

# Privacy Notices - UK GDPR Compliant

*These Privacy Notices are based on the Department for Education's model privacy notices for pupils and school workforce. They were written in partnership with Emma Swann, education consultant and approved by Forbes Solicitors. They have been amended to reflect the way we use data at St Bernadette's Catholic Primary School.*

Approved by Full Governing Board April 2018

Amendments approved March 2019

Reviewed by Full Governing Board March 2020, April 2021, April 2022, April 2023, April 2024, April 2025

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# 1. Privacy notice for parents/carers – use of your child’s personal data

Under UK 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 **pupils at our school**.

We, St Bernadette’s Catholic Primary School, Tewkesbury Lane, Milton Keynes, MK10 9PH, are the ‘data controller’ for the purposes of data protection law.

Our data protection officer service is via Judicium Education Ltd. (see ‘Contact us’ below).

## The personal data we hold

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

- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Exclusion information
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Eligibility for free school meals
- Information about your child’s use of our information and communications systems, equipment and facilities (e.g. school computers)

We may also collect, use, store and share (when appropriate) information about your child that falls into “special categories” of more sensitive personal data. This includes, but is not restricted to, information about:

- Any medical conditions we need to be aware of, including physical and mental health
- Photographs and CCTV images captured in school
- Characteristics, such as ethnic background or special educational needs
- Religion

We may also hold data about your child that we have received from other organisations, including other schools and local authorities.

## Why we use this data

We use this data to:

- Support pupil learning

- to assess the quality of our services
- to comply with our responsibilities relating to safeguarding children
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Protect pupil welfare
- Administer admissions to the school, including waiting lists and appeals
- Administer school property
- Carry out research
- Comply with the law regarding data sharing
- Make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely

We will only use your child's personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for any other reason and that reason is incompatible with the original purpose. If we need to use your child's personal information for an unrelated purpose, we will notify you and explain the legal basis that allows us to do so.

Please note that we may process your child's personal information without your knowledge or consent in compliance with the above rules where this is required or permitted by law.

### **Use of your child's personal data in automated decision making and profiling**

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

### **Use of your child's personal data for filtering and monitoring purposes**

While your child is in our school, we may monitor their use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations
- Comply with our policies (e.g. Child Protection Policy, Online and Computer Safety Policy) and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)
- Protect your child's welfare

### **Our lawful basis for using this data**

St Bernadette's Catholic Primary School holds the legal right to collect and use personal data relating to pupils and their families, and we may also receive information regarding them from previous schools, LA and/or the DfE and Northampton Diocese. We collect and use personal data in order to meet legal requirements and legitimate interests set out in the UK GDPR law, including those in relation to the following:

- UK data protection law
- Education Act 1996
- Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013

See <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

We only collect and use pupils' personal data when the law allows us to. Most commonly, we process it where:

- 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.

Consents are sought from parents on admission to the school. If parents subsequently wish to amend these then it is their responsibility to inform the school. Consent forms can be seen at appendix 2 of the school's Data Protection Policy.

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.

### **Our basis for using special category data**

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

We have obtained your explicit consent to use your child's personal data in a certain way

We need to perform or exercise an obligation or right in relation to employment, social security or social protection law

We need to protect an individual's vital interests (i.e. protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent

The data concerned has already been made manifestly public by you

We need to process it for the establishment, exercise or defence of legal claims

We need to process it for reasons of substantial public interest as defined in legislation

We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law

We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law

We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in data protection law. Conditions include:

We have obtained your consent to use it in a specific way

We need to protect an individual's vital interests (i.e. protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent

The data concerned has already been made manifestly public by you

We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights

We need to process it for reasons of substantial public interest as defined in legislation

## Collecting this information

While the majority of information we collect about pupils 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.

Most of the data we hold about your child will come from you, but we may also hold data about your child from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals
- Other schools or trusts
- Department for Education

## How we store this data

We keep personal information about pupils while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations

or to meet our regulatory requirements. Our School Data Compliance Plan (DCP) sets out how long we keep information about pupils.

A copy of the DCP can be requested via the School's Data Protection Officer - See 'Contact Us' below.

We have put in place appropriate security measures to prevent your child's personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your child's personal data securely when we no longer need it.

