



Privacy Notice

Document control

Policy title	Privacy Notice
Policy category	Governance and Compliance
Policy owner	The Bursar (the School's designated data protection contact)
Senior leader responsible	The Bursar
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Next review	September 2027
Statutory status	Required by Articles 13 and 14 of the UK General Data Protection Regulation (transparency and the right to be informed). The DfE guidance <i>Issuing privacy notices: guidance for schools and local authorities</i> (August 2026) confirms that every school must make its privacy notices freely available to those whose personal data it handles.
Applies to	Pupils, parents and others whose personal data the School processes
Availability	Published on the School website and available to pupils and parents on request.

Policy summary

This notice explains what personal data Cokethorpe School collects about pupils, parents and others, why and on what legal basis we use it, who we share it with, how long we keep it, how we keep it secure, and the rights available to individuals — including how to raise a query or complaint.

Staff, volunteers and governors should refer to the **Staff Privacy Notice** for information about how the School processes their personal data in connection with their role.

Contents

1. Why this matters and what this notice is for.....	3
2. What we are seeking to achieve	3
3. Who we are and who this notice covers.....	3
4. Data protection contact	3
5. Why the School needs to process personal data.....	4
6. Types of personal data processed by the School	5
7. How the School collects data.....	6
8. Who has access to personal data and who the School shares it with.....	6
9. International transfers of personal data.....	6
10. How long we keep personal data	7
11. Keeping in touch and supporting the School	7
12. Automated decision-making and profiling.....	8
13. Your rights	8
Right of access	Error! Bookmark not defined.
Right to rectification.....	Error! Bookmark not defined.
Right to erasure	Error! Bookmark not defined.
Right to restriction of processing	Error! Bookmark not defined.
Right to data portability.....	Error! Bookmark not defined.
Right to object.....	Error! Bookmark not defined.
Right to withdraw consent.....	Error! Bookmark not defined.
Requests that cannot be fulfilled	Error! Bookmark not defined.
Pupil requests	Error! Bookmark not defined.
Parental requests.....	Error! Bookmark not defined.
Whose rights?	Error! Bookmark not defined.
14. Data accuracy and security.....	10
15. Queries and complaints	10
16. Training and communication.....	10
17. Monitoring, review and publication	10
18. Related School policies and procedures.....	10
19. Legislation, regulation and guidance	11
Version history	Error! Bookmark not defined.

1. Why this matters and what this notice is for

This Privacy Notice explains how the School uses (or 'processes') personal data about individuals, including:

- Its current, past and prospective pupils and their parents, carers or guardians (referred to in this policy as 'parents')

This information is provided because Data Protection Law gives individuals the right to understand how their data is used. Parents and pupils are all encouraged to read this Privacy Notice and understand the School's obligations to its entire community.

This Privacy Notice applies alongside any other information the School may provide about a particular use of personal data, for example when collecting data via an online or paper form. This Privacy Notice also applies in addition to the School's other relevant terms and conditions and policies, including:

- Any contract between the School and the parents of pupils
- The School's policy on taking, storing and using images of children
- The School's CCTV and/or biometrics policy
- The School's retention of records policy
- The School's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded
- The School's Digital Technology Policy

All those who handle personal data on the School's behalf (including staff, volunteers, governors and service providers) must do so in accordance with this notice and with Data Protection Law.

2. What we are seeking to achieve

We are committed to handling personal data lawfully, fairly and transparently. Through this notice we aim to explain clearly what information we hold, why we hold it and what individuals can expect from us, so that our community can have confidence in the way we look after personal information.

3. Who we are and who this notice covers

In accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, the School has notified the Information Commissioner's Office of its processing activities. The School's ICO registration number is Z5441947 and its registered address is Cokethorpe School, Witney, Oxon OX29 7PU. Registered Company number 0767293 and Charity number 309650.

4. Data protection contact

The School has assessed its processing activities and determined that it is not required to appoint a Data Protection Officer (the School's designated data protection contact) under Article 37 of the UK GDPR. The Bursar acts as the School's designated data protection contact and will deal with all requests and enquiries concerning the School's uses of personal data and endeavour to ensure that all personal data is processed in compliance with this Privacy Notice and Data Protection Law.

