THE HOWARD
Academy Trust

Privacy Notice Pupils, Parents and Carers

Date of last review: March 2026

THE HOWARD Academy Trust

Privacy Notice Pupils, Parents and Carers

Applicable to:	Pupils, Parents and Carers
Dissemination:	The Notice will be available to Pupils, Parents and Carers via the Trust and its academies websites. It is available to staff via the Trust's Policy Centre and website
Training:	Annually as part of Data Protection training
Review frequency:	The Notice will be reviewed Annually. The Notice will be reviewed earlier if needed in the light of new evidence, legislation and guidance
Notice Author:	Patricia Field – Trust Data Manager
Executive Policy Owner:	Cathy Reid – Deputy CFO
Approval by:	Level 3 – Chief Executive Approval
Approval date:	March 2026
Next review date:	March 2027

Revision History

Document Version	Description of Revision	Date Approved
V1	Notice updated following legislation changes	March 2024
V2	Notice updated following legislation changes	March 2025
V3	Notice updated following changes in legislation including revised complaint handling section to reflect Section 164A DPA 2018 (as amended by DUAA 2025). Individuals must now submit complaints directly to the organisation.	March 2026

THE HOWARD Academy Trust

Contents

Privacy Notice Pupils, Parents and Carers 2
Revision History 2
Notice Statement 4
Data Protection Officer (DPO) 4
How We Use Pupil Information 5
The Categories of Pupil Information That We Process Include: 5
Why We Collect and Use Pupil Information 6
How We Collect & Store Pupil and Carer Information 7
Who We share Information With 7
Youth Support Services 8
Pupils Aged 13+ 8
Pupils Aged 16+ 8
Requesting Access to Your Personal Data 9
Withdrawal of Consent and the Right to Lodge a Complaint 9
Contact, Full Privacy Notice & How Government Uses Your Data 9

Privacy Notice Pupils, Parents and Carers

Notice Statement

The Howard Academy Trust collects data and information about parents / carers and pupils so that we can operate effectively as a Trust. This abridged privacy notice explains how and why we collect parent / carer and pupil data, what we do with it and what rights parents have.
The Howard Academy Trust ("THAT"), a multi academy trust and is a charitable company limited by guarantee (registration number 09175427) whose registered office is at South Side Three Road, Chatham, Kent, ME4 4FQ. The Trust is the Data Controller for all the academies/schools within the Trust. Schools within the Trust include:

- Deanwood Primary School – Long Catlis Road Parkwood Gillingham Kent ME8 9TX
- Miers Court Primary School – Silverspot Close Rainham Kent ME8 8JR
- Hurstmere School - Hurst Road Sidcup Kent DA15 9AW
- Temple Mill Primary School – Cliffe Road Strood Rochester Kent ME2 3NL
- Thames View Primary School – Bloors Lane Rainham Gillingham Kent ME8 7DX
- The Abbey School – London Road Faversham Kent ME13 8RZ
- The Howard School – Derwent Way Rainham Gillingham Kent ME8 0BX
- The Rowans Silverbank Churchill Avenue Chatham Kent ME5 0LB
- Waterfront UTC – South Side Three Road Chatham Kent ME4 4FQ

The term "parent" is widely defined in education law to include the natural or adoptive parents (regardless of whether parents are or were married, whether a father is named on a birth certificate or has parental responsibility for the pupil, with whom the pupil lives or whether the pupil has contact with that parent), and also includes non-parents who have parental responsibility for the pupil, or with whom the pupil lives. It is therefore possible for a pupil to have several "parents" for the purposes of education law. This privacy notice also covers other members of pupils' families who we may process data about from time to time, including, for example, siblings, aunts and uncles and grandparents.

Data Protection Officer (DPO)

The Howard Academy Trust's Data Protection Officer is:

SchoolPro TLC LTD

Email: DPO@schoolpro.uk

The Howard Academy Trust's Data Protection Lead is:

Trust Data Manager
The Howard Academy Trust
C/O Waterfront UTC
South Side Three Road
Chatham
Kent

Email: dpo@thatrust.org.uk

How We Use Pupil Information

This abridged Privacy Notice explains how and why we store personal information about pupils and parents/carers. It provides a guide to parents/carers about our legal obligations and their own rights. Like any organisation which handles personal data, The 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. For the full Privacy Notice, please contact the academy/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 contact dpo@thatrust.org.uk.

