FEDERATION OF GORING AND STOKE ROW CHURCH OF ENGLAND PRIMARY SCHOOLS

PRIVACY NOTICE FOR PUPILS

Policy reviewed and agreed by:	Chair of Governors
Date:	September 2026
Next review:	September 2029

The Federation of Goring and Stoke Row Church of England Primary Schools is the Data Controller for the use of personal data in this privacy notice

The categories of pupil information that we collect, hold and share include:

- Personal information (such as name, unique pupil number, contact details and address)
- Characteristics (such as ethnicity, language and free school meal eligibility)
- Special educational needs (including the needs and ranking)
- Medical and administration (such as GP information, child health, dental health, allergies, medication and dietary requirements)
- Attendance information (such as sessions attended, number of absences and absence reasons, and any previous schools attended)
- Assessment information relating to academic performance (such as key stage 1 & 2 and phonics results)
- Behavioural information (such as exclusions and any relevant alternative provision put in place)
- Information relating to the safety of pupils
- Parental payments made for items such as school trips and school meals.

Why we collect and use this 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 the following purposes:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to ensure the safety of the child
- to assess the quality of our services
- to meet the statutory duties placed upon us by the Department for Education.

To conform with the requirements of GDPR (General Data Protection Regulation) all data is handled according to the terms of our Privacy Notice. A copy of this is available on our school website.

The lawful basis on which we use this information

Under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, we must have a lawful basis for processing personal data. We generally rely on public task and legal obligation where processing is necessary for our functions and statutory duties. Where appropriate, we may rely on another lawful basis, such as consent or vital interests.

Our processing must have an Article 6 lawful basis under the UK GDPR. The particular lawful basis depends on the purpose for which the information is being processed.

Where we process special category data, such as health information, we also rely on an appropriate Article 9 condition under the UK GDPR and, where applicable, the Data Protection Act 2018.

Under the terms of the Education Act 1996, we supply specified census data to the Department for Education (DfE) https://www.gov.uk/education/data-collection-and-censuses-for-schools.

Collecting pupil information

We collect pupil information via different methods. Parents complete registration forms when their child starts school and these are stored securely for the required period of time.

Pupil data is essential for the school's operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the 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.

Storing pupil data

We retain pupil information only for as long as is necessary for the purpose for which it was collected and in accordance with our Data Retention Policy and retention schedule. Different types of records have different statutory or operational retention periods.

For more information about how we collect, use, store, share and protect personal data, please see the Federation Data Protection Policy and Data Retention Policy on the school website.

Who we share pupil information with

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- the local authority
- the DfE
- school nurse service
- services that provide SEND support
- services that provide pastoral and pupil safety support.

Why we share pupil information

We only share pupil information where there is a lawful basis to do so. This may be because sharing is required by law, is necessary for our public tasks or safeguarding responsibilities, or is otherwise permitted under data protection legislation. Consent is not required where another lawful basis applies.

We share pupil data with the DfE on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

The Department for Education

The 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)

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either directly or via our local authority for the purpose of those data collections, under section 3 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 below.

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.

Requesting access to your personal data

Under the UK GDPR, individuals have the right to request access to personal data we hold about them. This is known as a Subject Access Request (SAR). A SAR can be made verbally or in writing and does not need to use the words 'Subject Access Request' or refer to the UK GDPR. To make a request, contact the Data Protection Officer whose details can be found on the school website.

Subject Access Request (SAR) process

Recognise and record the request. Record the date received, the requester, the data subject, the scope of the request and the member of staff responsible for coordinating it.

Acknowledge the request and check identity or authority. Where necessary, seek proportionate evidence of identity or authority to act for another person. We will not routinely demand excessive identification.

Consider requests involving children. Where a request concerns a child's personal data, we will consider whether the child is mature enough to understand their rights and whether the person making the request has authority to act on the child's behalf. The child's rights, welfare and privacy will be considered.

Clarify the request where reasonably necessary. If the request is unclear, we may seek clarification where this is reasonably required to locate the information. Where the law permits the response period to be paused while clarification is awaited, we will record the date and correspondence.

Carry out a reasonable and proportionate search. We will identify the systems, files, emails, paper records and other sources likely to contain the individual's personal data and carry out a reasonable and proportionate search.

Review the information before disclosure. We will consider information relating to other people, legal professional privilege, safeguarding and any other applicable exemptions or restrictions. We will seek advice from the Data Protection Officer (DPO) where required.

Prepare the response. We will provide the personal data and required supplementary information in clear and accessible language.

Provide the information securely. Electronic information will normally be provided in a commonly used electronic format unless another format is requested or appropriate. Information will be shared securely.

Meet the statutory timescale. We will respond without undue delay and normally within one month of receipt of the request, or within one month of receiving information reasonably required to confirm

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identity or authority. In complex cases or where there are multiple requests, the response period may be extended by up to a further two months where the legal conditions are met. The requester will be informed within the required timeframe.

Keep a complete record. We will retain a record of the request, searches undertaken, decisions made, exemptions relied upon, correspondence and the date and method of response.

If access is refused in whole or in part. We will explain the reasons where required and advise the requester of their right to complain to the Information Commissioner's Office (ICO) and/or use the Federation's complaints process as appropriate.

A request for a pupil's education record is a separate access right under education regulations. Where a request concerns both personal data and an education record or other official information, we will consider the relevant parts under the appropriate legal framework. A request for an individual's own personal information should be treated as a SAR even if the requester describes it as an FOI request.

You also have the right to:

- request the deletion or removal of personal data where there is no compelling reason for its continued processing
- restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you
- have your personal data rectified if it is inaccurate or incomplete

If you have a concern about the way we are collecting or using your personal data, please raise your concern with us in the first instance through the School Office. You also have the right to complain to the Information Commissioner's Office (ICO): https://ico.org.uk/concerns/

For further information on how to request access to personal information held centrally by DfE, please see the 'How Government uses your data' section below.

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 the School Office.

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 April 2026.

Contact

If you would like to discuss anything in this privacy notice, make a Subject Access Request, or contact the Data Protection Officer (DPO), please contact the School Office.

Further information about your data protection rights is available from the Information Commissioner's Office (ICO): https://ico.org.uk/

How Government uses your data

The pupil data that we lawfully share with the 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, 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 DfE (eg, 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 DfE 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 DfE. 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 DfE

The law allows the Department to share pupils' personal data with certain third parties, including:

- schools
- 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 DfE's 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 DfE to request access to individual level information relevant to detecting that crime.

For information about which organisations the Department 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 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 DfE, you should make a 'subject access request'. Further information on how to do this can be found within the DfE's personal information charter that is published at the address below:

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

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

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