

GODALMING LEARNING PARTNERSHIP

# Privacy Notices
# Sept 2026

Source: the Key, the DfE & ICO
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## Table of Contents


**1. Privacy notice for parents and carers** ..... 2
**2. Privacy notice for pupils** ..... 6
**3. Privacy notice for staff** ..... 10
**4. Privacy notice for governors and trustees** ..... 14

# 1. Privacy notice for parents and carers

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about parents, carers and/or pupils.
We, Witley C of E Infant School, Church Lane, Witley, Surrey, GU8 5PN are the 'data controller' for the purposes of data protection law.
Our data protection officer is Rachel Dunnage from the Godalming Learning Partnership (see 'Contact us' below).

### The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about parents, carers and/or pupils includes, but is not restricted to:

- Personal identifiers and contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Characteristics, such as ethnic background, eligibility for free school meals, or special educational needs
- Suspension and exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs

We may also hold data about pupils that we have received from other organisations, including other schools, local authorities and the Department for Education.

### Why we use this data

We use this data to:

- Support pupil learning
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Protect pupil welfare
- Assess the quality of our services
- Administer admissions waiting lists
- Carry out research
- Comply with the law regarding data sharing

### Our legal basis for using this data

We only collect and use pupils' personal data when the law allows us to. Under the UK General Data protection regulation (UKGDPR), the lawful bases we most commonly rely on for processing information are when:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest

Less commonly, we may also process pupils' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use pupils' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.
Some of the reasons listed above for collecting and using pupils' personal data overlap, and there may be several grounds which justify our use of this data.

## Collecting this information

We collect pupil and parent/carers data via several means e.g. admissions forms, Common Transfer Files (CTF), secure file transfer from a previous school. While the majority of information we collect is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

## Storing this data

We hold personal information securely while your children are attending our school. We may also keep it beyond their attendance at our school if this is necessary to comply with our legal obligations. Our Records Retention Schedule, which forms part of our Information Management policy, sets out how long we keep information about parents, carers and/or pupils.

You can find our Retention Schedule on our website here: GDPR. Alternatively, please contact the school office: office@witley.surrey.sch.uk.

## Data sharing

We do not share information about parents, carers and/or pupils with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about parents, carers and/or pupils with:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
- The Department for Education - to meet our legal obligations to share certain information with it, such as pupil numbers, attendance, FSM numbers
- The pupil's family and representatives – to meet our legal obligations to share certain information with them, such as reporting on pupil progress
- Schools that the pupils attend after leaving us
- School Nurse
- Educators and examining bodies – to meet our legal obligations to share certain information with them, such as reporting pupil attainment and progress
- Our regulator, Ofsted, to meet our legal obligations to share certain information with them, to assess the quality of our services.
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Financial organisations, Surrey County Council and auditors, to perform an official task in the public interest and to meet our legal obligations to share certain information with it.
- Health authorities & Health and social welfare organisations – where we have obtained consent to use it for pupil welfare
- Professional advisers and consultants - where we have obtained consent to use it for pupil welfare
- Charities and voluntary organisations
- Police forces, courts, tribunals – where we need to protect the individual's vital interests
- Professional bodies

## How Government uses pupils' data

Some of the information about pupils that we lawfully share with the Department for Education (DfE) through data collections is used:

- to calculate our school funding, which changes according to the numbers of children and their characteristics in each school. This information is collected annually through the school census which we are required to complete under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.
- for education policy monitoring and judging how well schools are doing and if they need additional help
- for research and monitoring of the government's educational policy (e.g. how pupil subject choices go on to affect what they study or earn after school)

### Data collection requirements

To find out more about the data collection requirements placed on us by the Department for Education go to www.gov.uk/education/data-collection-and-censuses-for-schools All data is transferred securely and held by the Department for Education (DfE) under a combination of software and hardware controls, which meet the current government security policy framework

**National Pupil Database**
We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school census.
Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the Department and provides evidence on school performance to inform research.
The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

**Sharing by the Department for Education**
The Department for Education may share information from the database with other organisations which promote children's education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data.
You can find more information about this on the Department for Education's webpage on how it collects and shares research data.

**How to find out what personal information the DfE holds about you**
Under the terms of the Data Protection Act 2018, you are entitled to ask the Department:

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter. You can also contact the Department for Education if you have any questions about the database.

