



## Privacy Notices

St Paul's CofE Primary School & Nursery  
Privacy Notices 2026-27

Last reviewed: August 2026

Next review: August 2027

### 1. About these privacy notices

St Paul's CofE Primary School & Nursery, The Cardinals, Tongham, Farnham GU10 1EF is the data controller for the personal information it processes about pupils, parents and carers, staff, job applicants, governors, volunteers, visitors, contractors and suppliers.

We process personal data in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data (Use and Access) Act 2025. These notices explain what information we collect, why we use it, where it comes from, who we may share it with, how long we keep it and the rights people have over their information.

Our Data Protection Officer is Helen Holdaway, School Business Manager. She can be contacted at [sbm@stpaulstongham.com](mailto:sbm@stpaulstongham.com) or via the school office on 01252 400222.

These notices should be read alongside the school's Data Protection and UK GDPR Policy 2026-27, CCTV Code of Practice, Online Safety Policy and relevant safeguarding, recruitment and records-management procedures.

### 2. Privacy notice for pupils and parents/carers

#### 2.1 Information we collect

We may collect and process information including pupil name, date of birth, sex, address, contact details and unique pupil number; parent/carer names, contact details, parental responsibility and family relationships; admissions, attendance and absence information; assessment, attainment, progress, curriculum and educational records; behaviour, exclusions, pastoral and safeguarding information; special educational needs and disabilities information, including EHCP-related information where applicable; health, medical, allergy, medication and dietary information; characteristics such as ethnicity, language, religion and eligibility for support or funding; photographs, video and other images where appropriate; information about use of school systems, devices and networks where necessary for safeguarding, security, teaching or administration; payment and funding information where relevant; and correspondence and records of contact with the school.

Some of this is special category data, for example health, ethnicity, religion or biometric data. Where we process criminal offence information or special category data, we identify an additional lawful condition as required by law.

#### 2.2 Why we use pupil and parent/carer information

We use this information to provide education, nursery provision, pastoral care and safeguarding; support teaching, learning, assessment and progress; manage admissions, attendance, behaviour and school organisation; identify and meet SEND, medical and other support needs; provide meals, trips, clubs, wraparound care and other school services; communicate with pupils and families; meet statutory census, funding, safeguarding, public-health and reporting duties; keep pupils, staff and visitors safe; manage complaints, concerns and legal claims; administer payments and funding where relevant; and improve, evaluate and plan school provision.

#### 2.3 Our lawful bases



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Depending on the purpose, we normally rely on legal obligation, public task or exercise of official authority, vital interests where necessary to protect someone's life, contract where relevant to a service or agreement, and consent where the law requires or where the activity is genuinely optional, such as some uses of photographs or promotional material. Where we rely on consent, it can be withdrawn at any time without affecting processing that was lawful before withdrawal.

### **2.4 Where the information comes from**

Information may come directly from pupils and parents/carers, previous schools or settings, Surrey County Council, the Department for Education, health and social care services, safeguarding partners, professionals involved with the child, government agencies and approved school systems or service providers.

### **2.5 Who we share information with**

Where necessary and lawful, we may share information with the Department for Education and other government bodies; Surrey County Council and other local authorities; schools and education settings to which a pupil transfers; health, social care and safeguarding services; the police, courts and other statutory agencies; examination, assessment and education service providers; approved IT, MIS, safeguarding, communications and learning-platform providers; catering, transport, trip, club and other service providers where necessary; and professional advisers, insurers, auditors or legal representatives.

We do not need consent to share information where another lawful basis applies, including where sharing is necessary for safeguarding, child protection, legal duties or public tasks.

### **2.6 National Pupil Database and statutory data collections**

The school is required to provide information about pupils to the Department for Education through statutory data collections. The DfE may hold this information in the National Pupil Database and use or share it for education, research, statistics, policy and other lawful purposes. Further information about how the DfE uses pupil data is available on GOV.UK.

