



The Federation of the Church Schools of
Shalfleet and Freshwater & Yarmouth

Together for a Brighter Future

PUPIL PRIVACY NOTICE (2026 Edition)

How we use pupil information

1. Who we are

The Federation of the Church Schools of Shalfleet and Freshwater & Yarmouth collects and uses personal information about pupils and their families. We are the **Data Controller** for this information.

Data Protection Officer (DPO):

Email: DPO@iow.gov.uk Phone: 01983 821000

2. The personal data we collect

The DfE and government requires us to collect a lot of data by law, so that they can monitor and support schools more widely, as well as checking on individual schools' effectiveness.

We collect and process the following categories of information:

- Personal identifiers (name, date of birth, address, contact details)
- Unique pupil numbers (UPN), identifiers from previous schools
- Characteristics (gender, ethnicity, language)
- Attendance and absence information
- Assessment, attainment and progress data
- Behaviour, exclusions and pastoral information
- Special educational needs (SEN) and support plans
- Safeguarding information
- Medical and health information
- Photographs and video (where consent is required)
- Information about use of school systems and devices
- Free school meal eligibility
- Information required for statutory returns to the DfE
- CCTV, photos and video recordings of you are also personal information (stored for 30 days rolling)
- Catering and Free School Meal management

3. Why we collect and use this information

We use pupil data to:

- Support teaching and learning
- Monitor and report on progress
- Provide appropriate pastoral care

- Keep pupils safe (safeguarding and child protection; food allergies, emergency contact details)
- Meet our statutory duties (e.g., attendance, census returns, DfE, data collections)
- To comply with our legal obligations to share data
- Provide SEND support and EHCP processes
- Contact parents/carers when needed
- To manage behaviour
- Manage school trips, events and activities
- To enable targeted, personalised learning for pupils
- Meet legal obligations and statutory duties placed on schools
- Assess the quality of our services.
- To keep children safe

4. Our lawful bases for using pupil data

Under UK GDPR, we rely on:

- **Public Task (Article 6(1)(e))** – educating and safeguarding pupils
- **Legal Obligation (Article 6(1)(c))** – required by education and safeguarding laws
- **Vital Interests (Article 6(1)(d))** – protecting life
- **Consent (Article 6(1)(a))** – only for optional activities (e.g., photos, trips)

For special category data (e.g., health, SEN, ethnicity), we rely on:

- **Substantial Public Interest (Article 9(2)(g))**
- **Safeguarding and statutory functions (DPA 2018, Schedule 1)**

We must make sure that information we collect and use about pupils is in line with the UK General Data Protection Regulation (UK GDPR). This means that we must have a lawful reason to collect the data, and that if we share that with another organisation or individual, we must have a legal basis to do so.

The lawful basis for schools to collect information comes from a variety of sources, such as the Education Act 1996, Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013, Article 6 and Article 9 of the UK GDPR.

The Department of Education and Local Authorities require us to collect certain information and report back to them. This is called a 'public task' and is recognised in law as it is necessary to provide the information.

We also have obligations to collect data about children who are at risk of suffering harm, and to share that with other agencies who have a responsibility to safeguard children, such as the police and social care.

We also share information about pupils who may need to have an Education Health and Care Plan (or Statement of Special Educational Needs). Medical teams have access to

some information about pupils, either by agreement or because the law says we must share that information, for example school nurses may visit the school.

Counselling services, careers services, occupational therapists are the type of people we will share information with, so long as we have consent or are required by law to do so.

We must keep up to date information about parents and carers for emergency contacts.

5. Who we share pupil information with

We routinely share information with:

- Isle of Wight Council
- Department for Education (DfE)
- NHS services (school nursing, immunisation teams)
- Other schools when pupils move
- Social care and safeguarding partners
- Educational psychologists and SEND services
- Exam boards
- Approved school IT and learning platforms
- Transport providers (where applicable)
- The Police

We only share information when it is **lawful, necessary and proportionate**.

6. How we store and protect data

Pupil information is stored securely in:

- Our MIS (Arbor)
- Secure cloud systems
- Password-protected files
- Locked physical storage

We use encryption, access controls, staff training and secure deletion processes.

7. How long we keep pupil data

We follow the **IRMS Toolkit for Schools (2024)** retention schedule. Examples:

- Pupil file: until the pupil is 25
- Safeguarding file: until the pupil is 25
- Attendance: current year + 3 years
- SEN records: until the pupil is 31

A full retention schedule is available on request.



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8. Your rights

You have the right to:

- Access the information we hold
- Request correction of inaccurate data
- Request deletion (where applicable)
- Request restriction of processing
- Object to processing (in limited cases)
- Withdraw consent (for consent-based processing)

To exercise these rights, contact the DPO.

9. Complaints

If you are unhappy with how we use your data:

1. Contact the school DPO
2. If unresolved, contact the ICO: www.ico.org.uk