



Bosham Primary School

Bosham Primary School, Walton Lane, Bosham, West Sussex PO18 8QF

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Bosham Primary School Privacy Notice

Approved by Governors	13.07.26.
Chair of Governors	Lou Adams
To be reviewed	Summer 2027

1. Who We Are

Bosham Primary School
Walton Lane
Bosham
Chichester
West Sussex
PO18 8QF

Bosham Primary School is the **Data Controller** for the purposes of UK data protection law. This means we are responsible for deciding how we hold and use personal information about pupils, parents, staff and others. We are committed to protecting the privacy and security of personal data in accordance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Education legislation

2. Data Protection Officer (DPO)

Our Data Protection Officer is:

Kate Robst

Email: sbm@boshamprimary.co.uk

Address: Bosham Primary School, Walton Lane, Bosham, Chichester, West Sussex PO18 8QF

The DPO oversees our data protection compliance and can be contacted with any queries or concerns.

3. The Personal Information We Collect

We collect and process personal data about pupils, parents/carers, staff, governors and visitors.

3.1 Pupil Information

- Personal identifiers (name, date of birth, unique pupil number, address)
- Contact details (parent/carer contact information)
- Attendance information
- Assessment and attainment records
- Behaviour and exclusion records
- Special Educational Needs and Disabilities (SEND) information
- Safeguarding information
- Medical and health information (including allergies)
- Photographs and video recordings
- Dietary requirements
- Characteristics data (such as ethnicity, first language, free school meal eligibility)
- Online identifiers (such as IP addresses when using school systems)

3.2 Parent/Carer Information

- Names and contact details
- Relationship to child

- Communications records
- Financial information where applicable (e.g. school meals, trips)

3.3 Staff Information

- Employment records
- Payroll information
- DBS and safeguarding checks
- Professional development records
- Performance management information

3.4 Governor Information

- ☐ Contact details
- ☐ DBS information
- Governance records

3.5 Recruitment and Job Applicant Information

When individuals apply to work at Bosham Primary School, we collect and process personal information as part of the recruitment and safer recruitment process.

- ☐ Name, address and contact details
- ☐ Employment history and qualifications
- ☐ Application forms, CVs and covering letters
- ☐ References provided by previous employers
- ☐ Right to work documentation
- ☐ Identity verification documents
- ☐ Professional registration details where applicable
- ☐ Interview notes and assessment records
- ☐ Disclosure and Barring Service (DBS) information and other safeguarding checks
- ☐ Medical information where relevant to employment
- Equal opportunities monitoring information, where provided

Why We Use This Information

We collect and process recruitment information in order to:

- ☐ Assess suitability for employment
- ☐ Verify qualifications and employment history
- ☐ Meet our safeguarding obligations and safer recruitment requirements
- ☐ Carry out pre-employment checks
- ☐ Comply with employment law and education regulations
- ☐ Make reasonable adjustments during the recruitment process where required
- Maintain appropriate recruitment records

Lawful Bases for Processing

We process recruitment data under the following UK GDPR lawful bases:

- ☐ Article 6(1)(b) – Processing necessary to take steps at the request of the applicant before entering into an employment contract
- ☐ Article 6(1)(c) – Processing necessary to comply with legal obligations
- Article 6(1)(e) – Processing necessary for the performance of a task carried out in the public interest

Where special category data is processed, such as health information or equality monitoring information, we rely on the relevant conditions under Article 9 UK GDPR and Schedule 1 of the Data Protection Act 2018.

Sharing Recruitment Information

Recruitment information may be shared, where appropriate, with:

- ☐ Previous employers and referees
- ☐ The Disclosure and Barring Service (DBS)
- ☐ The Teaching Regulation Agency (TRA)
- ☐ Local authority and safeguarding agencies
- ☐ Occupational health providers
- ☐ Professional bodies or regulators

Retention of Recruitment Records

Information relating to unsuccessful applicants will normally be retained for up to six months following the completion of the recruitment process, unless a longer retention period is required by law. Information relating to successful applicants will be transferred to their personnel file and retained in accordance with the school's retention schedule.

4. Why We Collect and Use Personal Information

We use personal data to:

- Safeguard and promote the welfare of pupils
- Support pupils' learning and educational progress
- Provide appropriate pastoral care
- Meet SEND requirements
- Manage admissions
- Maintain attendance records
- Provide school meals and manage allergies
- Communicate with parents and carers
- Comply with legal and statutory obligations
- Support health and safety
- Manage our workforce

We may also use photographs and videos for:

- Educational purposes
- Displays within school
- Newsletters and social media (with parental consent)

5. Our Lawful Bases for Processing

Under UK GDPR, we rely on the following lawful bases:

5.1 Article 6 Lawful Bases

We process personal data under:

- **Article 6(1)(e) – Public Task**
Processing necessary for us to perform our official functions as a school.
- **Article 6(1)(c) – Legal Obligation**
Where we are required to process data under education law.
- **Article 6(1)(d) – Vital Interests**
To protect a child's life in emergency situations.
- **Article 6(1)(b) – Contract**
For employment contracts and service agreements.
- **Article 6(1)(a) – Consent**
For certain uses such as social media photographs.