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 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
- Enabling pupils to take part in assessments, to publish the results of examinations and to record pupil achievements
- Legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care
- Monitoring use of the school's IT and communications systems in accordance with the school's IT security policy
- To comply with the law regarding data sharing
- To meet the statutory duties placed upon us for DfE data collections

We use the parents' data:

- To assess the quality of our services
- To comply with the law regarding data sharing
- To ensure financial stability
- to support schools with their admission processes
- to support schools to maintain a waiting list
- to support school's pupil learning
- to support schools, monitor and report on pupil progress
- to support schools to provide appropriate pastoral care
- to support the bursary process
- to assess the quality of our services
- for the protection and welfare of pupils and others in the school, including our safeguarding / child protection obligation
- for the safe and orderly running of the Trust
- to promote the Trust and schools
- to send you communications that may be of interest to you which may include information about Trust and school events or activities, news, campaigns, appeals, other fundraising activities
- in order to respond to investigations from our regulators or to respond to complaints raised by our stakeholders
- in connection with any legal proceedings threatened or commenced against the Howard Academy Trust or its member academies.

This list is not exhaustive, for more information please contact dpo@thatrust.org.uk.

Under the UK General Data Protection Regulation (UK GDPR), the legal basis / 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 Howard Academy Trust and its member academies 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 and Carer Information

We collect information about pupils and parents / carers before pupils join The Howard Academy Trust and its member academies and update it during pupils' time on the roll as and when new information is acquired.

We collect pupil information that you provide via the admission system Applicaa or registration forms at the start of the school year. We also collect information via Common Transfer File (CTF) or secure file transfer from the previous setting. We will collect additional information as needed from other sources as needed during a pupil's time on roll.

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 or see our Data Protection Policy.

Who We share 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:

- School governors / trustees;
- Our local authority and or a pupil's home local authority (if different)
- Schools that the pupil attends after leaving us
- 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)
- Law enforcement officials such as the Police or Courts if ordered to do so
- The NHS
- Suppliers and service providers with whom we have a contract
- Voluntary organisations linked to the school
- Schools that pupil attends after leaving us
- The Police and law enforcement agencies
- Suppliers and service providers with whom we have a contract
- The Teaching Regulation Authority
- Prevent teams in accordance with the Prevent Duty on academies

- Other academies/Schools, for example, if we are negotiating a managed move and we have your consent to share information in these circumstances
- Our legal advisors
- Our insurance providers / the Risk Protection Arrangement

We do not share information about our pupils and parents /carers with anyone without consent unless the law and our policies allow us to do so.

Youth Support Services
Pupils Aged 13+
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

The information shared is limited to the child's name, address and date of birth. However where a parent or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the child / pupil once they reach the age 16.

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 contact the school or visit the local authority website.

Learning Records Service
Students aged 14+:
For students enrolling for post 14 qualifications, the Learning Records Service will give us a student's unique
learner number (ULN) and may also give us details about the student's learning or qualifications.
Department for Education (DfE)
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)

This list is not exhaustive for additional information please contact dpo@thatrust.org.uk.

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 The Howard Academy Trust dpo@thatrust.org.uk or its member academies at the school office

Depending on the lawful basis used for processing data (as identified above), you may also have other rights as per the UK GDPR.
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 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

Withdrawal of Consent and the Right to Lodge a Complaint

Where we process your personal data based on your consent, you have the right to withdraw that consent at any time.
To request the withdrawal of your consent, please contact The Howard Academy Trust at DPO@Thatrust.org.uk We will respond to your request promptly and ensure that your data is no longer processed on the basis of consent, unless another lawful basis applies.

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 us directly at DPO@Thatrust.org.uk We will acknowledge your complaint within 30 days of receipt and take appropriate steps to investigate and respond without undue delay.
If you are not satisfied with our response, you may escalate your complaint to the Information Commissioner at: Information Commissioner's Office

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 Pupils & Parents Privacy Notice (including how the Government uses your data), please contact:
The Howard Academy Trust DPO@Thatrust.org.uk

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 March 2026