The Bursar can be contacted on 01993 892327 or bursar@cokethorpe.org

5. Why the School needs to process personal data

In order to carry out its ordinary duties to pupils and parents, the School needs to process a wide range of personal data about individuals (including current, past and prospective pupils and parents) as part of its daily operation. The School will need to carry out some of this activity in order to fulfil its legal rights, duties or obligations, including those under a contract with parents of its pupils.

Other uses of personal data will be made in accordance with the School's legitimate interests, or the legitimate interests of another, if these are not outweighed by the impact on individuals and provided it does not involve special or sensitive types of data.

The School expects that the following uses will fall within that category of its 'legitimate interests':

- For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents)
- To provide education services, including musical education, physical training or spiritual development, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs
- Maintaining relationships with alumni and the School community, including by post and other non-electronic means
- For the purposes of donor due diligence, and to confirm the identity of prospective donors and their background and relevant interests
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as diversity monitoring or census returns)
- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate
- To give and receive information and references about past, current and prospective pupils, including relating to outstanding fees or payment history, to/from any educational institution that the pupil attended or where it is proposed they attend and to provide references to potential employers of past pupils
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils of the School
- To safeguard pupils' welfare and provide appropriate pastoral care
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's Digital Technology Policy
- To make use of photographic images of pupils in School publications, on the School website and (where appropriate) on the School's social media channels in accordance with the School's policy on taking, storing and using images of children
- For security purposes, including biometrics and CCTV in accordance with the School's biometrics or CCTV policy
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School

In addition, the School will, on occasion, need to process special category personal data (concerning health, ethnicity, religion, biometrics or sexual life) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding, or from time to time by explicit consent where required. These reasons will include:

- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs
- To provide educational services in the context of any special educational needs of a pupil
- To provide spiritual education in the context of any religious beliefs
- To run any of its systems that operate on biometric data, such as for security and other forms of pupil identification (lockers, lunch etc)
- As part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are SEN, health or safeguarding elements
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care

Drug and alcohol testing

Where there is reason to suspect that a pupil has been involved with drugs or substances, or as part of a supportive monitoring agreement following an incident, the School may ask the pupil to provide a urine sample for testing using a point-of-care screening kit. Where a supportive monitoring arrangement is in place, parents may also conduct home tests using an approved kit and submit a photograph of the result to the School via the approved secure route. Drug test results are special category personal data concerning health, and where they indicate the presence of a controlled substance they may also constitute criminal offence data.

The School processes this data on the basis of its legitimate interests in safeguarding pupils and maintaining a safe environment (Article 6(1)(f) UK GDPR), and relies on the safeguarding of children and individuals at risk condition (Schedule 1, Part 2, paragraph 18 of the Data Protection Act 2018) as its condition for processing special category data. A Data Protection Impact Assessment has been completed for this processing. Test results are shared only with those who need to know, stored securely in the Designated Safeguarding Lead's confidential records, and retained in accordance with the School's retention schedule. The pupil's right to decline a test, and the full testing procedure, are set out in the Drugs, Alcohol, Smoking and Vaping Policy.

6. Types of personal data processed by the School

This will include by way of example:

- Names, addresses, telephone numbers, e-mail addresses and other contact details
- Car details (about those who use our car parking facilities)
- Bank details and other financial information, e.g. about parents who pay fees to the School
- Past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks
- Safeguarding files and pastoral records.
- Where appropriate, information about individuals' health and welfare, and contact details for their next of kin
- References given or received by the School about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils
- Correspondence with and concerning staff, pupils and parents past and present

- Images of pupils (and occasionally other individuals) engaging in School activities, and images captured by the School's CCTV system (in accordance with the School's policy on taking, storing and using images of children)

7. How the School collects data

Generally, the School receives personal data from the individual directly (including, in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments). However, in some cases personal data will be supplied by third parties (for example another school, or other professionals or authorities working with that individual) or collected from publicly available resources.

