

FEDERATION PRIVACY NOTICES

2026-2027

The Federation of Broughton and West Tytherley
Primary Schools



Approved by:	FGB	Date: September 2026
Last reviewed on:	September 2026	
Next review due by:	September 2027	

FEDERATION PRIVACY NOTICE PACK

2026/2027

Six privacy notices for the Federation

Prepared with reference to UK GDPR, Data Protection Act 2018, Data (Use and Access) Act 2025 and Department for Education guidance updated 9 July 2026.

Document control and implementation

Version	1.0
Effective date	September 2026
Approved by	Federation Governing Body
Approval date	September 2026
Next review	September 2027 (or sooner if law/guidance or processing changes)

This pack is designed for both Broughton Primary School and West Tytherley Primary School. Both are Hampshire County Council maintained schools. Hampshire County Council's published school data-protection guidance states that schools are their own data controllers. The wording in this pack therefore identifies each school as a controller for the personal information it processes, while recognising that Hampshire County Council can be a separate controller for its own statutory functions and services. Before formal adoption, the Federation's Data Protection Officer should verify DPO contact details, actual suppliers/systems, retention schedules, data-sharing arrangements and any school-specific processing.

Federation details to complete

Data controller	Broughton Primary School and West Tytherley Primary School - each school is a data controller for the personal information it processes
Data Protection Officer	Clare Yates – Senior Admin Officer
DPO email	c.yates@broughton.hants.sch.uk c.yates@west-tytherley.hants.sch.uk
DPO postal address	Broughton Primary School, School Lane, Broughton, Stockbridge, Hants, SO20 8AN
Broughton Primary School contact	adminoffice@broughton.hants.sch.uk
West Tytherley Primary School contact	adminoffice@west-tytherley.hants.sch.uk

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1. Pupil, Parent and Carer Privacy Notice

Version	1.0
Effective date	September 2026
Approved by	Federation Governing Body
Approval date	[September 2026
Next review	September 2027 (or sooner if law/guidance or processing changes)

This notice explains how the Federation collects and uses personal information about pupils and their parents/carers at Broughton Primary School and West Tytherley Primary School.

Who is the data controller?

Broughton Primary School and West Tytherley Primary School are maintained schools within the Federation. Each school is a data controller for the personal information it processes and is responsible for complying with UK data protection legislation. The schools are maintained by Hampshire County Council. Hampshire County Council may also act as a separate data controller for personal information it processes in carrying out its own statutory functions or providing its own services. Our Data Protection Officer (DPO) is Clare Yates – Senior Admin Officer – email: c.yates@broughton.hants.sch.uk / c.yates@west-tytherley.hants.sch.uk

Relationship with Hampshire County Council

Hampshire County Council is not the data controller for information held and processed by the schools simply because the schools are maintained by the Council. Hampshire County Council confirms that schools are their own data controllers and are responsible for data protection requests relating to school-held information. Where Hampshire County Council collects or uses personal information for its own statutory functions or services - for example, certain admissions, Children's Services, governance support or other Local Authority functions - it may be a separate data controller and its own privacy notice will apply.

The information we collect

- Identity and contact details, including names, dates of birth, addresses, pupil identifiers and parent/carers contacts.
- Admissions, attendance, punctuality, absence and exclusion/suspension information.
- Assessment, attainment, curriculum, learning and educational records.
- SEND, EHCP, inclusion, accessibility and support information.
- Health, medical, medication, first-aid, allergy and dietary information where needed.
- Safeguarding, child-protection, pastoral, welfare, behaviour and incident information.
- Characteristics and special category information where lawfully required, including information used for statutory equality, census or support purposes.
- Photographs, video, pupil work and recordings where appropriate.
- School meals, free school meals, funding eligibility, trips, clubs, activities and emergency information.
- Communications with pupils and families.
- IT account, device, access, cybersecurity, filtering and monitoring information.
- Information required for statutory returns, including school census and information supplied to the Department for Education (DfE).

Where information comes from

- Pupils and parents/carers.
- Previous schools, nurseries and educational settings.
- Hampshire County Council and other public authorities.
- Health, social care, safeguarding and specialist services.
- School staff and professionals supporting the child.

- DfE and other statutory systems where applicable.
- School systems, devices and approved service providers.

Why we use it and our lawful bases

We use information to provide education; monitor progress and attendance; safeguard children; support SEND, health and wellbeing; administer admissions, meals, trips, clubs and school services; communicate with families; manage behaviour and incidents; meet funding, census and accountability requirements; maintain secure IT and safeguarding systems; and comply with legal duties.

