



Newlands CofE School Federation

A partnership of Shere and Clandon Schools

Privacy Notice

Use of children's data

1. Introduction

Under UK data protection law, individuals have a right to be informed about how our school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store, and use personal data about **pupils at our school**.

This privacy notice applies while we believe your child is not capable of understanding and exercising their own data protection rights.

Once your child can understand their rights over their own data (generally considered to be age 12, but this must be considered on a case-by-case basis), you should instead refer to our privacy notice for pupils to see what rights they have over their own personal data.

We, the Newlands CE Federation – a partnership of Shere and Clandon Schools, are the 'data controller' for the purposes of UK data protection law.

Shere CE Infant School and Fox Cubs Nursery Gomshall Lane, Shere, Surrey. GU59HB 01483 202198	Clandon CE Primary School The Street, West Clandon, Guildford, Surrey. GU4 7ST 01483 222442
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Our data protection officer is Kristy Goldsmith of Sapphire Data Protection (see contact details below).

2. The personal data we hold

Personal data that we may collect, use, store, and share (when appropriate) about your child includes, but is not restricted to:

- Personal identifiers and contacts, such as name, unique pupils' number, contact details and address.
- Characteristics, such as ethnicity, language, and free school meal eligibility.
- Safeguarding information, such as court orders and professional involvement.
- Medical and administration such as doctors' information, child health, dental health, allergies, medication, and dietary requirements.
- Attendance, such as sessions attended, number of absences, absence reasons and any previous schools attended.
- Assessment and attainment, such as key stage assessments, phonics assessment, times tables assessments.
- Behavioural information, such as exclusions and any relevant alternative provision put in place.
- Results of internal assessments and externally set tests.
- Pupil and curricular records
- Exclusion information
- Attendance information
- Safeguarding information
- Special educational needs such as details of any support received, including care packages, plans and support providers.

We may also collect, use, store, and share (when appropriate) information about your child that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Photographs and CCTV images captured in school.
- Information about characteristics, such as ethnic background or special educational needs

We may also hold data about your child that we have received from other organisations, including other schools and social services.

3. Why we use this data

We use the data listed above to:

- Support pupil learning.
- Monitor and report on pupil progress.
- Provide appropriate pastoral care.
- Protect pupil welfare.

- Assess the quality of our services.
- Administer admissions waiting lists.
- Carry out research.
- Comply with the law regarding data sharing.

3.1 Use of your child's personal data for marketing purposes

Where you have given us consent to do so, we may send your child marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to them.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

3.2 Use of your child's personal data in automated decision making and profiling

We do not currently process any pupils' personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices to explain the processing to you, including your right to object to it.

4. Our lawful basis for using this data

All data we process is in accordance with the rules as laid down in statute, including the General Data Protection Regulations, the Education Act 1996, the Education and Skills Act 2008 and the Apprenticeship, Skills, Children and Learning Act 2009 and Children Act 2014. We use data to:

- Comply with the law.
- Carry out a task in the public interest.
- Protect someone's interests.
- Communicate with you/parents/carers.

We use personal data about pupils and parents to ensure that we fulfil our legal obligation to offer educational opportunities to our pupils and can look after the needs and requirements of everyone in our learning community.

Where you have provided us with consent to use your child's data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

4.1 Our basis for using special category data:

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and 1 of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your child's personal data in a certain way.
- We need to perform or exercise an obligation or right in relation to employment, social security, or social protection law.

- We need to protect an individual's vital interests (i.e., protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent.
- The data concerned has already been made manifestly public by you.
- We need to process it for the establishment, exercise, or defence of legal claims.
- We need to process it for reasons of substantial public interest as defined in legislation.
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law.
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law.
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest.

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way.
- We need to protect an individual's vital interests (i.e., protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent.
- The data concerned has already been made manifestly public by you.
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise, or defence of legal rights.
- We need to process it for reasons of substantial public interest as defined in legislation.

