



Privacy Notice for Greatstone Primary School & Nursery

Greatstone Primary School collects, uses and is responsible for certain personal information about pupils and their families. We are a data controller for the purposes of the UK GDPR and the Data Protection Act 2018.

Our Data Protection Officer (DPO)

Our DPO is: Satwana - admin@satswana.com

Personal information we collect;

We collect information you provide and information created by the school while delivering education and safeguarding. Examples include:

- Pupil identifiers and contact details (name, date of birth, UPN, address, parent/carer contact details).
- Characteristics (ethnicity, language, country of birth, free school meals eligibility).
- Special educational needs and relevant medical information (special-category data).
- Attendance records and absence reasons.
- Assessment and attainment information (including national curriculum assessments).
- Safeguarding records and welfare information.
- Photographs and images (see below for lawful basis).

We may also receive information from other organisations such as previous schools, local authority teams, health providers and the Department for Education (DfE).

Why we use personal information and the lawful basis;

We process personal data to run the school, provide education, safeguard pupils and meet our legal obligations. The lawful bases we rely on include:

- Public task / official authority: to deliver education, monitor pupil progress, administer assessments and provide pastoral care. (UK GDPR — Article 6(1)(e).)
- Legal obligation: to comply with statutory duties such as the school census, safeguarding reporting, and attendance returns. (UK GDPR — Article 6(1)(c).)
- Substantial public interest (DPA 2018): when processing special-category data (for example, SEND records, health and safeguarding), we rely on the relevant substantial public interest conditions in the DPA 2018 (for example those that permit safeguarding, public health and equality of opportunity). We will state specific legal bases on request. (DPA 2018.)

Consent: we will seek consent for processing where the law requires it — for example, for publishing photographs in some printed materials or certain non-essential activities.

Consent is optional and may be withdrawn; withdrawal does not affect processing done before consent was withdrawn. (Note: many school activities do not use consent as the lawful basis.) (DPA 2018 / PECR where applicable.)

Where we believe another lawful basis may apply (for example recognised legitimate interest routes introduced by recent legislation), we will only use those after checking the ICO guidance and recording a lawful-basis assessment. If you would like a copy of the lawful-basis assessment for any processing activity, contact the DPO. (ico.org.uk)

How we use special-category (sensitive) data;

When we process special-category data (e.g. health, ethnicity, SEN), we do so only when necessary and when the law permits — usually for safeguarding, to provide education or to meet our statutory duties. We follow DfE and ICO guidance when doing so. (gov.uk)

When we share personal information;

We share personal data where it is necessary for education, safeguarding or to comply with the law. Typical recipients include:

- The Department for Education (DfE) — statutory collections such as the school census and the National Pupil Database (NPD). The DfE is the data controller for these collections and has its own privacy notices explaining use of the NPD. (gov.uk)
- Kent County Council teams (SEND, Early Help, admissions and other local authority services).
- NHS and health professionals where needed to support a child's health and wellbeing.
- Commissioned service providers (e.g. learning platforms, school apps, catering, safeguarding services) that process data on our behalf under contract.
- External moderators and awarding bodies for assessments.
- Police or other agencies where required by law or for child protection.

We will not normally share personal data outside the UK, and where it is necessary we will ensure appropriate safeguards are in place.

The National Pupil Database (NPD);

We are required to provide certain information to the DfE which may be stored in the NPD. The DfE may share information from the NPD with third parties for research, statistics and policy development under strict controls — see the DfE NPD privacy notice for detail. (gov.uk)

How long we keep information;

We will retain pupil personal data in line with statutory guidance and local retention schedules. As a general rule, we retain pupil records until the pupil reaches age 25, but some records (for example: safeguarding files, SEND documentation, records required by statute or for legal reasons) may be retained for a longer period in accordance with DfE/LA guidance. If you need specific retention periods for a particular record, contact the DPO. (gov.uk)

Your rights;

Under the UK GDPR you have rights, subject to certain exemptions, including:

- The right to be informed (this notice).
- The right of access (subject access request).
- The right to rectification.
- The right to erasure in some circumstances.
- The right to restriction of processing.
- The right to data portability (where applicable).
- The right to object to processing (where applicable).
- Rights in relation to automated decision making and profiling (rare in a school context).

For further information about your rights, or to exercise them, contact the DPO (see above).

You also have the right to complain to the Information Commissioner's Office (ICO):

ico.org.uk/concerns. (ico.org.uk)

Consent, photographs and marketing

- Photographs and videos: we will set out clearly where we rely on consent (for example some published materials and marketing uses). For many internal uses (identification, safeguarding, class activities) processing will be lawful under public task or substantial public interest rather than consent. Please check the consent/photograph form we issue and update your preferences as required. (gov.uk)
- Electronic communications and marketing: under the Privacy and Electronic Communications Regulations (PECR), we need consent for some direct marketing by electronic means (for example marketing emails about commercial activities). You can opt out at any time.

Transfers and security;

We use appropriate technical and organisational measures to keep personal data secure and limit access to those with a business need. Where external providers process data on our behalf we have contracts requiring appropriate security and that they act only on our instructions.

Third-party services and apps;

If your child uses third-party apps or cloud services as part of teaching or clubs, we will ensure contracts are in place and confirm lawful bases for those uses. For some vendor uses we may also rely on DfE procurement arrangements. Please contact the DPO if you want details of specific vendors and the lawful bases we rely on.

Further information and contacts;

- DPO: Satwana - admin@satswana.com
- For queries about the NPD or DfE handling of pupil data: see the DfE NPD privacy notice.

- To complain to the ICO: ico.org.uk/concerns.

Changes to this notice;

We will review this notice regularly and update it when required by changes in law or practice. The date of the latest revision should be included on the published version.

Sources and guidance used to update this notice;

- GOV.UK — Data protection in schools (DfE) — guidance and model privacy notices. (updated March 2026). (gov.uk)
- Department for Education — National Pupil Database: privacy notice. (DfE). (gov.uk)
- ICO guidance — UK GDPR resources; Data protection by design and by default (updated Feb 2026 to reflect DUAA). (ico.org.uk)
- DfE privacy notice guidance and templates. (assets.publishing.service.gov.uk)