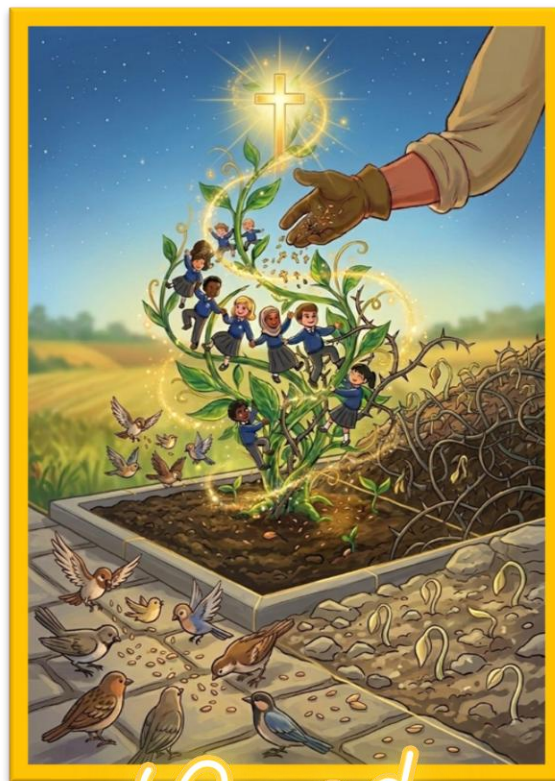




St. Peter's
Church of England Primary School

PRIVACY NOTICE



BE THE *Good* SOIL

Mark 4: 1-20

'In Jesus, we learn, love and grow together.'

Privacy Notice for Pupils, Parents and Carers

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St Peter's Church of England Primary School

Privacy Notice for Pupils and Parents and Carers

1. Purpose and who we are

This privacy notice explains how St Peter's Church of England Primary School collects, stores, uses and shares personal information about pupils. It is for pupils and their parents and carers. It also covers parent and carer contact information used to support their child. Separate notices cover other processing, such as staff, governors and recruitment.

Under data protection law, individuals have a right to understand how we use their personal information. We follow the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025.

St Peter's Church of England Primary School is the data controller. This means we determine the purposes of using pupil information and how we use it. Our address is Muriel Street, Rochdale OL16 5JQ. Telephone: 01706 648195. Email: office@stpetersce.rochdale.sch.uk.

Our Data Protection Officer (DPO) is contactable at DPOSchools@rochdale.gov.uk, or Information Governance Unit, Number One Riverside, Smith Street, Rochdale OL16 1XU. You also have a route to the DPO through the school office.

For pupils: we use information about you to teach you, look after you and keep you safe. We share it with people who need it for these purposes. Ask a trusted adult or the school office if you want to know more, see your information or tell us something is wrong. We explain your rights in words you understand.

2. The personal information we hold

We collect and use information relevant to a pupil's education, welfare and school life. This includes:

- ✚ Names, date of birth, pupil identifiers, address, contact details, contact preferences and identification documents where needed.
- ✚ Parent and carer names, contact details, parental responsibility, emergency contacts and relevant family circumstances.
- ✚ Admission applications, waiting lists, previous schools, pupil and curricular records, assessments, test results and progress information.
- ✚ Attendance and absence records, reasons for absence, behaviour, suspensions and permanent exclusions.
- ✚ Pupil characteristics, including ethnic background, language, religion where relevant, free school meal eligibility and special educational needs or disabilities.
- ✚ Physical and mental health information, allergies, medication, healthcare plans and accessibility requirements.
- ✚ Safeguarding concerns, referrals, relevant correspondence and information about care, support plans and support providers.
- ✚ School trips, visits, activities and related consent and emergency arrangements.
- ✚ Photographs and images used for school purposes. CCTV images where the school operates CCTV, with information about its purpose displayed at the relevant locations.
- ✚ Information generated through approved learning, communication and school administration systems, including account details and relevant usage or security records.

Health, ethnicity and religious belief are examples of special category information with extra legal protection. Some safeguarding records also contain criminal offence information. We apply the additional legal conditions and safeguards required for the information involved.

3. Where information comes from

We receive information from pupils and their parents and carers through admissions, forms, conversations and correspondence. Staff create records through teaching, assessment, attendance, pastoral care and safeguarding work.

We also receive relevant information from previous schools and early years settings, Rochdale Borough Council and other local authorities, the Department for Education (DfE), health professionals, social care, police and other agencies supporting or protecting children. We explain the source of information on request, subject to lawful restrictions.