5. Collecting this data

While most of the information we collect about your child is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about your child will come from you, but we may also hold data about your child from:

- Your child
- Local authorities

- Government departments or agencies
- Police forces, courts, or tribunals

6. How we store this data

We keep personal information about your child while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary. Our record retention schedule sets out how long we keep information about pupils.

We have put in place appropriate security measures to prevent your child's personal information from being accidentally lost, used, or accessed in an unauthorised way, altered, or disclosed.

We will dispose of your child's personal data securely when we no longer need it.

7. Who we share data with

We do not share information about your child with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required or necessary (and it complies with UK data protection law), we may share personal information about your child with:

- Our local authority, Surrey Country Council to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions and attendance.
- Government departments or agencies, to meet our legal obligations to share certain information with them, such as attendance and assessment data.
- Our regulator, Ofsted to meet our legal obligations to share certain information with it, such as safeguarding information.
- Police forces, courts, tribunals to meet our legal obligation to share certain information with them.

7.1 The National Pupil Database:

We are required to provide information about pupils to the Department of Education as part of statutory data collections such as the school census and the early years census.

Some of this information is then stored in the [National Pupil Database](#) (NPD), which is owned and managed by the Department for Education and provides evidence on school performance to inform research. The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The Department for Education may share information from the NPD with third parties, such as other organisations which promote children's education or wellbeing in England. These third parties must agree to strict terms and conditions about how they will use the data.

For more information, see the Department for Education's webpage on [how it collects and shares research data](#).

You can also [contact the Department for Education](#) with any further questions about the NPD.

7.2 Transferring data internationally

We may share personal information about your child with the following international third parties, where different data protection legislation applies:

- Other schools or educational establishments.
- App or cloud server providers.

We transfer this data on the basis of the adequacy regulation.

Where we transfer your child's personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

8. Your rights

8.1 How to access personal information that we hold about your child.

You have a right to make a 'subject access request' to gain access to personal information that we hold about your child.

If you make a subject access request, and if we do hold information about your child, we will (subject to any exemptions that apply):

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this.
- Give you a copy of the information in an intelligible form.

You may also have the right for your child's personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

Once your child can understand their rights over their own data (generally considered to be age 12, but this has to be considered on a case-by-case basis), we will need to obtain consent from your child for you to make a subject access request on their behalf.

8.2 Your right to access your child's educational record.

Parents, or those with parental responsibility, also have the right to access their child's educational record (which includes most information about a pupil). This right applies as long as the pupil is aged under 18.

There are certain circumstances in which this right can be denied, such as if releasing the information might cause serious harm to the physical or mental health of the pupil or another individual, or if it would mean releasing exam marks before they are officially announced.

To make a request, please contact the School Business Manager.

8.3 Your other rights regarding your child's data

Under UK data protection law, you have certain rights regarding how your child's personal data is used and kept safe. For example, you have the right to:

- Object to our use of your child's personal data
- Prevent your child's data being used to send direct marketing.
- Object to and challenge the use of your child's personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected.
- In certain circumstances, have the personal data we hold about your child deleted or destroyed, or restrict its processing.
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your child's personal data for a specific purpose.
- In certain circumstances, be notified of a data breach.
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations.

To exercise any of these rights, please contact us (see 'Contact us' below).

Once your child is able to understand their rights over their own data (generally considered to be age 12, but this has to be considered on a case-by-case basis), we will need to obtain consent from your child for you to make these requests on their behalf.

9. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>

- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

10. Contact us

Our data protection officer is:

Kristy Goldsmith of Sapphire Data Protection. kristy@sapphireconsulting.co.uk

However, our data protection lead has day-to-day responsibility for data protection issues in our school.

If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact them:

Kerry Jupp, School Business Manager. DPO@shere.surrey.sch.uk

12. Monitoring arrangements

The Governing Body first adopted this notice in September 2021. It will be reviewed annually as necessary.

The Resources Committee is responsible for the review of this notice.

Date of last review: Summer 2026

Date for next review: Summer 2027