safeguarding children and individuals at risk, and health and social care.

Who We Share Pupil Information With

We do not sell pupil information and we do not share it more widely than we need to. We share information with:

- the Department for Education, including through the school census and the national pupil database;
- Kent County Council, for admissions, attendance, SEND, safeguarding, transport and statutory returns;
- Ofsted and, where applicable, our diocese or trust;
- examination boards and awarding organisations;
- the school nursing service, NHS, child and adolescent mental health services and other health professionals;
- children's social care, the police and other safeguarding partners, where necessary to protect a child;
- the pupil's next school, college or education provider on transfer;
- our software suppliers, who act as our processors under written contracts — including our management information system, safeguarding recording system, cashless payments, learning platforms and email;
- careers services, for pupils aged 13 and over, as required by section 507B of the Education Act 1996 (parents may ask us not to pass on a name, address and date of birth for this purpose);
- our auditors, insurers and legal advisers where necessary.

We only share what is necessary in each case, and we record what we have shared and why.

The National Pupil Database and Youth Support Services

Information we provide to the Department for Education is held in the national pupil database, which the DfE uses for research, statistics and policy. The DfE decides who else may access it under strict terms. You can find out more, and how to contact the DfE, at gov.uk (search "how the DfE shares personal data").

We are required to pass certain information about pupils aged 13 and over to providers of youth support services in Kent County Council. Parents, or pupils aged 16 or over, can ask us to limit this to name, address and date of birth by contacting dpo@satswana.com.

How Long We Keep It

We keep pupil information in line with our Retention Schedule, which follows the Information and Records Management Society Toolkit for Schools. In summary:

- the pupil's main educational record — until the pupil's 25th birthday;
- child protection records — until the pupil's 25th birthday, or longer where required for an inquiry or investigation;
- attendance registers — three years from the end of the academic year;
- accident and incident records involving a child — until the pupil's 25th birthday;
- admissions and appeals records — one year, or ten years for an unsuccessful appeal;
- CCTV footage — 30 days unless extracted for an investigation;
- consents for photographs — for as long as the image is in use.

At the end of the retention period records are securely destroyed and the destruction is recorded.

Automated Decisions and Profiling

We do not make decisions about pupils by automated means alone. Where we use software that flags attendance, behaviour or progress patterns, or that uses artificial intelligence to support teaching, a member of staff always reviews and makes the decision. Tools of this kind are only used after we have completed a Data Protection Impact Assessment. Our list of approved educational technology is available on request.

Providing Information Is Sometimes Optional

Much of the information we ask for is needed to meet a legal duty, and we will tell you when that is the case. Where information is optional — for example ethnicity, some medical details you may choose to add, or photography consent — we will make that clear and you are free not to provide it. If you do not provide information we need for a legal purpose, we may not be able to offer certain services or may have to record the absence of the information.

Your Rights Over Your Information

You have the right to: be informed about how we use your data; request a copy of it (a subject access request); have inaccurate data corrected; ask for data to be erased where we have no continuing reason to hold it; ask us to restrict processing while a concern is resolved; object to processing based on our legitimate interests or public task; receive certain data in a portable format; and withdraw consent at any time where we have relied on consent.

To exercise any right, contact our Data Protection Officer, Satswana Ltd (outsourced Data Protection Officer), at dpo@satswana.com, or write to the Headteacher at Pearse Place, Lamberhurst, Tunbridge Wells, Kent, TN3 8EJ. We respond within one calendar month, and will tell you if we need to extend that for a complex request.

Some rights are qualified. For example, we cannot delete records we are required by law to keep, and we may withhold information where an exemption applies (such as where disclosure would cause serious harm, or would identify a third party or a safeguarding referrer).

If you are unhappy with how we have handled your information, please tell us first so we can put it right. You also have the right to complain to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow SK9 5AF, ico.org.uk/make-a-complaint, 0303 123 1113.

Storing Your Data Outside the UK

Your data is normally stored within the United Kingdom or the European Economic Area. Some of our software suppliers host or support data outside the UK. Where that happens we only transfer data where the country is covered by UK adequacy regulations, or where we have put in place the International Data Transfer Agreement or the UK Addendum to the EU Standard Contractual Clauses, supported by a documented Transfer Risk Assessment. You can ask dpo@satswana.com for details of the safeguards in place.

Pupils Making Their Own Requests

Pupils have the same rights over their own information as adults, and can make a request themselves once they are mature enough to understand what it means. We generally consider that pupils aged 12 and over are able to do so, but we assess each child individually and will take a younger child's wishes into account. Where a parent makes a request on behalf of a child, we consider the child's views and best interests before releasing information.

Parents also have a separate legal right to see their child's official educational record under the Education (Pupil Information) (England) Regulations 2005, which we will provide within 15 school days of a written request.

Document Control

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Data Protection Officer: Satswana Ltd (outsourced Data Protection Officer) — dpo@satswana.com

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Provided by Satswana. Drafted to align with the UK GDPR, the Data Protection Act 2018 and ICO guidance.