

# June 2026

## Turvey Primary School

### Privacy Notice (How we use pupil information)

#### 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 as we believe your child is not capable of understanding and exercising their own data protection rights (this applies to children under the age of 12).

We, Turvey Primary School, are the 'data controller' for the purposes of UK data protection law.

#### The categories of pupil information that we process include:

- personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- characteristics (such as ethnicity, language, and free school meal eligibility)
- safeguarding information (such as court orders and professional involvement)
- special educational needs (including the needs and ranking)
- 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 phonics results, post 16 courses enrolled for and any relevant results)
- behavioural information (such as exclusions and any relevant alternative provision put in place)

#### Why we collect and use pupil information

We collect and use pupil information, for the following purposes:

- a) to support pupil learning
- b) to monitor and report on pupil attainment progress
- c) to provide appropriate pastoral care
- d) to assess the quality of our services
- e) to keep children safe (food allergies, or emergency contact details)
- f) to meet the statutory duties placed upon us for the Department for Education (DfE) data collections

Under the [UK General Data Protection Regulation \(UK GDPR\)](#), the lawful bases we rely on for processing pupil information are:

Purpose	Article 6 Basis	Article 9 Basis (if special category data is processed)
<b>a) To support pupil learning</b>	Public task – Article 6(1)(e): Necessary for the performance of a task carried out in the public interest.	Substantial public interest – Article 9(2)(g): Necessary for reasons of substantial public interest, such as educational support for pupils with special educational needs or disabilities. <a href="#">gov.uk+8assets.publishing.service.gov.uk+8gov.uk+8gov.uk+3gov.uk+3gov.uk+3</a>
<b>b) To monitor and report on pupil attainment progress</b>	Public task – Article 6(1)(e): Necessary for the performance of a task carried out in the public interest.	Substantial public interest – Article 9(2)(g): Necessary for reasons of substantial public interest, particularly when monitoring progress involves special category data.
<b>c) To provide appropriate pastoral care</b>	Public task – Article 6(1)(e): Necessary for the performance of a task carried out in the public interest.	Substantial public interest – Article 9(2)(g): Necessary for reasons of substantial public interest, such as safeguarding and welfare of children.
<b>d) To assess the quality of our services</b>	Public task – Article 6(1)(e): Necessary for the performance of a task carried out in the public interest.	Substantial public interest – Article 9(2)(g): Necessary for reasons of substantial public interest, especially when assessments involve special category data.
<b>e) To keep children safe (food allergies, or emergency contact details)</b>	Legal obligation – Article 6(1)(c): Necessary for compliance with a legal obligation.	Substantial public interest – Article 9(2)(g): Necessary for reasons of substantial public interest, such as safeguarding health and safety.
<b>f) To meet the statutory duties placed upon us for Department for Education (DfE) data collections</b>	Legal obligation – Article 6(1)(c): Necessary for compliance with a legal obligation.	Substantial public interest – Article 9(2)(g): Necessary for reasons of substantial public interest, including statutory data collection requirements

## Collecting pupil information

We collect pupil information via registration forms at the start of the school year or Common Transfer File (CTF) or secure file transfer from previous school

Pupil data is essential for the schools' operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, whether you are required to

provide certain pupil information to us or if you have a choice in this.

## Storing pupil data

We hold pupil data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please contact the school data protection officer (Mrs L Gibson).

## Who we share pupil information with

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- NHS
- School nursing team

## Why we regularly share pupil information

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

Recipient	Legal Basis (UK GDPR)	Statutory Legislation	Secure Transfer Method
Next schools	Art 6(1)(c) legal obligation	Education (Pupil Info) Regs 2005 (Common Transfer File) <a href="https://assets.publishing.service.gov.uk/gov.uk/7de47000-0000-4700-0000-000000000000/evon.gov.uk+7southampton.gov.uk+1chb.org.uk+1">assets.publishing.service.gov.uk+7gov.uk+7devon.gov.uk+7southampton.gov.uk+1chb.org.uk+1</a>	Secure MIS export/email, encrypted inter-school portal
Local Authority	Art 6(1)(c) legal obligation	Pupil Registration Regs 2006; Children Act 2004 Sections 10/11	Encrypted MIS uploads/ to LA portal
Department for Education (DfE)	Art 6(1)(c) legal obligation	Education (Info) Regs 2013; School Census requirements	Secure COLLECT portal; encrypted data uploads
NHS	Art 6(1)(e) public task	–	NHS secure email/portal, encrypted transfer
School Nursing Team	Art 6(1)(e) public task + Art 9(2)(h) (health data)	Working Together; Health Acts	Encrypted NHS/MIS transfer, secure email

For more information, please see ‘How Government uses your data’ section. For privacy information on the data the Department for Education collects and uses, please see:

<https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3>

## Requesting access to your personal data

The UK-GDPR gives parents and pupils certain rights about how their information is collected and used. To make a request for your personal information, or be given access to your child's educational record, contact our Data Protection Officer - Mrs L Gibson

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of your personal information we have about you – this is called 'right of access', this is also known as a subject access request (SAR), data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to [complain to the Information Commissioner](#) if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't haven't the right to object, but you have the right to withdraw consent.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at [raise a concern with ICO](#).

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

## 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 our Data Protection Officer - Mrs L Gibson

## 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 June 2025.

## Contact

If you would like to discuss anything in this privacy notice, please contact: Mrs L Gibson - Data Protection Officer.

## How Government uses your data

The pupil data that we lawfully share with the Department for Education (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, school GCSE results or 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 Department for Education (DfE) (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

## The National Pupil Database (NPD)

The NPD is owned and managed by the Department for Education (DfE) and contains information about pupils in schools in England. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

The data in the NPD is provided as part of the operation of the education system and is used for research and statistical purposes to improve, and promote, the education and well-being of children in England.

The evidence and data provide DfE, education providers, Parliament and the wider public with a clear picture of how the education and children's services sectors are working in order to better target, and evaluate, policy interventions to help ensure all children are kept safe from harm and receive the best possible education.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-mpd-privacy-notice/national-pupil-database-mpd-privacy-notice>

## Sharing by the Department for Education (DfE)

DfE will only share pupils' personal data where it is lawful, secure and ethical to do so. Where these conditions are met, the law allows the Department for Education (DfE) to share pupils' personal data with certain third parties, including:

- schools and 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 Department for Education's (DfE) NPD 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 the Department for Education (DfE) to request access to individual level information relevant to detecting that crime.

For information about which organisations the Department for Education (DfE) 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 the Department for Education (DfE) holds about you**

Under the terms of the UK GDPR, you are entitled to ask the Department for Education (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 Department for Education (DfE), you should make a 'subject access request'. Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at the address below:

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

or

<https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>