

Pupils and Families

Privacy Notice 2025

Red Kite Learning Trust pupils and their families This privacy notice describes how we collect and use personal information about you during and after your work relationship with us, in accordance with the UK General Data Protection Regulation (UK GDPR).

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) is retained EU law and known as UK GDPR. The UK GDPR sits alongside an amended version of the Data Protection Act 2018 that relate to general personal data processing, powers of the Information Commissioner and sanctions and enforcement. The GDPR as it continues to apply in the EU is known as EU GDPR.

This notice applies to all pupils and their families.

Who collects this information?

Red Kite Learning Trust is a 'data controller.' This means we are responsible for deciding how we hold and use personal information about you.

We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice does not form part of any contract to provide services and we may update this notice at any time.

It is important that you read this notice, together with any other policies mentioned within this privacy notice. This will assist you with understanding how we process your information and the procedures we take to protect your personal data.

Data protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

Categories of Pupil Information we Collect, Hold and Share

- Personal information (such as name, unique pupil number and address)
- Emergency contact and family lifestyle information such as names, dates of birth, National Insurance/National Asylum Seekers Numbers, relationship, phone numbers and email addresses
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance information (such as sessions attended, number of absences and reasons for absence)
- Performance and assessment information
- Medical information

- Special educational needs and disabilities information
- Behavioural information (including exclusions and alternative provision information)
- Safeguarding information (such as child in need referral information)
- Biometric data (such as fingerprint for lunch payments)
- Admissions information
- Financial information
- Images of pupils engaging in school activities, and images captured by the School's CCTV system
- Information about the use of our IT, communications and other systems, and other monitoring information
- Transport to school information

How we collect this information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. To comply with the UK General Data Protection Regulation, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

How and why we use your personal information

We will only use your personal information when the law allows us to do so. Most commonly, we will hold pupil data and use it for:

- Pupil selection (and to confirm the identity of prospective pupils and their parents)
- The purposes of providing education and and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs
- Informing decisions such as the funding of schools
- Assessing performance and to set targets for schools
- Safeguarding pupils' welfare and providing appropriate pastoral (and where necessary medical) care
- Supporting teaching and learning
- 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
- Carrying 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 school'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

- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school
- Providing support to pupils after they leave the school
- Establish and monitor eligibility for additional support (such as Free School Meals)

Legal reasons for using this information

We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Consent: the individual has given clear consent to process their personal data for a specific purpose
- Contract: the processing is necessary for a contract with the individual
- Legal obligation: the processing is necessary to comply with the law (not including contractual obligations)
- Vital interests: the processing is necessary to protect someone's life
- Public task: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law; and
- The Education Act 1996: for Departmental Censuses 3 times a year. More information can be found at: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

We need all the categories of information in the list above primarily to allow us to comply with legal obligations. Please note that we may process information without knowledge or consent, where this is required or permitted by law.

How we use particularly sensitive information

Special categories of particularly sensitive personal information, such as information about your health, racial or ethnic origin, sexual orientation, or biometrics require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent
- Where we need to carry out our legal obligations in line with our data protection policy
- Where it is needed in the public interest, such as for equal opportunities monitoring
- Where it is necessary to protect you or another person from harm
- Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public

Sharing Data

We may need to share your data with third parties where it is necessary. There are strict controls on who can see your information. We will not share your data if you have advised us that you do not want it shared unless it's the only way we can make sure you stay safe and healthy, or we are legally required to do so.

In some cases, your data will be outsourced to a third-party processor who provides a service to us. Where the school outsources data to a third-party processor, the same data protection standards that the school upholds are imposed on the processor.

We share pupil information with:

- The Department for Education (DfE) - on a statutory basis under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013
- Ofsted
- Other Schools that pupils have attended/will attend
- NHS
- Welfare services (such as social services)
- Law enforcement officials such as police, HMRC
- Local Authority Designated Officer
- Professional advisors such as lawyers and consultants
- Support services (including insurance, IT support, information security)
- Providers of learning software such as Timetables Rockstar and Edukey and
- The Local Authority
- Youth support services – under section 507B of the Education Act 1996, to enable them to provide information regarding training and careers as part of the education or training of 13–19-year-olds
- Other schools within the Trust

The Department for Education request regular data sharing on pupil attendance to help support those vulnerable students and to assist with intervention strategies. Further information on how the Department for Education collects this data will be made available on the school website.

Information will be provided to those agencies securely or anonymised 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 the law.

We may transfer your personal information outside the UK and the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Biometric Data

At some of our Trust Schools, we would like to use your information as part of an automated (i.e. electronically operated) recognition system. This is for the purposes of purchasing food in the cafeteria. The information that we wish to use is referred to as 'biometric information'. This data will only be processed once we have obtained appropriate consent. For further information in relation to this, please see each school's Biometrics Policy.

Retention Periods

Except as otherwise permitted or required by applicable law or regulation, Red Kite Learning Trust only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

Information about how we retain information can be found in our Data Retention policy:

[RKLT Data Protection Policy](#)

Security

We have put in place measures to protect the security of your information (i.e., against it being accidentally lost, used or accessed in an unauthorised way). In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

You can find further details of our security procedures within our Data Protection Policy: [RKLT Data Protection Policy](#)

It is important that the personal information we hold about you is accurate and current. Please keep us informed if yours or your child's personal information changes while your child attends our school.

Youth support services

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

A parent / guardian can request that **only** their child's name, address and date of birth is passed to their local authority or provider of youth support services by informing us. This right is transferred to the child / pupil once he/she reaches the age 16.

Our 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 visit our local authority website.

DfE 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.

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 and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013.

To find out more about the NPD, go to:

[Find and explore data in the National Pupil Database - GOV.UK \(education.gov.uk\)](https://www.gov.uk/education/national-pupil-database)

The department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- Conducting research or analysis
- Producing statistics
- Providing information, advice, or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment 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

For more information, follow the link below:

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

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

For information about which organisations the department has provided pupil information, (and for which project), please visit the following website:

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

Your Rights of Access, Correction, Erasure and Restriction

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Should you require further advice, please contact Red Kite Learning Trust in writing: info@rklt.co.uk or call 01423 574410.

Under certain circumstances by law you have the right to:

- Access your personal information (commonly known as a “subject access request”). This allows you to receive a copy of the personal information we hold about you and to check we are lawfully processing it. You will not have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected
- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it
- Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it
- To object to processing in certain circumstances (for example for direct marketing purposes)
- To transfer your personal information to another party
- If you want to exercise any of the above rights, please contact Red Kite Learning Trust (as above)
- 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)

How to Raise a Concern

We hope to resolve any query you raise about our use of your information in the first instance.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by Red Kite Learning Trust, then you can contact the DPO on the details below: -

Data Protection Officer: HY Education, HY
Education Solicitors Limited
Address: Sandbrook House, Sandbrook Way,
Rochdale, OL11 1RY
Email: dpo@wearehy.com
Telephone: 0161 543 8884
Web: <https://hyeducation.co.uk>

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues.

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.