4. Why we use information and our lawful bases

We use information to support learning, monitor and report on progress, provide pastoral care, protect welfare, manage admissions and school activities, assess services and meet legal reporting duties. We only process information where we have a lawful basis. The main bases are:

- ✚ Legal obligation, Article 6(1)(c) UK GDPR: statutory attendance and admission records, required education reporting, school census returns and other duties imposed by law.
- ✚ Public task, Article 6(1)(e): providing education, assessing learning, supporting SEND, providing pastoral care and carrying out safeguarding and school administration functions grounded in law.
- ✚ Consent, Article 6(1)(a): optional uses for which we ask permission, such as publishing a pupil's photograph for promotional purposes. We explain the use when asking.
- ✚ Vital interests, Article 6(1)(d): necessary action to protect someone's life where another basis is unsuitable.

Relevant laws include the Education Act 1996, Education Act 2002, Children and Families Act 2014, Equality Act 2010 and regulations governing pupil information, registration and school data collections. A legal requirement or public task applies only to information necessary for the relevant duty or function.

For special category information, we also need an Article 9 condition. Statutory education, equality and safeguarding functions commonly rely on substantial public interest under Article 9(2)(g), with the relevant Schedule 1 condition under the Data Protection Act 2018, including statutory functions or safeguarding children. Explicit consent under Article 9(2)(a) applies to optional sensitive processing where consent is appropriate. We identify the condition for each activity and maintain an appropriate policy document where required.

For criminal offence information, we apply Article 10 and the relevant authorisation or Data Protection Act 2018 condition. A general school purpose alone does not authorise sensitive processing.

Research and service evaluation use anonymous information wherever suitable. Any identifiable research requires a defined lawful purpose, appropriate safeguards and additional information for the individuals involved. We do not use consent as a substitute for a statutory duty.

Where processing relies on consent, you have the right to withdraw it at any time by contacting the school office. Withdrawal is as straightforward as giving consent. It does not affect earlier lawful use or processing required on another lawful basis. We explain practical effects, including stopping future optional publication.

5. Providing information to us

Most information needed for education and statutory duties is required. Some information is optional. When collecting it, we explain which applies and the consequences of not providing required information, such as difficulty arranging safe support or deciding eligibility for a service.

Please tell the school office promptly about changes to addresses, contact details, parental responsibility, health needs and other information affecting your child's support or safety.

6. Security and how long we keep information

We store records securely in approved paper and electronic systems. Access is limited to people who need information for their responsibilities. We use appropriate access controls, secure transfer methods and contractual safeguards for service providers.

We keep pupil information during attendance and retain particular records afterwards where necessary. Retention depends on the record's purpose, statutory requirements, safeguarding needs, transfer to the next school, complaints or legal claims. We do not apply one retention period to every record.

Our retention schedule sets periods by record type. For pupil and education records, we consider continuing educational needs, transfer requirements and any remaining legal duties. For safeguarding and healthcare records, we consider safeguarding obligations, the child's needs and lawful longer-term retention. For images and optional publications, we consider the stated use, consent and continued need. For administrative, financial and admissions records, we consider the relevant duty and accountability requirements.

Records are reviewed at the end of their retention period and securely deleted or anonymised unless a justified legal, safeguarding or complaint-related hold requires longer retention. Request the relevant retention period or schedule from the school office or DPO. The Information and Records Management Society's school guidance informs the schedule and does not itself set a universal statutory deadline.

7. Who we share information with

We share relevant information where there is a lawful basis and an appropriate purpose. Consent is not required for every disclosure, including necessary statutory reporting or safeguarding. We limit sharing to the information needed and consider confidentiality and the rights of others.

Recipients, depending on the purpose, include:

- ✚ Rochdale Borough Council and other relevant local authorities for admissions, attendance, SEND, funding, education and safeguarding duties.
- ✚ DfE, assessment bodies and authorised education services for statutory returns, assessments and education administration.
- ✚ A pupil's receiving school or setting and professionals supporting learning and transition.
- ✚ Parents, carers and authorised representatives, subject to parental responsibility, the child's rights, court orders and safeguarding considerations.
- ✚ Health services, social care, support agencies, charities and voluntary organisations involved in a child's care or welfare.
- ✚ Ofsted, SIAMS and authorised inspectors, auditors and regulators undertaking their functions.
- ✚ Suppliers providing approved administration, safeguarding, learning, communications, security, trips or financial services. Processors act under contracts and school instructions.
- ✚ Police, courts, tribunals, government bodies and professional advisers where necessary and lawful.

Organisations acting as separate controllers explain their own processing in their privacy notices. Contact the school office for information about relevant recipients and providers. New uses requiring additional privacy information are explained before they begin.

8. DfE collections and the National Pupil Database

We provide required pupil information to DfE through statutory returns, including the school census and relevant early years and assessment collections. This includes identifiers, pupil characteristics, attendance, SEND, eligibility and attainment information where required by the collection.

Required pupil-level daily attendance information is also shared through the national attendance collection. DfE's separate attendance privacy notice explains its use.

DfE controls the National Pupil Database (NPD), linking statutory collection information with attainment data. Its privacy notice explains its purposes, lawful bases, retention, controlled sharing and how to exercise rights over information it holds. A request to the school concerns school-held information. A request about DfE-held information goes to DfE.

