Pupil and parent carer privacy notice

Updated September 2026 | Version 2.0 | England

This notice explains how we use personal information about pupils, parents, carers and emergency contacts, why we need it, who we share it with and the rights you have. You do not need to sign or consent to this privacy notice. Optional publicity choices are provided separately at the end.

Who is responsible for your information

School: **Oldfield Brow Primary School**. The data controller, which decides how and why personal information is used, is the **Governing Body of Oldfield Brow Primary School**.

Controller contact: **Oldfield Brow Primary School, Taylor Road, Altrincham, WA14 4LE**. Where another organisation controls particular records, we explain its role when relevant.

Our Data Protection Officer service is provided by Global Policing Limited. Email: data@globalpolicing.co.uk. Telephone: 0161 510 2999 (answerphone). Website: www.globalpolicing.co.uk/data. You may contact the school or the DPO about this notice or your rights.

We follow the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as amended, including by the Data (Use and Access) Act 2025.

Information we collect and where it comes from

We collect information from you and your child, previous schools, local authorities, education and health professionals, and safeguarding agencies. We also create records during education and school activities. Information may include:

- Names, dates of birth, addresses, contact details, pupil identifiers, parental responsibility, emergency contacts and relevant family circumstances.
- Admissions, attendance and absence reasons, attainment, assessments, behaviour, exclusions, school transfers, trips and support provided.
- Special educational needs and disabilities, health and allergy information, care plans, safeguarding concerns and referrals; ethnicity, religion or other characteristics where relevant and lawful.
- Parent and carer communications, complaints, payment and funding eligibility information, including free school meal eligibility; photographs and system-use records where applicable.

Why we use information and our lawful bases

We use information to provide education, support learning and wellbeing, manage attendance and behaviour, protect children, communicate with families, administer services and funding, and meet reporting and record-keeping duties. We use the minimum information needed for each purpose.

Education and school administration

For a maintained school or academy, delivering education and associated pastoral and administrative functions normally relies on public task under Article 6(1)(e). Compliance with a specific statutory duty relies on legal obligation under Article 6(1)(c). These bases cover necessary processing rather than an unrestricted right to use information.

Applicable education duties may include the Education Act 1996 and the Education (Information About Individual Pupils) (England) Regulations 2013, as amended, for relevant pupil information returns. **Oldfield Brow Primary School is a maintained school. Personal data is processed primarily under Article 6(1)(e) UK GDPR (public task) and Article 6(1)(c) UK GDPR (legal obligation) to fulfil our statutory duties relating to education, safeguarding, attendance monitoring, special educational needs provision, admissions, exclusions and educational records.**

Health safeguarding and other sensitive information

We process special category personal data where necessary to support pupils' education, welfare and safety. For special educational needs and disabilities (SEND) provision, safeguarding activities, equality monitoring and the exercise of statutory educational functions, we rely on Article 9(2)(g) UK GDPR (substantial public interest), together with the relevant conditions in Schedule 1 of the Data Protection Act 2018, including paragraph 6 (statutory and government purposes) and paragraph 18 (safeguarding of children and individuals at risk), where applicable.

Where we process health information to provide medical care, administer medication, implement healthcare plans, support pupils with medical conditions or respond to emergencies, we rely on Article 9(2)(h) UK GDPR (health or social care purposes), together with Schedule 1, paragraph 2 of the Data Protection Act 2018. In emergency situations, we may also rely upon Article 9(2)(c) UK GDPR where necessary to protect an individual's vital interests.

We maintain an appropriate policy document where required by law and ensure that access to special category information is limited to those who need it to carry out their duties. Criminal offence information is processed only where Article 10 UK GDPR and the relevant provisions of the Data Protection Act 2018 permit it.

Criminal offence information is handled only where Article 10 and the applicable domestic-law authorisation permit it.

In a genuine emergency we may rely on vital interests under Article 6(1)(d). For special category information, Article 9(2)(c) also requires that the person is physically or legally incapable of consenting. Routine health support is not automatically treated as an emergency.

Optional uses and required information

We seek freely given, specific consent under Article 6(1)(a) for optional publicity uses where appropriate. Essential education, necessary safeguarding, lawful school transfers and statutory returns do not depend on signing the optional form. We identify our lawful basis before using information.

