



**GLENMERE COMMUNITY
PRIMARY SCHOOL**



At Glenmere we are GREAT! Because
we:
Grow, Respect, Enjoy, Achieve
Together

Data Protection Privacy Notice

July 2025

Signed by:

Headteacher

Date:

Chair of governors

Date:

1. Introduction

Glenmere Primary School is committed to protecting the privacy and security of personal data. This privacy notice explains how we collect, store, and process personal data about pupils, parents/carers, staff, and other individuals connected to our school. We do this in compliance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018).

We are a "data controller" for the purposes of data protection law. This means we are responsible for deciding how we hold and use personal information about you.

2. The Personal Data We Collect

We collect and process a range of personal data, which may include:

For Pupils:

- **Personal identifiers:** Name, date of birth, unique pupil number (UPN), address, contact details.
- **Family information:** Parents'/carers' names and contact details, emergency contacts, family circumstances.
- **Attendance information:** Sessions attended, absences, and reasons for absence.
- **Academic information:** Assessment data, progress, national curriculum results.
- **Behavioural information:** Records of behaviour, exclusions, rewards.
- **Special Educational Needs and Disability (SEND) information:** SEND status, support plans (e.g., EHCPs), assessments.
- **Medical information:** Allergies, medical conditions, medication administered, IHCPs.
- **Photographs/CCTV:** Images for identification, school records, or security purposes.
- **Dietary requirements:** Any special dietary needs due to allergies or beliefs.
- **Free school meal eligibility:** Information to determine eligibility.
- **Characteristics:** Ethnicity, language, religion (collected for monitoring purposes).
- **Safeguarding information:** Any concerns raised, referrals made.

For Parents/Carers:

- **Personal identifiers:** Name, address, contact details.
- **Financial information:** For school trips, meal payments (though often processed via third parties).
- **Emergency contact details**
- **Relationship to pupil(s)**

For Staff:

- **Personal identifiers:** Name, address, contact details, date of birth, national insurance number.
- **Recruitment information:** CVs, application forms, references, qualifications.
- **Employment details:** Contract, salary, bank details, pension information, performance reviews, training records.
- **Medical information:** Occupational health records, sick leave.
- **Criminal records information (DBS checks).**
- **Safeguarding information.**
- **Equality monitoring information:** Ethnicity, religion, sexual orientation (provided voluntarily).

3. How We Collect Personal Data

We collect personal data through various sources, including:

- Information provided directly by you (e.g., on admission forms, consent forms, job applications).
- Information from previous schools or educational settings.
- Information from health and social care professionals (with consent where required).
- Information from the Department for Education (DfE) and local authorities (e.g., pupil census data).
- CCTV systems for safety and security.

4. Why We Collect and Use Your Personal Data (Lawful Basis)

We collect and use personal data for a variety of purposes, relying on specific legal bases under GDPR. These include:

- **To carry out our public task as a school:**
 - To provide education and support to pupils.
 - To monitor and report on pupil progress and attainment.
 - To ensure the well-being and safeguarding of pupils.
 - To administer admissions, attendance, and exclusions.
 - To support pupils with special educational needs or medical conditions.
 - To manage staff employment and payroll.
 - To manage school finances and resources.
- **Legal Obligation:** To comply with legal duties, such as those related to safeguarding, health and safety, and statutory returns to the DfE.
- **Vital Interests:** In emergencies where data is needed to protect an individual's life.
- **Legitimate Interests:** Where processing is necessary for our legitimate interests (or those of a third party), provided these are not overridden by your rights (e.g., for school security via CCTV, or for research and statistical purposes with anonymised data).
- **Consent:** In specific circumstances where we ask for explicit consent (e.g., for certain photographs or participation in optional activities). Where consent is used, you have the right to withdraw it at any time.

Sensitive Personal Data (Special Category Data): For "special category data" (e.g., health information, ethnicity, religion), we have additional lawful bases, such as:

- Necessary for reasons of substantial public interest (e.g., safeguarding, equality monitoring).
- Necessary for the provision of health or social care.
- Necessary for employment, social security, or social protection law.
- With explicit consent.

5. Who We Share Personal Data With

We may share personal data with third parties where legally required or permitted, and where it is necessary to fulfil our functions as a school. This may include:

- **The Department for Education (DfE):** For statutory census returns and other reporting.
- **Local Authorities:** For services such as admissions, SEN support, safeguarding, and attendance.

- **Health and Social Care Professionals:** Including NHS (school nurses, doctors), social workers, therapists, and counsellors, to support pupils' well-being and medical needs.
- **Other Schools/Educational Settings:** When a pupil transfers to a new school.
- **Exam Boards/Awarding Bodies.**
- **Ofsted.**
- **Police or other law enforcement agencies.**
- **Professional advisors:** Including auditors, legal advisors, and HR consultants.
- **IT system providers:** For school management systems, email, etc.
- **Third-party service providers:** For school trips, catering, payment systems, etc. (with appropriate data processing agreements in place).

We will only share personal data with third parties where we have a lawful basis to do so and have appropriate agreements or safeguards in place to ensure data is protected.

6. How We Store Personal Data

We store personal data securely, in both electronic and paper formats. We have robust security measures in place to prevent personal data from being accidentally lost, used, or accessed in an unauthorised way. These measures include:

- Access controls and password protection for electronic systems.
- Physical security for paper records.
- Encryption where appropriate.
- Regular staff training on data protection.

7. How Long We Keep Personal Data

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including for legal, accounting, or reporting requirements. Our data retention schedule specifies how long different types of data are kept. For example:

- Pupil records are typically retained for a set period after they leave the school.
- Staff employment records are retained for a period after employment ceases.
- Medical records may have specific retention periods.

Once data is no longer required, it is securely disposed of.

8. Your Data Protection Rights

Under data protection law, you have several rights regarding your personal data. These include the right to:

- **Access:** Request a copy of the personal data we hold about you (Subject Access Request).
- **Rectification:** Request that inaccurate or incomplete data be corrected.
- **Erase (Right to be forgotten):** Request the deletion of your personal data in certain circumstances.
- **Restriction of processing:** Request that we limit the way we use your data.
- **Data portability:** Request your data in a structured, commonly used, and machine-readable format.
- **Object:** Object to the processing of your data, particularly where we rely on legitimate interests.
- **Withdraw consent:** Where we process data based on your consent, you can withdraw this at any time.

These rights are not absolute and may be subject to certain conditions and exemptions.

9. How to Exercise Your Rights

If you wish to exercise any of your data protection rights, please contact our Data Protection Officer (DPO) at the contact details provided at the beginning of this notice.

We will respond to your request as soon as possible and within one month, unless the request is complex, in which case we may extend the period by a further two months.

10. Complaints

If you have concerns about how we have handled your personal data, please contact our DPO in the first instance. We will endeavour to resolve your concerns.

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).

- **ICO Website:** www.ico.org.uk
- **ICO Helpline:** 0303 123 1113

11. Changes to This Privacy Notice

We may update this privacy notice periodically to reflect changes in our data processing practices or legal requirements. The most up-to-date version will always be available on our school website.