### **2.7 Children's rights and access to records**

Personal data belongs to the child. A parent or carer does not automatically exercise all data-protection rights on a child's behalf. We consider the child's age, understanding and best interests when responding to requests involving a child's personal data. Parents also have separate rights to access their child's educational record under education law. These rights are not identical to a subject access request under data-protection law.

## **3. Privacy notice for the school workforce**

### **3.1 Information we collect**

We may process name, address, contact details, date of birth and emergency contacts; payroll, tax, pension and banking information; employment history, contracts, working patterns and salary information; qualifications, training, professional registration and development records; recruitment, references, identity, right-to-work and safer-recruitment checks; DBS and other criminal-record information where lawful and necessary; attendance, absence, leave, sickness and occupational-health information; performance, appraisal, capability, disciplinary and grievance records; safeguarding, allegations and low-level concerns records where applicable; equality monitoring information; photographs, video, CCTV and system-access records where relevant; and communications and records created in the course of employment.

### **3.2 Why we use workforce information**

We use workforce information to recruit and employ staff, pay salaries and pensions, manage attendance and performance, provide training, fulfil safeguarding and health-and-safety duties, maintain the single central record and workforce census, protect the school's systems and



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property, plan staffing and comply with employment, education, tax, pension and other legal obligations.

### **3.3 Lawful bases and special category information**

We normally rely on contract, legal obligation, public task and, where appropriate, legitimate interests for activities that are not part of our public functions. For health, equality, trade-union and other special category data we also rely on the relevant employment, social protection, substantial public interest, health or legal-claims conditions. Consent is used only where appropriate and genuinely freely given.

### **3.4 Sources and recipients**

Information may come from the individual, referees, previous employers, recruitment agencies, professional bodies, the Disclosure and Barring Service, local authority, occupational-health services, payroll and pension providers, government bodies and other lawful sources. We may share workforce information with Surrey County Council, the Department for Education, HMRC, Teachers' Pensions or other pension providers, payroll providers, occupational health, insurers, professional bodies, safeguarding and law-enforcement agencies, auditors, legal advisers and approved contractors where necessary and lawful.

## **4. Privacy notice for job applicants**

We may collect contact details, application forms, employment history, qualifications, references, identity and right-to-work evidence, safer-recruitment and DBS information, interview notes, equality-monitoring information and any information needed to make reasonable adjustments.

We use this information to administer recruitment, assess suitability, carry out safeguarding and pre-employment checks, communicate with applicants and meet legal obligations. Our lawful bases normally include steps before entering a contract, legal obligation, public task and relevant employment or substantial-public-interest conditions for special category or criminal offence data.

Information may come from the applicant, referees, previous employers, recruitment agencies, the Disclosure and Barring Service, professional bodies and publicly available professional information where lawful and relevant. We normally retain unsuccessful recruitment information only for the period required by the school's retention schedule and to manage any recruitment-related query or claim. Successful applicants' relevant records become part of their workforce record.

## **5. Privacy notice for governors and volunteers**

We may process names, contact details, role and appointment information, attendance, training, skills information, declarations of interest, safeguarding and identity checks, DBS information where required, photographs and records of governor or volunteer activity.

We use this information to manage governance and volunteering, meet safeguarding and statutory duties, maintain appropriate records, communicate about school business and demonstrate effective governance. Lawful bases normally include legal obligation, public task and relevant substantial-public-interest conditions. Information may be shared with the local authority, Diocese, Department for Education, governance support services, safeguarding agencies, auditors and other bodies where necessary and lawful.

## **6. Privacy notice for visitors, contractors and people on site**



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We may collect names, organisation, contact details, visit dates and times, purpose of visit, vehicle details where relevant, identity or DBS evidence where required, visitor badge or sign-in records, CCTV images and records relating to safeguarding, health and safety or incidents.

We use this information to control access to the site, protect pupils and staff, meet safeguarding and health-and-safety responsibilities, investigate incidents and maintain site security. Visitors are normally signed in through the school's visitor-management system. Information may be shared with safeguarding or law-enforcement agencies, insurers, professional advisers and relevant contractors where necessary and lawful.