When requesting information we explain whether it is required by law, needed to provide a service or optional, and the consequences of not providing it. Missing essential details may prevent us from arranging a requested service or suitable support. Please tell the school when your details change.

Sharing protecting and retaining information

We share relevant information only where necessary and lawful. Depending on the purpose, recipients include receiving schools and colleges, Trafford Metropolitan Borough Council, the Department for Education (DfE), examination bodies, health professionals, NHS services, safeguarding partners, social care, police, courts and providers supporting school services. Further information about Trafford Council's processing of personal data can be found in its privacy notice.

School suppliers may support management information, learning platforms, IT, communications, payments and trips. When acting as our processors, they must follow our documented instructions and contractual security obligations; individual parental permission is not automatically required for their necessary work. Other recipients may be independent controllers with their own privacy notices.

We share statutory pupil information with the DfE where the relevant duties apply. The DfE is responsible for its own processing and explains its uses and further sharing at https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter. This includes information about the National Pupil Database. The categories of information shared with the DfE may include pupil census data, personal identifiers, attendance information, exclusions and suspensions data, assessment and attainment information, special educational needs and disabilities (SEND) information, free school meal eligibility, and information about a pupil's educational setting and characteristics where required by law.

This school is a primary school and does not routinely provide pupil information to youth support services under the post-13 participation arrangements. Accordingly, the statutory information-sharing arrangements relating to youth support services and the additional rights that apply from age 16 do not normally apply.

Security and school technology

Access is limited to people who need information for their work. We use appropriate organisational and technical safeguards and verify identity and authority before releasing personal information. Medical care information is shared only with those who need it; optional publicity consent does not authorise unrestricted display of medical details.

Access to personal information is limited to staff and authorised individuals who require it for their work. We use appropriate organisational and technical security measures to protect personal information and verify identity and authority before releasing information.

The school operates CCTV systems in and around the premises for safeguarding, health and safety, crime prevention and the protection of pupils, staff, visitors and property. CCTV footage may be viewed by authorised members of staff and shared with law enforcement agencies where lawful and necessary. Recordings are retained in accordance with the school's retention schedule unless required for an ongoing investigation.

The school uses internet filtering and monitoring systems on school networks and devices to help safeguard pupils, comply with statutory safeguarding responsibilities and protect school systems from misuse. Information generated through these systems may be reviewed by authorised staff where necessary to investigate safeguarding concerns, breaches of school policies or security incidents.

The school does not currently use biometric recognition systems, such as fingerprint or facial recognition technology, for pupils. Should this change, separate information and consent arrangements will be implemented where required by law.

The school may use artificial intelligence (AI) enabled technologies to support administrative functions, curriculum planning, document drafting, data analysis and operational efficiency. AI tools are used with appropriate human oversight and are not used to make solely automated decisions that have legal or similarly significant effects on pupils, parents, carers or staff.

Further information about specific technologies used by the school is available on request.

International transfers: **Some of the school's service providers may process or permit access to personal information outside the United Kingdom. Where personal information is transferred internationally, appropriate safeguards will be implemented in accordance with UK GDPR requirements, including adequacy regulations, the UK International Data Transfer Agreement (IDTA), or other approved contractual safeguards.**

The school undertakes due diligence on suppliers and seeks to ensure that personal information receives an equivalent level of protection wherever it is processed. Further information about international transfers and the safeguards applied can be obtained from the school or the Data Protection Officer upon request

How long we keep information

We apply different retention periods to different records. Our retention schedule is available at **The school's retention schedule is available upon request from the school office or Data Protection Officer. Retention periods are based on statutory requirements, safeguarding guidance, operational need and limitation periods for legal claims.**

It sets out the periods or criteria for pupil and parent records, safeguarding, attendance, finance, images and system logs. We consider legal duties, safeguarding needs, transfers and the time reasonably needed to handle complaints or legal claims. Records subject to a lawful preservation requirement are retained until it ends.

Primary pupil records normally transfer to the next school; secondary pupil records are generally retained to the pupil's 25th birthday. Safeguarding records may need longer retention, including child sexual abuse records under current guidance. There is no blanket promise to erase all information at age 25 or all parent information when a child leaves. We securely destroy or anonymise records when no longer needed.