For each processing activity we identify a lawful basis. In a maintained-school context this will commonly be public task and/or legal obligation. Contract, vital interests, legitimate interests where available and appropriate, or consent may apply to particular activities. Special category and criminal offence information is processed only where the additional legal conditions are satisfied. We do not rely on consent where another lawful basis is more appropriate.

Who we may share information with

- DfE and its agencies, including statutory data collections.
- Hampshire County Council and relevant local-authority services.
- Other schools or educational settings when a pupil transfers or where sharing is otherwise lawful.
- Safeguarding partners, social care, health services and police where necessary.
- Ofsted, auditors, inspectors, courts, regulators and other bodies with statutory powers.
- IT, MIS, communications, safeguarding, filtering/monitoring, meals, trips and other approved service providers acting under appropriate arrangements.
- Professional advisers, insurers and legal representatives where necessary.

We do not sell pupil or family personal information.

Filtering, monitoring, EdTech and AI

The schools may use filtering and monitoring technologies to meet safeguarding, cybersecurity and acceptable-use responsibilities. Information may include usernames, device identifiers, web activity, searches, alerts and technical logs. Access is restricted and monitoring must be necessary and proportionate. New educational technology, including AI-enabled services, will be assessed for privacy, security, children's higher-protection needs, supplier arrangements, retention, international transfers and the need for a Data Protection Impact Assessment (DPIA).

Automated decision-making

The Federation does not routinely make decisions about pupils solely by automated means that have legal or similarly significant effects. If such processing is introduced, we will identify a lawful basis, provide the required information and safeguards, and comply with the additional restrictions applying to special category data.

International transfers

Where an approved supplier processes information outside the UK, we will ensure that an appropriate UK transfer mechanism and safeguards are in place.

How long we keep information

We keep personal information only for as long as necessary for the purpose for which it was collected and in line with our retention schedule, statutory requirements, safeguarding requirements and any need to establish, exercise or defend legal claims. Information is securely deleted or destroyed when no longer required.

Your data protection rights

Depending on the circumstances and lawful basis, you may have rights of access, rectification, erasure, restriction, objection and data portability, and rights relating to automated decision-making. Some rights are

subject to legal exemptions. Where processing is based on consent, consent may be withdrawn at any time without affecting processing already carried out lawfully.

Questions, requests and complaints

Please contact the Federation Data Protection Officer at c.yates@broughton.hants.sch.uk / c.yates@west-tytherley.hants.sch.uk Broughton Primary School, School Lane, Broughton, Stockbridge, Hants, SO20 8AN. The Federation will operate a data protection complaints process. In accordance with the Data (Use and Access) Act 2025 requirements now in force, complaints will be acknowledged within 30 days and answered without undue delay. You also have the right to complain to the Information Commissioner's Office (ICO).

Changes to this notice

This notice will be reviewed at least annually and sooner where there is a significant change in legislation, statutory guidance, systems, suppliers, data sharing or the purposes for which information is used.

2. Child-Friendly Privacy Notice

Version	1.0
Effective date	September 2026
Approved by	Federation Governing Body
Approval date	September 2026
Next review	September 2027 (or sooner if law/guidance or processing changes)

Your information belongs to you

School keeps some information about you because we need it to teach you, help you and keep you safe. We have rules about how we use it and who can see it.

What might we know about you?

- Your name, birthday and who looks after you.
- Your learning, progress and attendance.
- Things that help us support you, including SEND information.
- Health, allergy or medical information when we need it to keep you safe.
- Information about wellbeing, behaviour or safeguarding when needed.
- Photos or videos when there is a proper reason to use them.
- Information about trips, clubs and school meals.
- Information about how school computers and online systems are used, including safeguarding filtering and monitoring.

Why do we use it?

- To help you learn and make progress.
- To keep you and other people safe.
- To give you the right help and support.
- To run school activities and services.
- To follow the law and the rules schools must follow.

Who might we tell?

Usually, only people who need the information will see it. Sometimes we need to share information with your parent or carer, another school, the council, doctors or health workers, social workers, the police or other organisations. We only do this when there is a proper reason.

Your questions and rights

You can ask us what information we have about you and why we use it. As you grow older, your views and understanding become increasingly important when we decide how to deal with requests about your information. If you are worried, talk to a trusted adult, your teacher, the school office or our Data Protection Officer.

Keeping it safe

We use secure systems, passwords, access controls and staff training to help keep information safe. We do not keep information forever.

If you are unhappy

Tell a trusted adult at school or contact our Data Protection Officer: Clare Yates – Senior Admin Officer – email: c.yates@broughton.hants.sch.uk / c.yates@west-tytherley.hants.sch.uk. You can also ask an adult to help you contact the ICO, which is the UK's data protection regulator.