8. Who has access to personal data and who the School shares it with

Occasionally, the School will need to share personal information relating to its community with third parties, such as:

- Professional advisers (e.g. lawyers, insurers, PR advisers and accountants)
- Government authorities (e.g. HMRC, DfE, police or the local authority)
- Appropriate regulatory bodies (e.g. the Teaching Regulation Agency (TRA), the Independent Schools Inspectorate, the Charity Commission or the Information Commissioner)

For the most part, personal data collected by the School will remain within the School and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). Particularly strict rules of access apply in the context of:

- Medical records held and accessed only by the School Nurse and appropriate medical staff under their supervision, or otherwise in accordance with express consent
- Pastoral or safeguarding files

However, a certain amount of any SEN pupil's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

Staff, pupils and parents are reminded that the School is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes safeguarding files, and where relevant, personnel files and in some cases referrals to relevant authorities such as the LADO or police. For further information about this, please view the School's Safeguarding Policy.

Finally, in accordance with Data Protection Law, some of the School's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the School's specific directions.

9. International transfers of personal data

Some of the School's third-party service providers and processors are based outside the UK, or store data on servers located outside the UK. Where personal data is transferred to or accessed from outside the UK, the School takes steps to ensure that appropriate safeguards are in place in accordance with UK GDPR requirements, such as relying on the UK's adequacy decisions, or

ensuring that contracts incorporating the International Data Transfer Agreement (IDTA) or equivalent approved clauses are in place.

If you have any queries about the specific safeguards applied to international transfers of your personal data, please contact the Bursar.

10. How long we keep personal data

The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Typically, the legal recommendation for how long to keep ordinary pupil personnel files is up to 7 years following departure from the School. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

If you have any specific queries about how our retention policy is applied or wish to request that personal data you no longer believe to be relevant is considered for erasure, please contact the Bursar. However, please bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data even following such a request.

A limited and reasonable amount of information will be kept for archiving purposes. Even where you have requested we no longer keep in touch with you, we will need to keep a record of that fact in order to fulfil your wishes (called a 'suppression record').

11. Keeping in touch and supporting the School

The School will use the contact details of parents, alumni and other members of the School community to keep them updated about the activities of the School, or alumni and parent events of interest.

For postal communications, the School relies on its legitimate interests to maintain relationships with the School community. For electronic direct marketing communications (such as emails or text messages), the School will only send such communications where it has obtained the appropriate consent required under the Privacy and Electronic Communications Regulations (PECR), or where the 'soft opt-in' exemption applies (for example, where individuals are existing contacts and the communication relates to similar activities and they have been given a clear opportunity to opt out).

Unless the relevant individual objects, the School may also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the School community, such as the Cokethorpe Parents' and Friends' Association (CPFA) and Cokethorpe Society (OCs)
- Contact parents and/or alumni (including via the organisations above) by post and email in order to promote and raise funds for the School and, where appropriate, other worthy causes
- Collect information from publicly available sources about parents' and former pupils' occupation and activities, in order to maximise the School's fundraising potential

Should you wish to limit or object to any such use, or would like further information about it, please contact the Bursar in writing. You always have the right to withdraw consent, where given, or otherwise to object to direct marketing or fundraising. However, the School is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that address, email or telephone number).

12. Automated decision-making and profiling

The School does not carry out any automated decision-making or profiling activities using personal data that produce legal or similarly significant effects on individuals. All significant decisions relating to staff, pupils or parents are made by appropriate members of staff.

13. Your rights

Under UK GDPR, individuals have a number of rights in relation to their personal data. These are set out below. Please note that some rights are subject to exemptions and limitations, and the School will consider each request on its own merits.

Right of access

Individuals have the right to obtain a copy of their personal data held by the School and information about how it is processed. Any individual wishing to access their personal data should put their request in writing to the Bursar. The School will endeavour to respond within one month.

Right to rectification

Individuals have the right to request that inaccurate or incomplete personal data held about them is corrected. Please notify the Bursar of any changes to information held about you.

Right to erasure

Individuals may request that the School erases their personal data in certain circumstances (the 'right to be forgotten'). However, the School will sometimes have compelling reasons to refuse such requests, for example a legal requirement or a legitimate interest identified in this Privacy Notice.

Right to restriction of processing

Individuals may ask the School to restrict the processing of their personal data in certain circumstances, for example while a request for rectification is being considered.

Right to data portability

Where processing is based on consent or contract and carried out by automated means, individuals have the right to receive their personal data in a structured, commonly used and machine-readable format, and to have it transferred to another controller where technically feasible.