**Transferring data internationally**
Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

## Parents, carers and pupils' rights regarding personal data
Parents or carers have a right to make a request with respect to their own or their child's personal information that the school holds, where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.
You do not need to use special wording or a form; it just needs to be clear what personal data you are requesting.
If you make a **subject access request (SAR)**, and if we do hold information about you or your child, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

We will usually respond within one calendar month. If your request is complex, we can extend this by up to two further months, but we will let you know and explain why. We may need to ask for proof of identity to make sure we are giving information to the right person. More information on how to make a request about your personal data can be found on our website: GDPR Witley CofE Infant

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.
If you would like to make a request please contact our data protection officer.

Parents/carers also have a legal right to access to their child's **educational record**. To request access, please contact the school office: office@witley.surrey.sch.uk

**Other rights**
Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress

- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations
- Where we are processing your personal data with your consent, you have the right to withdraw that consent.

To exercise any of these rights, please contact our data protection officer.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests.

## Complaints

We take any complaints about our collection and use of personal information very seriously.
If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance, using the form on our website: GDPR Witley CofE Infant

If you need help completing a form, please contact the school office or our Data Protection Officer and we will assist you.

We will acknowledge your complaint and **aim to respond in full within 30 days.** If we need more time we will let you know. If your concern remains unresolved after **31 days**, contact our Data Protection Officer (DPO): Rachel Dunnage DPO@godalminglearning.org.uk

If your concern has not been resolved by the DPO after a further calendar month, you can contact the Information Commissioner's Office (ICO):

- Make a complaint about how an organisation has used your personal information | ICO
- Call 0303 123 1113

## Updates to this Notice

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated September 2026.

## Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

- Rachel Dunnage, DPO@godalminglearning.org.uk

*This notice is based on the Department for Education's model privacy notice (Oct 2025), amended to reflect the way we use data in this school.*

# 2. Privacy notice for pupils

You have a legal right to be informed about how our school uses any personal information that we hold about you. To comply with this, we provide a 'privacy notice' to you where we are processing your personal data.
This privacy notice explains how we collect, store and use personal data about you.
We, Witley C of E Infant School, Church Lane, Witley, Surrey, GU8 5PN, are the 'data controller' for the purposes of data protection law.
Our data protection officer is Rachel Dunnage (see 'Contact us' below).

### The personal data we hold

We hold some personal information about you to make sure we can help you learn and look after you at school.
For the same reasons, we get information about you from some other places too – like other schools, the local council and the government.
This information includes:

- Information that identifies you, for example your name, your pupil number and your contact details
- Your test results
- Your attendance records
- Your characteristics, like your ethnic background or any special educational needs
- Any medical conditions you have
- Details of any behaviour issues or exclusions
- Safeguarding information, for example additional ways that we, or other professionals, are keeping you safe
- Photographs

### Why we use this data

We use this data to help run the school, including to:

- Get in touch with you and your parents when we need to
- Support your learning
- Check how you're doing in exams and work out whether you or your teachers need any extra help
- Track how well the school as a whole is performing
- Look after your safety and wellbeing

### Our legal basis for using this data

We will only collect and use your information when the law allows us to. Under the UK General Data protection regulation (UKGDPR), the lawful bases we most commonly rely on for processing information are when:

- We need to comply with the law
- We need to use it to carry out a task in the public interest (in order to provide you with an education)

Sometimes, we may also use your personal information where:

- You, or your parents/carers have given us permission to use it in a certain way
- We need to protect your interests (or someone else's interest)

Where we have got permission to use your data, you or your parents/carers may withdraw this at any time. We will make this clear when we ask for permission, and explain how to go about withdrawing consent.
Some of the reasons listed above for collecting and using your information overlap, and there may be several grounds which mean we can use your data.

### Collecting this information

While in most cases you, or your parents/carers, must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data.
We will always tell you if it's optional. If you must provide the data, we will explain what might happen if you don't.

### Storing this data

We hold personal information securely while you are attending our school. We may also keep it after you have left the school, where we are required to by law.
We have an Information Management Policy and Retention Schedule which sets out how long we must keep information about pupils and/or parents, carers. You can find our Retention Schedule on our website: GDPR Witley CofE Infant.
Alternatively, please contact the school office if you would like to request a copy of this: office@witley.surrey.sch.uk.

## Data sharing

We do not share personal information about you with anyone outside the school without permission from you or your parents/carers, unless the law and our policies allow us to do so.

Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you with:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions
- The Department for Education - to meet our legal obligations to share certain information with it, such as pupil numbers, attendance, FSM numbers
- Your family and representatives – to meet our legal obligations to share certain information with them, such as reporting on your progress
- Educators and examining bodies – to meet our legal obligations to share certain information with them, such as reporting your academic attainment and progress
- Our regulator, Ofsted, to meet our legal obligations to share certain information with them, to assess the quality of our school's provision for you.
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Schools that you join after leaving us
- Financial organisations, Surrey County Council and auditors, to perform an official task in the public interest and to meet our legal obligations to share certain information with it.
- Health authorities & Health and social welfare organisations – where we have obtained consent to use it for your welfare
- Professional advisers and consultants - where we have obtained consent to use it for your welfare
- Charities and voluntary organisations
- Police forces, courts, tribunals – where we need to protect your welfare and safety
- Professional bodies

## How Government uses your data

Some of the information about you that we lawfully share with the Department for Education (DfE) through data collections is used:

- to calculate our school funding, which changes according to the numbers of children and their characteristics in each school.
- for education policy monitoring and judging how well schools are doing and if they need additional help
- for research and monitoring of the government's educational policy (e.g. how your subject choices go on to affect what you study or earn after school)

### Data collection requirements

To find out more about the data collection requirements placed on us by the Department for Education go to www.gov.uk/education/data-collection-and-censuses-for-schools

### The National Pupil Database (NPD)

We are required to provide information about you to the Department for Education (a government department) as part of data collections such as the school census. Some of this information is then stored in the National Pupil Database, which is managed by the Department for Education and provides evidence on how schools are performing. This, in turn, supports research. The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards and others.

### Sharing by the Department for Education

The Department for Education may share information from the database with other organisations which promote children's education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data.

You can find more information about this on the Department for Education's webpage on how it collects and shares research data.

### How to find out what personal information the DfE holds about you

Under the terms of the Data Protection Act 2018, you are entitled to ask the Department:

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter. You can also contact the Department for Education if you have any questions about the database.

**Transferring data internationally**
Where we share data with an organisation that is based outside the European Economic Area, we will protect your data by following data protection law.

## Your rights

**How to access personal information we hold about you**
You can find out if we hold any personal information about you, and how we use it, by making a **'subject access request'**, as long as we judge that you can properly understand your rights and what they mean.
You do not need to use special wording or a form; it just needs to be clear what personal data you are requesting.
If you make a **subject access request (SAR)**, and if we do hold information about you or your parents, we will:

- Give you a description of it
- Tell you why we are holding and using it, and how long we will keep it for
- Explain where we got it from, if not from you or your parents
- Tell you who it has been, or will be, shared with
- Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)
- Give you a copy of the information in an understandable form

We will usually respond within one calendar month. If your request is complex, we can extend this by up to two further months, but we will let you know and explain why. We may need to ask for proof of identity to make sure we are giving information to the right person. More information on how to make a request about your personal data can be found on our website: GDPR Witley CofE Infant.

You may also ask us to send your personal information to another organisation electronically in certain circumstances.
If you want to make a request please contact our data protection officer.

**Your other rights over your data**
You have other rights over how your personal data is used and kept safe, including the right to:

- Say that you don't want it to be used if this would cause, or is causing, harm or distress
- Stop it being used to send you marketing materials
- Say that you don't want it used to make automated decisions (decisions made by a computer or machine, rather than by a person)
- Have it corrected, deleted or destroyed if it is wrong, or restrict our use of it
- Claim compensation if the data protection rules are broken and this harms you in some way
- Where we are processing your personal data with your consent, you have the right to withdraw

There are some lawful reasons why we may refuse your information rights request, which depend on why we are processing it. For example, some rights will not apply:

- right to have it destroyed does not apply when the lawful basis for processing is legal obligation or public task.
- right to say that you don't want it used does not apply when the lawful basis for processing is contract, legal obligation or vital interests.

## Complaints

We take any complaints about our collection and use of personal information very seriously. If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance, using the form on our website:
GDPR Witley CofE Infant.
If you need help completing a form, please contact the school office or our Data Protection Officer and we will assist you.

We will acknowledge your complaint and **aim to respond in full within 30 days.** If we need more time we will let you know. If your concern remains unresolved after **31 days**, contact our Data Protection Officer (DPO): Rachel Dunnage DPO@godalminglearning.org.uk.

If your concern has not been resolved by the DPO after a further calendar month, you can contact the Information Commissioner's Office (ICO):

- Make a complaint about how an organisation has used your personal information | ICO
- Call 0303 123 1113

## Last updated

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated September 2026.

## Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer:

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

- Rachel Dunnage, DPO@godalminglearning.org.uk

*This notice is based on the Department for Education's model privacy notice (Oct 2025), amended to reflect the way we use data in this school.*

# 3. Privacy notice for staff

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.
This privacy notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our school.
We, Witley C of E Infant School, Church Lane, Witley, Surrey, GU8 5PN, are the 'data controller' for the purposes of data protection law.
Our data protection officer is Rachel Dunnage (see 'Contact us' below).

### The personal data we hold

We process data relating to those we employ, or otherwise engage, to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence
- Photographs
- Data about your use of the school's information and communications system

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Health, including any medical conditions, and sickness records

### Why we use this data

The purpose of processing this data is to help us run the school, including to:

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body

### Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Under the UK General Data protection regulation (UKGDPR), the lawful bases we most commonly rely on for processing information are when:

- We need it to fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so.
Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

## Collecting this information

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.
Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

## Storing this data

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.
Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our Information Management policy and Retention Schedule. You can find this policy and schedule on our website: GDPR Witley CofE Infant. Alternatively, please contact the school office if you would like to request a copy of this: office@witley.surrey.sch.uk.

## Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.
Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- Our local authority – We are required to share information about our workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.
- Department for Education - The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our school employees with the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments. All data is transferred securely and held by DfE under a combination of software and hardware controls which meet the current government security policy framework.
- Your family and representatives – where we have obtained consent to use it for your welfare, such as in an medical emergency.
- Educators and examining bodies – to meet our legal obligations to share certain information with them, such as reporting staffing structure
- Our regulator, Ofsted, to meet our legal obligations to share certain information with them, to assess the quality of our school's education.
- Financial organisations, Surrey County Council and auditors, to perform an official task in the public interest and to meet our legal obligations to share certain information with it, e.g. payroll/bank details
- Health authorities & Health and social welfare organisations – where we have obtained consent to use it for your welfare, such as notifying of medical conditions in the event of an emergency.
- Professional advisers and consultants - where we have obtained consent to use it for your welfare
- Police forces, courts, tribunals – where we need to protect your welfare and safety

### Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

### How Government uses your data

The workforce data that we lawfully share with the DfE through data collections:

- informs departmental policy on pay and the monitoring of the effectiveness and diversity of the school workforce
- links to school funding and expenditure
- supports 'longer term' research and monitoring of educational policy

### Data collection requirements

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to https://www.gov.uk/education/data-collection-and-censuses-for-schools.

**Sharing by the Department**
The Department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested; and
- the arrangements in place to securely store and handle the data

To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

**How to find out what personal information DfE hold about you**
Under the terms of the Data Protection Act 2018, you're entitled to ask the Department:

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:
https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter
To contact the department: https://www.gov.uk/contact-dfe

## Your rights

**How to access personal information we hold about you**

Staff have a right to make a request with respect to the personal information that the school holds.
You do not need to use special wording or a form; it just needs to be clear what personal data you are requesting.
If you make a **subject access request (SAR)**, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

We will usually respond within one calendar month. If your request is complex, we can extend this by up to two further months, but we will let you know and explain why. We may need to ask for proof of identity to make sure we are giving information to the right person. More information on how to make a request about your personal data can be found on our website: GDPR Witley CofE Infant.

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.
If you would like to make a request, please contact our data protection officer.

**Your other rights regarding your data**
Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress

- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations
- Where we are processing your personal data with your consent, you have the right to withdraw

To exercise any of these rights, please contact our data protection officer.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests.

## Complaints

We take any complaints about our collection and use of personal information very seriously.
If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance, using the form on our website: GDPR Witley CofE Infant.

If you need help completing a form, please contact the school office or our Data Protection Officer and we will assist you.

We will acknowledge your complaint and **aim to respond in full within 30 days.** If we need more time we will let you know. If your concern remains unresolved after **31 days**, contact our Data Protection Officer (DPO): Rachel Dunnage DPO@godalminglearning.org.uk.

If your concern has not been resolved by the DPO after a further calendar month, you can contact the Information Commissioner's Office (ICO):

- Make a complaint about how an organisation has used your personal information | ICO
- Call 0303 123 1113

## Last updated

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated September 2026.

## Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

- Rachel Dunnage DPO@godalminglearning.org.uk

*This notice is based on the Department for Education's model privacy notice (Oct 2025), amended to reflect the way we use data in this school.*

# 4. Privacy notice for governors and trustees

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal governors and trustees.
We, Witley C of E Infant School, Church Lane, Witley, Surrey, GU8 5PN, are the 'data controller' for the purposes of data protection law.
Our data protection officer Rachel Dunnage (see 'Contact us' below).

**The categories of governance information that we process include:**

- personal data (e.g. name, email address, contact details and postcode)
- term of office information (such as start date and role)
- attendance information
- register of interests

School governors are also required to be Disclosure and Barring Service (DBS) checked in accordance with statutory regulations. This check necessitates the presentation of personal original documents that evidence identity and personal address details (usually to school office staff). However, these documents, or copies, are **not** retained or shared.

### Why we collect and use this data

The personal data collected is essential, in order for the school to fulfil its official functions and meet legal requirements.
We collect and use governors' data to:

- meet the statutory duties placed upon us under section 538 of the Education Act 1996 (maintained schools) and under the Academies Financial Handbook (academy trusts)
- publish statutorily required information about the governing body on the school website
- populate the Department for Education (DfE) Get Information about School (GIAS) Database in accordance with statutory regulations
- circulate information to the governing body to enable them to undertake their role and functions
- enable the Local Authority/SAfE/Strictly Education4S/Guildford Diocese/National Governance Association to maintain a database of school governors facilitating appropriate information being communicated to them including the Local Authority's statutory duty to provide access to governor development and training opportunities
- keep you safe whilst on-site
- share Chair and Vice Chair contact information with Local Authority for use in an emergency

### Collecting governance information

We collect personal information via **governor or trustee details and register of interests forms.**
Governance data is essential for the school's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it may be requested on a voluntary basis. In order to comply with UK GDPR, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this.

### Storing this data

We hold personal information securely while you are a governor/trustee at our school. We may also keep it beyond your term of office at our school if this is necessary to comply with our legal obligationsWe have an Information management policy and Retention Schedule which sets out how long we must keep information about governors or trustees.
You can find this policy and schedule on our website: GDPR Witley CofE Infant. Alternatively, please contact the school office if you would like to request a copy of this: office@witley.surrey.sch.uk.

### Data sharing

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so. Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- the Local Authority
- the Department for Education (DfE)
- SAfE, so it can fulfill its statutory duty to the Local Authority for managing governance services

- Strictly Education4S, so it can manage your membership and training records
- Guildford Diocese, so it can manage its governance services and training records
- National Governance Association, so it can manage your membership and training records
- Godalming Learning Partnership, so it can contact you with governance-relevant information

We are required to share information about our governance roles with the Department for Education (DfE) under section 538 of the Education Act 1996

## Your rights

**How to access personal information we hold about you**

Governors/Trustees have a right to make a request with respect to the personal information that the school holds.
You do not need to use special wording or a form; it just needs to be clear what personal data you are requesting.
If you make a **subject access request (SAR)**, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

We will usually respond within one calendar month. If your request is complex, we can extend this by up to two further months, but we will let you know and explain why. We may need to ask for proof of identity to make sure we are giving information to the right person. More information on how to make a request about your personal data can be found on our website: GDPR Witley CofE Infant.

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.
If you would like to make a request, please contact our data protection officer.

**How to find out what personal information the Department for Education holds about you**

Under the terms of the Data Protection Act 2018, you're entitled to ask the Department:

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department, you should make a 'subject access request'.
Further information on how to do this can be found within the Department's personal information charter.
To contact the department: https://www.gov.uk/contact-dfe

**Your other rights regarding your data**

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations
- Where we are processing your personal data with your consent, you have the right to withdraw that consent.

To exercise any of these rights, please contact our data protection officer.

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- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests.

## Complaints

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We will acknowledge your complaint and **aim to respond in full within 30 days.** If we need more time we will let you know. If your concern remains unresolved after **31 days**, contact our Data Protection Officer (DPO): Rachel Dunnage DPO@godalminglearning.org.uk

If your concern has not been resolved by the DPO after a further calendar month, you can contact the Information Commissioner's Office (ICO):

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## Last updated

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## Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Clerk to Governors or **data protection officer**:

- Emma Killington Clerk to Governors: clerk@governors.witley.surrey.sch.uk
- Rachel Dunnage DPO: DPO@godalminglearning.org.uk

*This notice is based on the Department for Education's model privacy notice (Oct 2025), amended to reflect the way we use data in this school.*
*End*