GDPR Privacy Notice

Who processes your information?

Beenham Primary School is the data controller for the personal information you provide to us. This means the school determines the purposes for which, and the manner in which, personal data relating to pupils and their families is processed. The Governing Board has overall responsibility for ensuring that the school complies with data protection legislation.

Data Protection Officer

The school's Data Protection Officer (DPO) service is provided by SchoolDPO.

The Data Protection Officer can be contacted at:

Email: info@schooldpo.com
Website: www.schooldpo.com

The Data Protection Officer provides independent advice and support to the school on its data protection obligations and acts as a point of contact for individuals in relation to the processing of their personal data and the exercise of their rights under data protection legislation.

Why do we collect and use your information?

Beenham Primary School processes personal data in accordance with UK GDPR and the Data Protection Act 2018. The lawful bases under Article 6 UK GDPR that we rely on include:

- Article 6(1)(c) – Legal obligation
- Article 6(1)(e) – Public task

Where we process special category data (such as information about health, SEND, ethnicity or safeguarding), we rely on Article 9 UK GDPR, including:

• Article 9(2)(g) – Substantial public interest
• Article 9(2)(h) – Health or social care purposes
We do not rely on consent as a general lawful basis for processing pupil data, except where specifically stated (for example, use of photographs).

We process pupil data in order to comply with our statutory duties, including those under the Education Act 1996 and The Education (Information About Individual Pupils) (England) Regulations 2013.

In accordance with the above, the personal data of pupils and their families is collected and used for the following reasons:

- To support pupil learning
- To monitor and report on pupil progress
- To provide appropriate pastoral care
- To assess the quality of our service
- To comply with the law regarding data
- To safeguard pupils

Which data is collected?

The categories of pupil information that the school collects, holds and shares include the following:

- Personal information – e.g. names, pupil numbers and addresses
- Characteristics – e.g. ethnicity, language, nationality, country of birth and free school meal eligibility
- Attendance information – e.g. number of absences and absence reasons
- Assessment information – e.g. national curriculum assessment results
- Relevant medical information
- Information relating to SEND
- Behavioural information – e.g. number of temporary exclusions
- Safeguarding and child protection information

Whilst the majority of the personal data you provide to the school is mandatory, some is provided on a voluntary basis. When collecting data, the school will inform you whether you are required to provide this data or if your consent is needed. Where consent is required, the school will provide you with specific and explicit information with regards to the reasons the data is being collected and how the data will be used.

How long is your data stored for?

Personal data is retained in accordance with the school's Records Retention Schedule, which is based on the Information and Records Management Society (IRMS) Toolkit for Schools.
We do not keep personal data for longer than is necessary.
Records are securely destroyed when they reach the end of their retention period.

Will my information be shared?

The school is required to share pupils' data with the DfE on a statutory basis.

The National Pupil Database (NPD) is managed by the DfE and contains information about pupils in schools in England. Beenham Primary School is required by law to provide information about our pupils to the DfE as part of statutory data collections, such as the school census; some of this information is then stored in the NPD. The DfE may share information about our pupils from the NPD with third parties who promote the education or wellbeing of children in England by:

- Conducting research or analysis
- Producing statistics
- Providing information, advice or guidance

The DfE has robust processes in place to ensure the confidentiality of any data shared from the NPD is maintained.

Beenham Primary School shares personal information where there is a lawful basis to do so. In most cases this will be because we are under a legal obligation or because sharing is necessary for the performance of our public task as a school.

We may also share information where safeguarding concerns arise or where we are required to do so by law.

The school routinely shares pupils' information with:

- Pupils' destinations upon leaving school
- West Berkshire Council (our local authority)
- Other local authorities where pupils reside or transfer
- The NHS
- The DfE
- School caterers
- SCOPAY
- Pixl Education
- CPOMS
- Residential and educational visit providers

CCTV images and recordings

The school operates CCTV at the school premises. CCTV captures images of individuals who enter or move around areas covered by the cameras, which may include pupils, parents and carers, staff, visitors and contractors.

We use CCTV where necessary for purposes including safeguarding pupils, staff and visitors; maintaining the security of the school site; preventing and investigating crime, vandalism and unauthorised access; protecting school property; and assisting with the investigation of incidents where this is necessary and proportionate.

Access to CCTV recordings is restricted to authorised members of staff. Recordings are normally retained for 30 days and are then

automatically overwritten or securely deleted unless footage needs to be preserved for a specific incident, safeguarding concern, investigation, complaint, insurance claim or legal proceedings.

CCTV footage may be shared where there is a lawful and proportionate reason to do so, for example with the police, safeguarding agencies, insurers or legal advisers. Further information is available in the school's CCTV Policy.

How do we keep your information secure?

We take the security of personal information seriously.
We have appropriate technical and organisational measures in place to protect personal data against unauthorised access, alteration, disclosure or destruction.
This includes secure IT systems, controlled access to records, staff training, and policies governing the safe handling of information.

What are your rights?

Parents and pupils have the following rights in relation to the processing of their personal data.

You have the right to:

- Be informed about how Beenham Primary School uses your personal data.
- Request access to the personal data that Beenham Primary School holds.
- Request that your personal data is amended if it is inaccurate or incomplete.
- Request that your personal data is erased where there is no compelling reason for its continued processing
- Request that the processing of your data is restricted.
- Object to your personal data being processed.
- The right to data portability (where applicable).

- The right to lodge a complaint with the Information Commissioner's Office (ICO).

Where the processing of your data is based on your consent, you have the right to withdraw this consent at any time.

If you have a concern about the way Beenham Primary School is collecting or using your personal data, we request that you raise your concern with us in the first instance.

You have the right to make a complaint to the Information Commissioner's Office (ICO) if you are unhappy with how we have handled your personal data.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
www.ico.org.uk

Where can you find out more information?

If you would like to find out more information about how we and/or the DfE collect, use and store your personal data, please download our Data Protection and GDPR Policy or contact our Headteacher Miss Sophie McBean.

Change History

Version	Date	Change
2.0	March 2026	Final compliance review of GDPR Privacy Notice and Data Protection and GDPR Policy completed prior to governing board approval. Documents confirmed aligned with UK GDPR, Data Protection Act 2018, IRMS retention guidance and ICO breach reporting expectations.
3.0	September 2026	CCTV images and recordings section added. DPO details amended.

Approved by: Full Governing Board
Date approved: October 2026
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