Right to object

Individuals have the right to object to the processing of their personal data where that processing is based on the School's legitimate interests. This right is particularly relevant to direct marketing and fundraising activities. On receipt of an objection, the School must stop processing unless it can demonstrate compelling legitimate grounds for the processing which override the individual's interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

If you wish to exercise your right to object — including objecting to direct marketing or fundraising contact — please write to the Bursar. Your objection will be acted on promptly.

Right to withdraw consent

Where the School is relying on consent as the lawful basis for processing, individuals may withdraw that consent at any time. Examples of processing based on consent include biometrics, certain uses of photographic images, and electronic direct marketing. Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal. Please be aware that the School may have another lawful basis to continue processing even without consent.

Requests that cannot be fulfilled

The right of access is limited to your own personal data and certain data is exempt from the right of access. This includes information which identifies other individuals (and parents need to be aware this may include their own children in certain limited situations), or information which is subject to legal privilege.

The School is not required to disclose any pupil examination scripts (other than information consisting solely of pupil test answers), provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the School itself for the purposes of the education, training or employment of any individual.

Pupil requests

Pupils can make subject access requests for their own personal data provided that, in the reasonable opinion of the School, they have sufficient maturity to understand the request they are making. Pupils at Senior School/aged 13 and above are generally assumed to have this level of maturity, although this will depend on the child and the personal data requested. A pupil of any age may ask a parent or other representative to make a subject access request on their behalf, though for older pupils the parent may need to evidence their child's authority for the specific request.

Parental requests

Parents may not always have a statutory right of access to their child's personal data, but they will often have a legitimate interest or expectation in receiving certain information about pupils. The School may consider there are lawful grounds for sharing information with or without reference to the pupil. All information requests from, on behalf of, or concerning pupils will be considered on a case by case basis.

Where parents are separated the School will (in most cases) aim to provide the same information to each person with parental responsibility, but may need to factor in all the circumstances including the express wishes of the child.

Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates. The School will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils. Where consent is required, it may be necessary or appropriate given the pupil's age and understanding to seek the pupil's consent rather than, or in addition to, parental consent.

In general, the School will assume that pupils' consent is not required for ordinary disclosure of their personal data to their parents, for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare, unless the School has good reason to conclude otherwise.

Where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the School may

be under an obligation to maintain confidentiality unless, in the School's opinion, there is good reason to do otherwise; for example where the School believes disclosure will be in the best interests of the pupil or other pupils, or if required by law.

14. Data accuracy and security

The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the Bursar of any changes to information held about them.

The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to School systems. All staff and governors will be made aware of this Privacy Notice and their duties under Data Protection Law and receive relevant training.

15. Queries and complaints

Any comments or queries on this Privacy Notice should be directed to the Bursar:

- Email: bursar@cokethorpe.org
- Telephone: 01993 892327

If an individual believes that the School has not complied with this Privacy Notice or acted otherwise than in accordance with Data Protection Law, they should utilise the School complaints procedure and should also notify the Bursar.

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO), which is the UK's supervisory authority for data protection matters. The ICO can be contacted at:

- Website: www.ico.org.uk
- Helpline: 0303 123 1113

16. Training and communication

This notice is published on the School website and is provided to families when pupils join the School and whenever it is materially updated. Staff receive data protection training at induction and at regular intervals so that personal data is handled in accordance with this notice.

17. Monitoring, review and publication

The Bursar keeps this notice under review and updates it whenever the School's processing, the law or authoritative guidance changes, and in any event annually.

18. Related School policies and procedures

This notice should be read in conjunction with the following School policies and procedures:

- Data Protection Policy for Staff
- Staff Privacy Notice
- Guidelines on the Storage and Retention of Records
- CCTV Policy and CCTV and Vehicle (Minibus) Cameras DPIA
- Taking, Using and Storing Images of Children Policy
- Digital Technology Policy
- Complaints Procedure Policy
- Drugs, Alcohol, Smoking and Vaping Policy
- Safeguarding and Child Protection Policy

19. Legislation, regulation and guidance

This notice has regard to the following, in each case the version currently in force:

- The UK General Data Protection Regulation;
- The Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025 (including the complaint-handling duty in force from 19 June 2026);
- Guidance published by the Information Commissioner's Office;
- The Education (Independent School Standards) Regulations 2014; and
- Keeping Children Safe in Education 2026, in force from 1 September 2026, where safeguarding information is concerned.