Your rights and how to contact us

You can ask for access to your personal information and correction of inaccurate or incomplete information. Depending on the lawful basis and circumstances, you may also ask for erasure, restriction of use or a portable copy, or object to processing. These rights have conditions and exceptions; for example, we may need to retain records to meet a legal duty.

Where we rely on consent, you can withdraw it at any time without affecting the lawfulness of earlier use. Where we rely on public task or legitimate interests, you may object on grounds relating to your circumstances. You can object to direct marketing at any time.

Contact the school or our DPO to exercise your rights. Requests can be made verbally or in writing and do not have to use a particular form. We may need proportionate evidence of identity or authority to protect your information. We normally respond to a subject access request within one calendar month. Where the law allows clarification, an extension or an exemption, we will explain how this affects your request. School holidays do not automatically extend the deadline.

Personal information rights belong to the child as well as to parents in relation to their own information. A parent may act for a child where the child is not competent to act for themselves, or with the competent child's authority. We consider the child's understanding, wishes and interests before disclosing their information.

A parent's separate right to request an educational record depends on the school type and applicable education regulations. Where this statutory right applies, the response period is 15 school days. This is different from a UK GDPR subject access request.

Automated decisions

The school does not make decisions about pupils, parents or carers solely through automated processing that produce legal effects or similarly significant impacts. All significant decisions are reviewed and made by appropriately authorised staff.

Questions and complaints

If you are concerned about our use of personal information, contact the school or Global Policing Limited using the details on the first page. **A copy of the school's Data Protection Complaints Procedure is available from the school office or via the school website. Individuals are encouraged to raise concerns with the school in the first instance so that issues can be resolved promptly and fairly.** We will acknowledge a data protection complaint within 30 days, investigate appropriately, keep you informed and provide an outcome without undue delay.

You also have the right to complain to the Information Commissioner's Office (ICO). Visit https://ico.org.uk/make-a-complaint/ or call 0303 123 1113. The ICO normally expects you to give the organisation an opportunity to address your concern first.

Keeping this notice up to date

We review this notice regularly and when our use of information changes. We will bring material changes to your attention. Current notice: **available on the school's website or from the school office on request.** Next scheduled review: September 2027, or sooner if needed. Ask the school for an accessible format or help understanding this notice.

Optional photographs and publicity consent

School: **Oldfield Brow Primary School**. This form records optional choices only. Refusing or withdrawing consent will not affect your child's education or access to school services.

Pupil name: _____ Class: _____

Parent or carer name: _____

Relationship to pupil: _____

Select Yes or No for each purpose. Leaving a choice blank means no consent for that purpose. Photographs may include video images. We will seek a separate choice for any materially different use. This form does not authorise facial recognition or biometric identification.

Use images in optional celebration displays inside the school, without a name. Yes ☐ No ☐

Add my child's first name to those internal celebration displays. Yes ☐ No ☐

Publish images on the school's public website, without a name. Yes ☐ No ☐

Add my child's first name to those website images. Yes ☐ No ☐

Publish images on the school's official social media accounts, without a name. Yes ☐ No ☐

Add my child's first name to those social media images. Yes ☐ No ☐

Use images in printed school prospectuses or publicity leaflets, without a name. Yes ☐ No ☐

Official social media accounts covered: **Oldfield Brow Primary School Facebook Page**. Period covered: **September 2026-September 2027**. Online publication and printed-stock retention: **Online publication and printed-stock retention: Images published on the school website or official social media platforms may remain available for up to five years unless consent is withdrawn earlier or there is another lawful reason requiring their removal. Printed materials may continue to be distributed until existing stocks have been exhausted. Evidence of consent and any subsequent withdrawal will be retained in accordance with the school's retention schedule.**

We will ask separately before providing identifiable images or names to newspapers or other external publishers.

Public images can be viewed, copied or shared by others, including outside the UK. We control our own publications but cannot guarantee removal of copies made by others. To withdraw or change a choice, contact **office@oldfield-brow.com or 0161 926 8646**. We will stop future consent-based use and remove images from channels we control where reasonably possible; already distributed printed material may not be recoverable.

I confirm that I have parental responsibility or appropriate authority to make these choices. The school will take account of the child's views and ability to understand and make their own decisions. Permission to publish a name applies only where permission for the associated image has also been given.

Signature: _____ Date: _____

We retain evidence of your choices and any withdrawal in accordance with our retention schedule, for as long as necessary to manage and demonstrate those choices.