## Data sharing

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

In cases of emergency data may be shared with organisations that need it, such as the police or ambulance service, if parents cannot be contacted.

The school will not disclose information if there is a court order that prevents the school from doing so.

We share pupils' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

We are required to share information about our pupils with our local authority (LA) and the Department for Education (DfE) under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

We share data with Children's Social Care and other relevant services in order to comply with our statutory duties to carry out inter-agency working to safeguard and promote the welfare of children.

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

As a Catholic School, we are also required to share certain data with the Diocese of Northampton and the Catholic Education Service <http://www.catholiceducation.org.uk/ces-census>

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools> .

Further information regarding the Catholic Education Service Census can be found here:

<http://www.catholiceducation.org.uk/ces-census>

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

- *Milton Keynes Local Authority - to meet our legal obligations to share certain information with it, such as safeguarding concerns, assessment data and exclusions*
- *Schools that your child may attend after leaving us*
- *The Department for Education and other Government departments of agencies*
- *The Catholic Education Service*
- *Youth support services provider*
- *The Diocese of Northampton*
- *The pupil's family and representatives*
- *Educators and examining bodies*
- *Our regulator; Ofsted*
- *Suppliers and service providers - to enable them to provide the service we have contracted them for - eg catering, filtering and monitoring etc*
- *Financial organisations*
- *Central and local government*
- *Our auditors*
- *Survey and research organisations*
- *Health authorities*
- *Security organisations*
- *Health and social welfare organisations*
- *Professional advisers and consultants*
- *Charities and voluntary organisations*
- *Police forces, courts, tribunals*
- *Professional bodies*
- *Secondary school and other school transition meetings*
- *(where appropriate/necessary) external agencies such as Children's Social Care, the Police, Specialist Teaching Service, School Nursing Service, NHS, Educational Psychology, Speech and Language Therapy Service, The Virtual School (for Looked After Pupils),*

### **Sharing data with the Department for Education (DfE)**

The Department for Education (a government department) collects personal data from schools and local authorities via various statutory data collections. We are required to share information about our pupils with the DfE either directly or via our local authority, via various statutory data collections.

The data shared will be in line with the following relevant legislation:

Section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013

The data is transferred securely and held by the Department for Education under a combination of software and hardware controls that meet the current government security policy framework.

The data we share with the DfE is used for a number of purposes, including to:

- Inform funding
- Monitor education policy and school accountability
- Support research

The information shared with the DfE could include:

- Your child's name and address
- Unique pupil numbers
- Pupil matching reference numbers
- Gender or ethnicity
- Details of any special educational needs (SEN)
- Details of schools attended
- Absence and exclusion information
- Information relating to exam results
- Information relating to any contact with children's services
- What they did after they finished school

Please note: this list is not exhaustive.

### **National Pupil Database (NPD)**

We are required to provide information about pupils to the DfE as part of statutory data collections such as the school census [if applicable, add: and early years census].

Some of this information is then stored in the [National Pupil Database](#) (NPD), which is owned and managed by the DfE 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.

The DfE may share information from the NPD with third parties, such as other organisations that promote children's education or wellbeing in England. These third parties must agree to strict terms and conditions about how they will use the data.

For more information, see the DfE's webpage on [how it collects and shares personal data](#).

You can also [contact the Department for Education](#) with any further questions about the NPD.

### **Transferring data internationally**

Where we transfer personal data internationally, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

### **Parents and pupils' rights regarding personal data**

You have a right to make a '**subject access request**' to gain access to personal information that the school holds about your child.

Parents also have the right to make a subject access request with respect to any personal data the school holds about them.

If you make a subject access request, and if we do hold information about you or your child, we will (subject to any exemptions that apply):

- 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

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 (DPO):

### **Your right to access your child's educational record**

Parents, or those with parental responsibility, also have the right to access their child's **educational record** (which includes most information about a pupil). This right applies as long as the pupil is aged under 18.

