Multi Academy Trust Policy

Common Trust Policy, Use as Published

Privacy notice for Early Years

(for nursery and early years provision across Aquila, The Diocese of Canterbury Academies Trust)

Date adopted by Trust Board: March 2026

Date of Review: March 2026

Date of next Review: March 2028

Version	Date	Author	Change Description
1.1	September 2026	T.Howard	Minor amendment to include Free School Meal eligibility information within funding and eligibility data, where applicable. Administrative correction to section numbering.

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Privacy Notice for Early Years Children and Families

This privacy notice explains how Aquila, The Diocese of Canterbury Academies Trust collects, uses and protects personal information about children attending early years provision within our Trust schools, and about their parents or carers.

We are required to provide this information under UK data protection law (UK GDPR and the Data Protection Act 2018).

1. Who We Are

Aquila, The Diocese of Canterbury Academies Trust is the data controller for personal information processed by schools within the Trust.

The Trust is registered with the Information Commissioner's Office (ICO) as a data controller.

Aquila, The Diocese of Canterbury Academies Trust
Suites 19 & 20 Motis Business Centre
Cheriton High Street
Folkestone
Kent CT19 4QJ

The Trust has appointed a Data Protection Officer (DPO) who oversees compliance with data protection legislation.

Data Protection Officer
Tracey Howard
Email: DPO@aquilatrust.co.uk
Telephone: 01303 905103

Individual schools within the Trust also have a Data Protection Representative who manages day-to-day data protection matters locally.

2. The Personal Information We Collect

In order to provide education, childcare and support services, we collect personal information about children and their parents or carers.

This may include:

Child's personal details

- Name
- Date of birth
- Gender
- Home address and postcode

Characteristics and additional needs

- Special Educational Needs (SEN) information
- Ethnicity
- Relevant medical information
- Dietary requirements or allergies

Parent and carer information

- Names and contact details
- Address and postcode
- National Insurance number or National Asylum Support Service number (where required for funding eligibility)

Funding and eligibility information

- Free entitlement information
- 30 hours childcare codes
- Eligibility checks
- Free School Meal eligibility information, where applicable

Attendance information

- Sessions attended
- Absence information and reasons

Safeguarding and welfare information

- Information relevant to a child's wellbeing, care or safeguarding where required

3. Information We Receive from Other Organisations

We may also obtain information from other organisations where this is necessary to support the child's education, welfare or funding.
These may include:

- Kent County Council (KCC)
- Health visitors or healthcare professionals
- Previous early years providers or schools
- Social care services
- Local authority SEND teams

4. How We Use Personal Information

We use personal information in order to:

- Check eligibility for funded early years places
- Provide appropriate education and childcare
- Support children's learning and development
- Provide pastoral care and safeguarding support
- Secure funding for early years provision
- Monitor attendance and participation
- Assess and improve the quality of our services
- Meet legal and regulatory requirements
- Comply with statutory data collections
- Safeguard and promote the welfare of children

5. Our Lawful Basis for Using Personal Data

Under UK GDPR, the lawful bases we rely on include:
Public Task (Article 6(1)(e))
Processing is necessary for the performance of a task carried out in the public interest, including providing education.
Legal Obligation (Article 6(1)(c))
Processing is required to comply with education law.
Relevant legislation includes:

- Education Act 1996
- Children Act 1989
- Childcare Act 2006
- Education (Information About Individual Pupils) (England) Regulations 2013

Where we process special category data (such as health information or ethnicity), we rely on:

- Substantial public interest
- Safeguarding of children
- Provision of education and social care services

6. How Long We Keep Personal Information

We retain early years records in line with the Aquila Data Retention Policy and guidance from the Information and Records Management Society (IRMS).
Typically:

- Records relating to pupils are typically retained until the child reaches the age of 25, in line with IRMS guidance and the Trust Data Retention Policy
- Financial records are retained for 7 years

After this time, records are securely archived or destroyed.

7. Who We Share Personal Information With

We do not share personal information unless the law allows us to do so, or where it is necessary to provide education and safeguarding support.
We may share information with:

- Kent County Council (KCC) – for early years funding and statutory services
- Department for Education (DfE) – through statutory data collections
- Other local authorities or early years providers – to resolve funding or eligibility queries
- Health services and NHS providers – where necessary to support children's health and wellbeing
- Multi-agency safeguarding partners including social care and police where required
- Schools attended after leaving early years provision
- Contracted service providers working on behalf of the Trust

Information is only shared where it is lawful and necessary.

International Data Transfers
Where personal data is transferred outside the UK, we ensure appropriate safeguards are in place in accordance with UK data protection law.

8. The National Pupil Database (NPD)

We are required by law to provide information about children to the Department for Education (DfE) through statutory data collections such as the Early Years Census.
Some of this information is stored in the National Pupil Database (NPD).
The NPD is used to:

- monitor education policy
- support research
- improve outcomes for children and young people.

The DfE may share anonymised or controlled data from the NPD with organisations conducting approved research.
Further information can be found at:
https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information

9. Your Data Protection Rights

Under UK data protection law you have rights including:

- The right to be informed about how your information is used
- The right to access personal information we hold (Subject Access Request)
- The right to request correction of inaccurate data
- The right to request deletion of data in certain circumstances
- The right to restrict or object to processing
- The right to withdraw consent where processing is based on consent

Requests can be made by contacting the Trust's Data Protection Officer.

10. Keeping Your Information Secure

We take the security of personal information seriously.
We have appropriate technical and organisational security measures in place to protect personal data from:

- unauthorised access
- accidental loss
- misuse or disclosure

Only staff who require access to personal data in order to perform their duties are permitted to access it.

11. Complaints

If you have concerns about how we handle personal information, please contact the Trust's Data Protection Officer in the first instance.
You also have the right to complain to the Information Commissioner's Office (ICO):
https://ico.org.uk/concerns
Telephone: 0303 123 1113

12. Contact Us

If you have any questions about how personal information is used, please contact:
Tracey Howard
DPO@aquilatrust.co.uk