3. Staff Privacy Notice

Version	1.0
Effective date	September 2026
Approved by	Federation Governing Body
Approval date	September 2026
Next review	September 2027 (or sooner if law/guidance or processing changes)

This notice applies, as relevant, to employees, temporary and supply staff, trainees and others working within the Federation.

Information we collect

- Identity, contact and emergency-contact details.
- Recruitment, references, right-to-work, qualifications, employment history and safer-recruitment records.
- DBS and safeguarding information where required.
- Contract, role, pay, bank, tax, pension and payroll information.
- Attendance, leave, absence, sickness and occupational-health information.
- Performance management, appraisal, capability, grievance, disciplinary, training and professional-development information.
- Equality and special category information where lawfully collected.
- IT, email, device, access-control, cybersecurity, filtering and monitoring information.
- Photographs, recordings, correspondence, complaints, investigations and legal records where relevant.

Why we use it

- Recruitment, employment and workforce administration.
- Payroll, pensions, tax and benefits.
- Safeguarding and safer recruitment.
- Attendance, wellbeing, performance, training and conduct management.
- Compliance with employment, education, equality, health and safety and other legal duties.
- Secure operation of IT, communications and premises.
- Investigation of incidents, complaints or suspected misuse.
- Statutory reporting, audit, inspection and legal claims.

Lawful bases and sensitive information

The lawful basis depends on the activity and may include legal obligation, public task, contract and legitimate interests where appropriate. Special category and criminal offence information is used only where the additional legal conditions are met.

Monitoring

School IT, email, internet, devices, access systems and security tools may be monitored where lawful, necessary and proportionate for safeguarding, cybersecurity, compliance, service management or investigation. Staff should also read the Federation's IT/acceptable-use, filtering and monitoring and related policies.

Sharing

- Hampshire County Council and payroll/pension providers where applicable.
- HMRC, pension schemes and statutory bodies.
- DBS and safeguarding bodies.
- Occupational health, HR, training, IT and other approved providers.
- Insurers, auditors, professional advisers and legal representatives.
- Regulators, inspectors, police, courts and public authorities where lawful and necessary.

How long we keep information

We keep personal information only for as long as necessary for the purpose for which it was collected and in line with our retention schedule, statutory requirements, safeguarding requirements and any need to establish, exercise or defend legal claims. Information is securely deleted or destroyed when no longer required.

Your data protection rights

Depending on the circumstances and lawful basis, you may have rights of access, rectification, erasure, restriction, objection and data portability, and rights relating to automated decision-making. Some rights are subject to legal exemptions. Where processing is based on consent, consent may be withdrawn at any time without affecting processing already carried out lawfully.

Questions, requests and complaints

Please contact the Federation Data Protection Officer at: c.yates@broughton.hants.sch.uk / c.yates@west-tytherley.hants.sch.uk Broughton Primary School, School Lane, Broughton, Stockbridge, Hants, SO20 8AN. The Federation will operate a data protection complaints process. In accordance with the Data (Use and Access) Act 2025 requirements now in force, complaints will be acknowledged within 30 days and answered without undue delay. You also have the right to complain to the Information Commissioner's Office (ICO).

Changes to this notice

This notice will be reviewed at least annually and sooner where there is a significant change in legislation, statutory guidance, systems, suppliers, data sharing or the purposes for which information is used.

4. Governor Privacy Notice

Version	1.0
Effective date	September 2026
Approved by	Federation Governing Body
Approval date	September 2026
Next review	September 2027 (or sooner if law/guidance or processing changes)

This notice covers personal information used to support governance of the Federation.

Information we collect

- Name, title and contact details.
- Governance role, term of office and appointment information.
- Declarations of interests and governance disclosures.
- DBS and safeguarding information where required.
- Training and development records.
- Meeting attendance, correspondence, minutes and governance actions.
- Information required for statutory returns or publication.
- Photographs/biographies where appropriate.
- Information required for safeguarding, audit, insurance or legal purposes.

Why we use it

We use governor information to operate lawful and effective governance, communicate with governors, meet statutory publication and reporting duties, maintain governance records, support safeguarding and accountability, arrange training and respond to audit, inspection or legal requirements.

Sharing and publication

Where required, information may be shared with or published for DfE, Get Information About Schools, Hampshire County Council, auditors, inspectors, safeguarding bodies and other lawful recipients. Only information that is required or appropriate will be published.