5.2 Special Category Data (Article 9)

We process sensitive personal data (e.g. health, SEND, ethnicity) under:

- **Article 9(2)(g) – Substantial Public Interest** (safeguarding and education)
- **Article 9(2)(h) – Health or social care purposes**
- **Article 9(2)(a) – Explicit Consent**, where required

6. Sharing Personal Information

We share personal data only where necessary and lawful.

We may share data with:

- West Sussex County Council (Local Authority)
- The Department for Education (DfE)
- The National Pupil Database (NPD)
- Ofsted
- NHS services (e.g. school nurse)
- Safeguarding partners
- Other schools (when pupils transfer)
- Examination bodies (if applicable)
- IT service providers and educational software providers
- Bromcom
- Microsoft 365
- ☐ CPOMS
- ☐ Times Tables Rock Stars
- ☐ My Child At School
- Google
- Catering providers
- Chartwells until August 2026
- ISS from July 2026
- Wraparound care providers

- Active8Minds
- Police or social services (where required)

We do not share information without consent unless the law allows or requires us to do so, particularly for safeguarding purposes.

7. Department for Education (DfE)

We are required to share certain pupil data with the DfE under education law. This data contributes to national statistics and the National Pupil Database.

For further information, see: [Data Protection](#)

8. International Transfers

Some school systems may process data in data centres located outside the UK. Where this occurs, we ensure appropriate safeguards are in place in accordance with UK GDPR requirements. Where this occurs, we ensure appropriate safeguards are in place, such as:

- UK adequacy regulations
- International data transfer agreements
- Standard contractual clauses

9. How Long We Keep Personal Data

We retain personal data in accordance with the **Information and Records Management Society (IRMS) Schools Retention Schedule**.

Examples:

- Pupil educational record: retained until age 25
- Safeguarding records: retained until age 25 or longer if required
- Attendance registers: retained for 3 years

When information is no longer required, it is securely deleted or destroyed.

10. CCTV

We currently do not operate CCTV in any area of the school. If we did we would inform parents and only use this to:

- Safeguard pupils, staff and visitors
- Protect school property

CCTV will never be used in private areas such as toilets or changing rooms. Footage will only be securely stored and accessed only by authorised personnel.

11. Data Security

We take appropriate technical and organisational measures to protect personal data, including:

- Secure electronic systems with password protection
- Access controls based on role
- Staff data protection training
- Secure storage of paper records
- Encryption where appropriate
- Secure disposal of confidential waste

12. Automated Decision-Making

We do not use automated decision-making or profiling in relation to pupils.

13. Your Data Protection Rights

Under UK GDPR, individuals have the right to:

- Be informed about how we use personal data
- Access their personal data (Subject Access Request) - Subject Access Requests will normally be responded to within one calendar month, unless an extension is permitted under data protection law.
- Request correction of inaccurate data
- Request erasure (in certain circumstances)
- Restrict processing (in certain circumstances)
- Object to processing
- Withdraw consent (where processing is based on consent)
- Data portability (where applicable)

Parents usually exercise these rights on behalf of younger children. To exercise any of these rights, contact the DPO. Where a pupil is considered competent to understand their data protection rights, the school will respond directly to the pupil where appropriate.

14. Complaints

If you have concerns about how we handle personal data, please contact the school in the first instance.

You also have the right to lodge a complaint with:

Information Commissioner's Office (ICO)

Website: www.ico.org.uk

Helpline: 0303 123 1113

15. Website and Cookies

Our website may collect limited technical data such as IP addresses and may use cookies.

16. Changes to This Privacy Notice

We may update this privacy notice from time to time. The most recent version will always be available on our website.

Child-Friendly Privacy Notice

We collect and use information for lots of important reasons. The law says we must keep your information safe.

Information we collect includes:

- Your name and date of birth
- Your address
- Your school work and progress
- Your attendance
- Information to help keep you safe
- Medical information (like allergies)

We use this information to:

- Teach you
- Keep you safe
- Help you if you need extra support
- Run the school properly

Sometimes we must share information with:

- Your new school (if you move)
- The local council
- The government
- Doctors or social workers (if we are worried about you)

You have rights:

- You can ask what information we have about you
- You can ask us to fix mistakes
- You can ask questions about how we use your information

If you are worried, speak to your teacher or ask your parent or carer to contact our Data Protection Officer.

We only use your photograph for social media if your parents say it is okay. You can change your mind at any time.