There are certain circumstances in which this right can be denied, such as if releasing the information might cause serious harm to the physical or mental health of the pupil or another individual, or if it would mean releasing exam marks before they are officially announced

To request access, please contact Mrs Delaney, School Business Manager:

[DelaneyR@stbernadettesschool.com](mailto:DelaneyR@stbernadettesschool.com)

### **Other rights regarding your child's data**

Under UK data protection law, you have certain rights regarding how your child's personal data is used and kept safe. For example, you have the right to:

- Object to our use of your child's personal data
- Object to the processing of your child's personal data that is likely to cause, or is causing, damage or distress
- Prevent your child's data being used to send direct marketing
- Object to and challenge the use of your child's 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 or blocked
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your child's personal data for a specific purpose
- In certain circumstances, have the personal data we hold about your child deleted or destroyed, or restrict its processing
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:

Your right to have all personal data deleted or destroyed doesn't apply when the lawful basis for processing is legal obligation or public task

Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests

Right to object to use of your private data doesn't apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent

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

## 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.

To make a complaint, please contact our data protection officer (DPO) service

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## 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 service(DPO)**:

Please find below details of the School's Data Protection Officer: -

Data Protection Officer: Judicium Consulting Limited

Address: 5<sup>th</sup> Floor, 98 Theobalds Road, London, WC1X 8WB

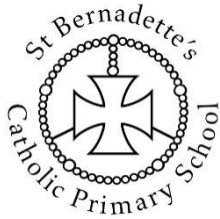
Email: [dataservices@judicium.com](mailto:dataservices@judicium.com)

Web: [www.judiciumeducation.co.uk](http://www.judiciumeducation.co.uk)

Telephone: 0345 548 7000 option 1 then option 1 again

However, **our data protection lead** has day-to-day responsibility for data protection issues in our school.

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact them: [DelaneyR@stbernadettesschool.com](mailto:DelaneyR@stbernadettesschool.com)



## 2. Privacy notice for staff

Under UK 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. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time but if we do so, we will provide you with an updated copy as soon as reasonably practical.

We, St Bernadette's Catholic Primary School, Tewkesbury Lane, Milton Keynes, MK10 9PH, are the 'data controller' for the purposes of data protection law.

Our data protection officer service is via Judicium Education Ltd. (see 'Contact us' below).

We will comply with the data protection law and principles, which means that your data will be:

Used lawfully, fairly and in a transparent way

Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes

Relevant to the purposes we have told you about and limited only to those purposes

Accurate and kept up to date

Kept only as long as necessary for the purposes we have told you about

Kept securely

### 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:

- Your name
- 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 an application form 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 license
- Information about your use of our information and communications systems, equipment and facilities (e.g. school computers)

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- Any health conditions you have that we need to be aware of
- Sickness records
- Religion
- Ethnic background
- Photographs and CCTV images captured in school
- Trade union membership

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

### **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
- Check your entitlement to work in the UK
- Determine the terms on which you work for us
- 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 equalities monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body
- Make sure our information and communications systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely
- Ascertain your fitness to work
- Manage sickness absence

If you fail to provide certain information when requested, we may not be able to perform the contract we have entered into with you (such as paying you or providing a benefit), or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

We will only use your personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law

### **Use of your personal data for marketing purposes**

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

### **Use of your personal data in automated decision making and profiling**

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

### **Use of your personal data for filtering and monitoring purposes**

While you're in our school, we may monitor your use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations
- Comply with our policies (e.g. Child Protection Policy, Internet and Computer Safety Policy) and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)
- Protect your welfare

### **Our lawful basis for using this data**

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need 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.

### **Our basis for using special category data**

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

We have obtained your explicit consent to use your personal data in a certain way

We need to perform or exercise an obligation or right in relation to employment, social security or social protection law

We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent

The data concerned has already been made manifestly public by you

We need to process it for the establishment, exercise or defence of legal claims

We need to process it for reasons of substantial public interest as defined in legislation

We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law

We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law

We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in data protection law. Conditions include:

We have obtained your consent to use it in a specific way

We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent

The data concerned has already been made manifestly public by you

We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights

We need to process it for reasons of substantial public interest as defined in legislation

## **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.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals

## **How we store this data**

We keep personal information about you while you work at our school. We may also keep it beyond your employment at our school if this is necessary. Our Data Compliance Plan sets out how long we keep information about staff.

A copy of the DCP can be requested via the School's Data Protection Officer - See 'Contact Us' below.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it.

## **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.

In cases of emergency data may be given to organisations that need it, such as the police or ambulance service, if next of kin cannot be contacted.