How long we keep information

We keep personal information only for as long as necessary for the purpose for which it was collected and in line with our retention schedule, statutory requirements, safeguarding requirements and any need to establish, exercise or defend legal claims. Information is securely deleted or destroyed when no longer required.

Your data protection rights

Depending on the circumstances and lawful basis, you may have rights of access, rectification, erasure, restriction, objection and data portability, and rights relating to automated decision-making. Some rights are subject to legal exemptions. Where processing is based on consent, consent may be withdrawn at any time without affecting processing already carried out lawfully.

Questions, requests and complaints

Please contact the Federation Data Protection Officer at c.yates@broughton.hants.sch.uk / c.yates@west-tytherley.hants.sch.uk Broughton Primary School, School Lane, Broughton, Stockbridge, Hants, SO20 8AN. The Federation will operate a data protection complaints process. In accordance with the Data (Use and Access) Act 2025 requirements now in force, complaints will be acknowledged within 30 days and answered without undue delay. You also have the right to complain to the Information Commissioner's Office (ICO).

Changes to this notice

This notice will be reviewed at least annually and sooner where there is a significant change in legislation, statutory guidance, systems, suppliers, data sharing or the purposes for which information is used.

5. Website, Photography, Video and CCTV Privacy Notice

Version	1.0
Effective date	September 2026
Approved by	Federation Governing Body
Approval date	September 2026
Next review	September 2027 (or sooner if law/guidance or processing changes)

Website and online forms

When someone contacts either school through its website or an approved online form, we may collect contact details and the information submitted. We use this to respond to enquiries, administer school services and meet legal or operational duties.

Cookies and analytics

Our websites may use cookies and similar technologies. We will provide clear information and obtain consent for non-essential cookies where required by applicable privacy and electronic communications law.

Photography and video

The schools may take photographs or video during lessons, trips, productions, sports, clubs and events. The lawful basis depends on the purpose. Some images may be necessary for educational, safeguarding or administrative purposes; optional publicity uses may rely on consent where appropriate. We consider the audience, purpose, necessity and safeguarding implications before publication.

- Possible uses include school displays and newsletters; prospectuses and publications; school websites; official school social-media accounts where used; local media where appropriate; productions and events; and educational or promotional material where lawful.

CCTV – currently not installed in either school

Where CCTV is used, it is for defined purposes such as safeguarding, security, crime prevention and protection of people and property. Cameras will not be placed in areas where there is a high expectation of privacy. Appropriate signage will be used, access will be restricted and footage will be kept only for the period specified in the school's CCTV arrangements unless required for an incident, investigation or legal purpose.

Children's privacy and online services

When choosing and configuring online services likely to be used by children, we take account of children's higher-protection needs, privacy by design and default, age-appropriate information, data minimisation and the best interests of the child.

Third-party platforms

Approved website, form, communications and EdTech suppliers may process information on our behalf under appropriate contracts. Where a provider is a separate controller, its own privacy notice also applies.

How long we keep information

We keep personal information only for as long as necessary for the purpose for which it was collected and in line with our retention schedule, statutory requirements, safeguarding requirements and any need to establish, exercise or defend legal claims. Information is securely deleted or destroyed when no longer required.

Your data protection rights

Depending on the circumstances and lawful basis, you may have rights of access, rectification, erasure, restriction, objection and data portability, and rights relating to automated decision-making. Some rights are subject to legal exemptions. Where processing is based on consent, consent may be withdrawn at any time without affecting processing already carried out lawfully.

Questions, requests and complaints

Please contact the Federation Data Protection Officer at c.yates@broughton.hants.sch.uk / c.yates@west-tytherley.hants.sch.uk Broughton Primary School, School Lane, Broughton, Stockbridge, Hants, SO20 8AN. The Federation will operate a data protection complaints process. In accordance with the Data (Use and Access) Act 2025 requirements now in force, complaints will be acknowledged within 30 days and answered without undue delay. You also have the right to complain to the Information Commissioner's Office (ICO).

Changes to this notice

This notice will be reviewed at least annually and sooner where there is a significant change in legislation, statutory guidance, systems, suppliers, data sharing or the purposes for which information is used.

6. Visitors, Volunteers, Contractors and Suppliers Privacy Notice

Version	1.0
Effective date	September 2026
Approved by	Federation Governing Body
Approval date	September 2026
Next review	September 2027 (or sooner if law/guidance or processing changes)

Information we may collect

- Name, contact details, organisation and role.
- Visitor sign-in/out information and identification.
- DBS, safeguarding or compliance information where required.
- Vehicle registration where necessary for site security.
- Appointments, communications and records of work/services.
- Accessibility, health or emergency information voluntarily provided where necessary.
- Supplier contracts, purchase orders, invoices, bank/payment and tax information.
- CCTV and security information where applicable.