DfE privacy information and contact routes are available through the links at the end of this notice. Statutory sharing does not depend on parental consent.

9. International transfers and automated processing

Where an approved provider involves a restricted transfer of personal information outside the UK, we comply with the UK GDPR transfer rules. Protection uses applicable UK adequacy regulations, appropriate safeguards such as the UK International Data Transfer Agreement or Addendum with the required assessment, or a lawful exception where applicable.

Contact the DPO for information about transfers relevant to your child, the destination and the safeguards, including how to obtain a copy where applicable. We provide additional privacy information where a particular service requires it.

Digital systems support school administration and learning. If an activity involves significant decisions based solely on automated processing, including profiling, we provide specific information about its operation, effects and applicable rights, including routes for human review and challenge. The use of a digital system alone does not mean a decision is solely automated.

10. Access to information

A subject access request seeks personal information and details of how we use it. Requests are accepted verbally or in writing. No special form or legal wording is required. Contact the school office or DPO. We check identity and authority where necessary and explain any lawful limit on disclosure.

We respond without undue delay, normally within one month. A further two months is permitted for complex or multiple requests where the law allows, with reasons given within the initial month. The law also allows time for necessary identity checks and a pause for clarification reasonably needed to identify requested information. We explain any change to the deadline. School holidays do not automatically extend it.

Subject access is normally free. A fee or refusal is limited to circumstances permitted by law. We provide the personal information and relevant details of its use, sources, sharing, retention and rights, subject to applicable exemptions.

These rights belong to the child. A parent acts on their behalf where the child lacks sufficient understanding or authorises the parent. We assess understanding, maturity, wishes and best interests individually. There is no fixed age threshold for competence in England.

Parents also have a separate right to access their child's educational record under the Education (Pupil Information) (England) Regulations 2005. Written requests go to the school office. The deadline is 15 school days, subject to the statutory restrictions. This route differs from subject access and does not

extend to all personal information. Inspection is free. A permitted copying charge is limited to the cost of supply.

11. Your right to object

You have a right to object to processing based on public task on grounds relating to your particular situation. Contact the school office or DPO and explain the processing and your reasons. We assess the objection and explain whether overriding grounds or legal claims justify continued processing. This right is not limited to information causing damage or distress.

You have an absolute right to object to processing for direct marketing. An objection to one use does not automatically stop separate processing required by law.

12. Other rights

Depending on the processing and lawful basis, you have rights to:

- ✚ Ask for inaccurate information to be corrected and incomplete information completed.
- ✚ Ask for erasure where the legal conditions apply. This does not require deletion of records we must lawfully retain.
- ✚ Request restriction of processing in the circumstances set out in law.
- ✚ Receive and transfer information under data portability rules where automated processing relies on consent or a contract. This generally does not apply to statutory education records.
- ✚ Withdraw consent for processing based on consent.
- ✚ Exercise applicable safeguards for significant solely automated decisions, including human involvement and challenge.
- ✚ Complain to the regulator and seek a legal remedy, including compensation where the legal requirements are met.

Send rights requests to the school office or DPO. We explain which rights apply, any lawful restrictions, our decision and the routes for challenge. We support pupils and families with accessible communication.

13. Complaints and contact

If you are concerned about how we use information, contact the school office or DPO using the details in section 1. Explain the concern and the outcome you seek. We accept complaints in writing or verbally and offer help with communication where needed.

We acknowledge data protection complaints within 30 days of receipt. We make appropriate enquiries, keep you informed and explain the outcome without undue delay. A complaint does not replace a rights request or its separate statutory deadline.

You have the right to complain to the Information Commissioner's Office (ICO). Its guidance asks you to raise the matter with the organisation first. For advice or to complain, visit <https://ico.org.uk/make-a-complaint/> or telephone 0303 123 1113. Postal address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

For questions about this notice, contact office@stpetersce.rochdale.sch.uk. We provide accessible formats and help explaining the notice on request.

14. Review and further information

We review this notice annually and whenever our use of information or relevant requirements change. We publish the current version and provide additional information for new purposes where required. This notice should be read alongside relevant service notices and the school's data protection, retention, safeguarding, SEND and complaints arrangements.

Guidance and privacy information

DfE model privacy notices

<https://www.gov.uk/government/publications/data-protection-and-privacy-privacy-notices>

DfE data protection in schools

<https://www.gov.uk/guidance/data-protection-in-schools>

DfE National Pupil Database privacy notice

<https://www.gov.uk/government/publications/national-pupil-database-npd-privacy-notice>

DfE school attendance collection privacy notice

<https://www.gov.uk/government/publications/privacy-notice-school-attendance-data-collection>

ICO information rights

<https://ico.org.uk/for-the-public/>

ICO data protection complaint guidance

<https://ico.org.uk/for-the-public/how-to-make-a-data-protection-complaint/>