Where it is legally required, or necessary (and it complies with UK data protection law) we may share personal information about you with:

- *Milton Keynes local authority - to meet our legal obligations to share certain information with it, such as safeguarding concerns, information about headteacher performance and staff dismissals*
- *The Department for Education and other Government departments or agencies*
- *Your family or representatives*
- *Educators and examining bodies*
- *Our regulator, Ofsted*
- *The Catholic Education Service and Diocese of Northampton*
- *Suppliers and service providers - to enable them to provide the service we have contracted them for, such as payroll and HR*
- *Financial organisations*
- *Central and local government*
- *Our auditors*
- *Survey and research organisations*
- *Trade unions and associations*
- *Health authorities*
- *Security organisations*
- *Health and social welfare organisations*
- *Professional advisers and consultants*
- *Charities and voluntary organisations*
- *Police forces, courts, tribunals*
- *Professional bodies*
- *Employment and recruitment agencies*

### **Transferring data internationally**

Where we transfer personal data internationally, we will do so in accordance with UK data protection law. In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

### **Your rights**

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

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

If you make a subject access request, 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
- 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

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 UK data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

Object to our use of your personal data

Prevent your data being used to send direct marketing

Object to and challenge 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

In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing

Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose

In certain circumstances, be notified of a data breach

Make a complaint to the Information Commissioner's Office

Claim compensation for damages caused by a breach of the data protection regulations

We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:

Your right to have all personal data deleted or destroyed doesn't apply when the lawful basis for processing is legal obligation or public task

Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests

Right to object to use of your private data doesn't apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent

To exercise any of these rights, please contact us (see 'Contact us' below).

### **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.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113

- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## 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 service(DPO)**:

Please find below details of the School's Data Protection Officer: -

Data Protection Officer: Judicium Consulting Limited

Address: 5<sup>th</sup> Floor, 98 Theobalds Road, London, WC1X 8WB

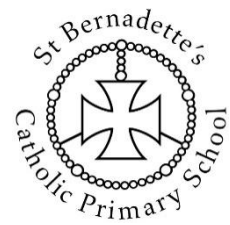
Email: [dataservices@judicium.com](mailto:dataservices@judicium.com)

Web: [www.judiciumeducation.co.uk](http://www.judiciumeducation.co.uk)

Telephone: 0345 548 7000 option 1 then option 1 again

However, **our data protection lead** has day-to-day responsibility for data protection issues in our school.

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact them: [DelaneyR@stbernadettesschool.com](mailto:DelaneyR@stbernadettesschool.com)



# 3. Privacy notice for parents - use of your personal data

## 1. Introduction

Under UK data protection law, individuals have a right to be informed about how our 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 and carers of pupils at our school**.

We, St Bernadette's Catholic Primary School are the 'data controller' for the purposes of UK data protection law.

## 2. The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details and contact preferences (such as your name, address, email address and telephone numbers)

- Bank details

- Details of your family circumstances

- Details of any safeguarding information including court orders or professional involvement

- Records of your correspondence and contact with us

- Details of any complaints you have made

- Information about your use of our information and communication systems, equipment and facilities (e.g. school computers)

We may also collect, use, store and share (when appropriate) information about you that falls into 'special categories' of more sensitive personal data. This includes, but is not restricted to:

- Information about any health conditions you have that we need to be aware of

- Photographs and CCTV images captured in school

- Information about your religion, as part of our admissions arrangements

We may also hold data about you that we have received from other organisations, including other schools and local authorities.

## 3. Why we use this data

We collect and use the data listed above to:

- Report to you on your child's attainment and progress
- Keep you informed about the running of the school (such as emergency closures) and events
- Process payments for school services and clubs
- Provide appropriate pastoral care

- e) Protect pupil welfare
- f) Administer admissions waiting lists
- g) Assess the quality of our services
- h) Carry out research
- i) Comply with our legal and statutory obligations
- j) Make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely

We will only use your personal information for the purposes for which we have collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **3.1 Use of your personal data for marketing purposes**

Where you have given us consent to do so, we may send you marketing information by email promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails at any time by selecting the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

### **3.2 Use of your personal data in automated decision-making and profiling**

We do not currently process any parents' or carers' personal data through automated decision-making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