The school uses CCTV in accordance with its CCTV Code of Practice. CCTV is not used as a substitute for normal safeguarding supervision and is not used for parking enforcement on the public highway.

### **7. Privacy notice for suppliers and professional contacts**

We may process names, work contact details, organisation and job role, contracts, orders, invoices, bank or payment details, tax information and communications. We use this information to procure and manage goods and services, process payments, manage contracts, maintain audit trails and meet financial, legal and public-sector accountability duties. Lawful bases may include contract, legal obligation, public task and legitimate interests where appropriate.

Information may be shared with banks, payment providers, Surrey County Council, auditors, HMRC, insurers, professional advisers and other organisations where needed to administer the contract or meet legal requirements.

### **8. Retention and disposal**

We keep personal data only for as long as necessary for the purpose for which it was collected and in accordance with the school's records-retention schedule, legal requirements and any relevant safeguarding or litigation hold.

When information is no longer required, it is securely deleted, destroyed or anonymised. Different categories of information have different retention periods; a copy of the relevant retention information can be requested from the Data Protection Officer.

### **9. Security**

We use appropriate technical and organisational measures to protect personal information. These include access controls, managed user accounts and devices, multi-factor authentication where appropriate, secure storage, staff training, encryption where appropriate, backups and contractual safeguards with processors.

Staff must use approved school systems for school information and must report suspected data breaches promptly in accordance with the Data Protection and UK GDPR Policy.

### **10. International transfers**

Some approved service providers may process or store personal data outside the United Kingdom. Where this happens, the school will ensure that a lawful transfer mechanism and appropriate safeguards are in place, such as UK adequacy regulations, the UK International Data Transfer Agreement or an approved UK Addendum, as applicable.

### **11. Automated decision-making and profiling**



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The school does not routinely make significant decisions about pupils, parents, staff or applicants solely by automated means. If we introduce processing involving solely automated significant decisions, we will assess the legal basis, safeguards and transparency requirements before doing so and update the relevant privacy information.

### 12. Your data-protection rights

Depending on the circumstances and lawful basis, individuals may have rights to be informed about how their personal data is used; access their personal data; have inaccurate or incomplete data corrected; request erasure in certain circumstances; request restriction of processing in certain circumstances; object to certain processing; receive and transfer certain data in a portable format; withdraw consent where consent is the lawful basis; and receive safeguards in relation to certain automated decisions.

These rights are not absolute. For example, the school may need to retain or continue processing information to meet a legal duty, safeguard a child or perform a public task.

A subject access request may be made in any form. The school may ask for information reasonably needed to confirm identity or clarify the information being requested. We will respond within the statutory timescale and may extend that period where the law permits for complex or numerous requests.

### 13. Data-protection complaints

If you are concerned about how the school has handled personal information, please contact the Data Protection Officer first:

Helen Holdaway  
School Business Manager / Data Protection Officer  
St Paul's CofE Primary School & Nursery  
The Cardinals, Tongham, Farnham GU10 1EF  
Email: [sbm@stpaulstongham.com](mailto:sbm@stpaulstongham.com)  
Telephone: 01252 400222

The school will acknowledge a data-protection complaint within 30 days and will investigate and respond without undue delay. We will explain the outcome and keep an appropriate record of the complaint and how it was handled.

You also have the right to complain to the Information Commissioner's Office (ICO). The ICO recommends raising the matter with the organisation first where possible. Current contact and complaint information is available at [ico.org.uk](http://ico.org.uk).

### 14. Changes to these notices

We review these privacy notices at least annually and sooner where there is a significant change to law, guidance or the way the school processes personal information. Where a change materially affects individuals, we will take reasonable steps to bring the revised information to their attention.

#### Document Control

Policy owner: Data Protection Officer / School Business Manager

Approved by: Governing Body

Review cycle: Annual, or sooner following material legal or operational change



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