Why we use it

- Safeguarding and controlling access to school premises.
- Arranging visits, volunteering, services, clubs and activities.
- Safer-recruitment or safeguarding checks where required.
- Managing contracts, purchasing, invoices and payments.
- Communicating with suppliers and providers.
- Site security and investigation of incidents.
- Meeting legal, regulatory, insurance and audit requirements.

Sharing

Where lawful and necessary, information may be shared with Hampshire County Council, safeguarding partners, DBS/vetting bodies, insurers, auditors, professional advisers, service providers, police, courts or other public authorities. We do not sell this information.

How long we keep information

We keep personal information only for as long as necessary for the purpose for which it was collected and in line with our retention schedule, statutory requirements, safeguarding requirements and any need to establish, exercise or defend legal claims. Information is securely deleted or destroyed when no longer required.

Your data protection rights

Depending on the circumstances and lawful basis, you may have rights of access, rectification, erasure, restriction, objection and data portability, and rights relating to automated decision-making. Some rights are subject to legal exemptions. Where processing is based on consent, consent may be withdrawn at any time without affecting processing already carried out lawfully.

Questions, requests and complaints

Please contact the Federation Data Protection Officer at c.yates@broughton.hants.sch.uk / c.yates@west-tytherley.hants.sch.uk Broughton Primary School, School Lane, Broughton, Stockbridge, Hants, SO20 8AN. The Federation will operate a data protection complaints process. In accordance with the Data (Use and Access) Act

2025 requirements now in force, complaints will be acknowledged within 30 days and answered without undue delay. You also have the right to complain to the Information Commissioner's Office (ICO).

Changes to this notice

This notice will be reviewed at least annually and sooner where there is a significant change in legislation, statutory guidance, systems, suppliers, data sharing or the purposes for which information is used.

Appendix A - Publication and Compliance Checklist

- ☐ Confirm the Federation's legal data controller and DPO details.
- ☐ Map each notice against the Record of Processing Activities (ROPA).
- ☐ Check actual MIS, email, website, payment, meals, safeguarding, filtering/monitoring, EdTech, AI, cloud and communications suppliers.
- ☐ Confirm processor contracts, controller relationships and international-transfer safeguards.
- ☐ Review DPIAs, particularly for high-risk technology, monitoring, CCTV and children's data.
- ☐ Check the retention schedule against the records described in this pack.
- ☐ Confirm school census/DfE and Hampshire County Council sharing arrangements.
- ☐ Confirm the DUAA-compliant data protection complaints route, including an accessible electronic method.
- ☐ Check photography/video consent arrangements and media/social-media practices.
- ☐ Check CCTV signage, purposes, retention and access arrangements if CCTV is used.
- ☐ Check website cookie controls and cookie information.
- ☐ Publish appropriate notices on both school websites and make paper copies available on request.
- ☐ Provide the child-friendly notice in an age-appropriate format and explain it to pupils where appropriate.
- ☐ Brief staff, governors and relevant volunteers on where their privacy notice is located.
- ☐ Review annually and whenever significant processing or legal/guidance changes occur.

Approval record

Approved by	Federation Governing Body
Date	21/09/2026
Effective date	September 2026
Review date	September 2027

Appendix B - Legal and Guidance References

This pack was drafted against official sources current on 11 August 2026. The DfE data-protection-in-schools manual was updated on 9 July 2026 to reflect DUAA changes coming into force on 8 July 2026 and to add a new EdTech section. The ICO updated sector-specific privacy-notice material on 7 July 2026 and staff/volunteer material on 10 July 2026.

- Department for Education: Data protection in schools (updated 9 July 2026).
- Department for Education: The Data Use and Access Act 2025 - school guidance.
- Department for Education: Data processing a school is permitted to do (updated 9 July 2026).
- Department for Education: Data protection policies and procedures.
- Department for Education: Generative artificial intelligence (AI) and data protection in schools (updated 9 July 2026).
- Information Commissioner's Office: Create your own privacy notice (July 2026 updates).
- Information Commissioner's Office: Children and the UK GDPR.
- Information Commissioner's Office: Data protection by design and by default (updated February 2026).
- Information Commissioner's Office: Data (Use and Access) Act 2025 guidance, including complaints requirements.
- UK GDPR; Data Protection Act 2018; Data (Use and Access) Act 2025.

Important governance note: privacy notices must describe what the schools actually do. This pack should therefore be approved only after the DPO has checked it against the Federation's real systems, contracts, ROPA, retention schedule, DPIAs and data-sharing arrangements.