### **3.3 Use of your personal data for filtering and monitoring purposes**

While you're in our school, we may monitor your use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations
- Comply with our policies (e.g. child protection policy, IT acceptable use policy) and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)
- Protect your child's welfare

## **4. Our lawful basis for using this data**

St Bernadette's Catholic Primary School holds the legal right to collect and use personal data relating to pupils and their families, and we may also receive information regarding them from previous schools, LA and/or the DfE and Northampton Diocese. We collect and use personal data in order to meet legal requirements and legitimate interests set out in the UK GDPR law, including those in relation to the following:

- UK data protection law
- Education Act 1996

- Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013

See <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

We only collect and use parent personal data when the law allows us to. Most commonly, we process it where:

- 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 your 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 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.

Consents are sought from parents on admission to the school. If parents subsequently wish to amend these then it is their responsibility to inform the school. Consent forms can be seen at appendix 2 of the school's Data Protection Policy.

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.

#### 4.1 Our basis for using special category data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and 1 of the following conditions for processing as set out in UK data protection law:

We have obtained your explicit consent to use your personal data in a certain way

We need to perform or exercise an obligation or right in relation to employment, social security or social protection law

We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent

The data concerned has already been made manifestly public by you

We need to process it for the establishment, exercise or defence of legal claims

We need to process it for reasons of substantial public interest as defined in legislation

We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law

We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law

We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

We have obtained your consent to use it in a specific way

We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent

The data concerned has already been made manifestly public by you

We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights

We need to process it for reasons of substantial public interest as defined in legislation

## 5. Collecting this data

We will only collect and use your data when the law allows us to (as detailed above in section 4 of this notice). While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

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.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Your children
- Police forces, courts or tribunals
- Other schools and trusts

## 6. How we store this data

We keep personal information about you while your child is attending our school. We may also keep it beyond their attendance at our school if this is necessary to comply with our legal obligations or to meet our regulatory requirements. Our record retention schedule sets out how long we keep information about parents and carers.

We have put in place appropriate security measures to prevent your personal information being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer have a legal requirement to retain it.

## 7. Who we share data with

We do not share information about you 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 UK data protection law), we may share personal information about you with:

- Our local authority, Milton Keynes City Council - to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions
- Government departments or agencies
- Department for Education
- Our regulator, [e.g. Ofsted]
- Suppliers and service providers: e.g. catering, HR, filtering and monitoring
- Financial organisations
- Our auditors
- Survey and research organisations

Health authorities  
Security organisations  
Health and social welfare organisations  
Professional advisers and consultants  
Charities and voluntary organisations  
Police forces, courts, tribunals

## 7.1 Transferring data internationally

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

## 8. Your rights

### 8.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- Give you a description of it
- Tell you why we are holding it, how we are processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- 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

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 us (see 'Contact us' below).

### 8.2 Your other rights regarding your data

Under data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data where it is likely to cause, or is causing damage or distress
- Prevent your data being used to send direct marketing
- Object to and challenge 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 or blocked
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose

In certain circumstances, be notified of a data breach

Make a complaint to the Information Commissioner's Office

Claim compensation for damages caused by a breach of the data protection regulations

We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:

Your right to have all personal data deleted or destroyed doesn't apply when the lawful basis for processing is legal obligation or public task

Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests

Right to object to use of your private data doesn't apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent

See information on types of lawful basis in section 4 of this privacy notice.

To exercise any of these rights, please contact us (see 'Contact us' below).

## 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 - please see 'Contact us' section below.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## 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 service(DPO)**:

Please find below details of the School's Data Protection Officer: -

Data Protection Officer: Judicium Consulting Limited

Address: 5<sup>th</sup> Floor, 98 Theobalds Road, London, WC1X 8WB

Email: [dataservices@judicium.com](mailto:dataservices@judicium.com)

Web: [www.judiciumeducation.co.uk](http://www.judiciumeducation.co.uk)

Telephone: 0345 548 7000 option 1 then option 1 again

However, **our data protection lead** has day-to-day responsibility for data protection issues in our school.

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact them: [DelaneyR@stbernadettesschool.com](mailto:DelaneyR@stbernadettesschool.com)