Parent Privacy Notice

What is the purpose of this document?

Our Lady of Lourdes RC Primary School Our Trust collects data and information about parents / carers of our pupils so that we can operate effectively as a trust. This privacy notice explains how and why we collect parent / carer data, what we do with it and what rights parents have.

Our Lady of Lourdes RC Primary School is a school within the St Teresa of Calcutta Catholic Academy Trust ("the Trust")

The Trust is the Data Controller for all the schools within the Trust. The Trust's registered office is St Teresa of Calcutta Catholic Academy Trust, Imperial House, Hornby Street, Bury, BL9 5BN.

The Data Protection Officer for the Trust is Jenny Bonson, contactable via dpo@stoccat.org.uk

The term parent is widely defined in education law to include the natural or adoptive parents (regardless of whether parents are or were married, whether a father is named on a birth certificate or has parental responsibility for the pupil, with whom the pupil lives or whether the pupil has contact with that parent), and also includes non-parents who have parental responsibility for the pupil, or with whom the pupil lives. It is therefore possible for a pupil to have several "parents" for the purposes of education law. This privacy notice also covers other members of pupils' families who we may process data about from time to time, including, for example, siblings, aunts and uncles and grandparents.

Why do we collect and use parent / carer information?

In compliance with Article 6 of the GDPR, we collect and use parent/carer information under the following lawful bases:

a) Where we have the consent of the data subject;
b) Where it is necessary for compliance with a legal obligation;
c) Where processing is necessary to protect the vital interests of the data subject or another person;
d) Where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

In compliance with Article 9 of the GDPR, where the personal data we collect is special category data, such as ethnic origin, religious beliefs and health conditions, we will identify a lawful basis for the processing of such data (as listed within Article 6) and an appropriate special category condition for the processing of the data (as listed within Article 9).

When processing special category data, we will meet at least one of the conditions below:

a) Explicit consent is gained;
b) It is in the interest of employment, social security and social protection;
c) It is in your vital interests;
d) It involves a not-for-profit body;
e) The data is made public by yourself;
f) It is in relation to legal claims or judicial acts;
g) It is in substantial public interest;
h) It is in the interest of health or social care;
i) It is in the interest of public health;
j) It is for the purpose of archiving, research and statistics.

We use the parent/carer data to support our functions of running a school, in particular:

a. to decide who to admit to the school;
b. to maintain a waiting list;
c. to support pupil learning;

d. to monitor and report on pupil progress;
e. to provide appropriate pastoral care;
f. to assess the quality of our services;
g. to comply with the law regarding data sharing;
h. for the protection and welfare of pupils and others in the school, including our safeguarding/child protection obligations;
i. for the safe and orderly running of the school;
j. to promote the school;
k. to send you communications that may be of interest to you which may include information about school events or activities, news, campaigns, appeals, other fundraising activities;
l. in order to respond to investigations from our regulators or to respond to complaints raised by our stakeholders;
m. in connection with any legal proceedings threatened or commenced against the school.

The categories of parent / carer information that we collect, hold and share include:

a. Personal information (such as name, address, telephone number and email address);
b. Information relating to your identity, marital status, employment status, language, nationality, country of birth and free school meal / pupil premium eligibility / entitlement to certain benefits

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions
- Information about your health, including any medical condition, health and sickness records
- Genetic information and biometric data
- Information about your criminal record (including court orders in place affecting parenting arrangements for pupils);
- Disability and access requirements

This information is not routinely collected about parents/carers and is only likely to be processed by the school in specific circumstances relating to particular pupils, for example, if a child protection issue arises or if a parent/carer is involved in a criminal matter. Where appropriate, such information may be shared with external agencies such as the child protection team at the Local Authority, the Local Authority Designated Officer and/or the Police. Such information will only be processed to the extent that it is lawful to do so and appropriate measures will be taken to keep the data secure.

We collect information about parents/carers before pupils join the school and update it during pupils' time on the roll as and when new information is acquired.

Collecting parent/carer information

Whilst the majority of information about parents / carers provided to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain parent / carer information to us or if you have a choice in this. Where appropriate, we will ask parents / carers for consent to process personal data where there is no other lawful basis for processing it, for example where we wish to ask your permission to use your information for marketing purposes or to request voluntary contributions. Parents / carers may withdraw consent given in these circumstances at any time.

In addition, the School also uses CCTV cameras around the school site for security purposes and for the protection of staff and pupils. CCTV footage may be referred to during the course of disciplinary procedures (for staff or pupils) or to investigate other issues. CCTV footage involving parents / carers will only be processed to the extent that it is lawful to do so. Please see our CCTV policy for more details.

Storing parent/carer data

A significant amount of personal data is stored electronically, for example, on our database, SIMS/Bromcom/Other. Some information may also be stored in hard copy format.

Data stored electronically may be saved on a cloud based system which may be hosted in a different country.

Personal data may be transferred to other countries if, for example, we are arranging a school trip to a different country. Appropriate steps will be taken to keep the data secure.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, insurance or reporting requirements. Details of retention periods for different aspects of your personal information are available in our Data Retention Policy. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a parent/carer of a child at the school we will retain and securely destroy your personal information in accordance with our Data Retention Policy or applicable laws and regulations.

Storing particularly sensitive personal information

We may hold/use your particularly sensitive personal information in the following ways:

- We may hold/use information about your race, nationality or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We may hold/use information about your criminal record (including court orders in place affecting parenting arrangements for pupils) to ensure that we comply with child protection/safeguarding laws.
- Information about your health, including any medical condition, health and sickness records and disability access requirements to offer any appropriate adjustments, to comply with the Equality Act 2010.

Who do we share parent/carer information with?

We routinely share parent/carer information with:

- schools that pupils attend after leaving us;

From time to time, we may also share parent/carer information other third parties including the following:

- our local authority;
- a pupil's home local authority (if different);
- the Department for Education (DfE);
- school governors/Trustees;
- the central team at the Trust;
- the Police and law enforcement agencies;
- NHS health professionals including the school nurse, educational psychologists,
- Education Welfare Officers;
- Courts, if ordered to do so;
- the Teaching Regulation Authority;
- Prevent teams in accordance with the Prevent Duty on schools;

- other schools, for example, if we are negotiating a managed move and we have your consent to share information in these circumstances;
- UCAS
- our legal advisors;
- our insurance providers/the Risk Protection Arrangement;

Some of the organisations referred to above are joint data controllers. This means we are all responsible to you for how we process your data.

In the event that we share personal data about parents/carers with third parties, we will provide the minimum amount of personal data necessary to fulfil the purpose for which we are required to share the data.

Requesting access to your personal data

Under data protection legislation, parents have the right to request access to information about them, and where appropriate their child, that we hold ("Subject Access Request"). From the age of 13, we generally regard pupils as having the capacity to exercise their own rights in relation to their personal data. This means that where we consider a pupil to have sufficient maturity to understand their own rights, we will require a Subject Access Request to be made by the pupil and not their parent(s) on their behalf. This does not affect any separate statutory right parents might have to access information about their child.

Requests for data about either yourself or your child should be made in writing to the school, or where appropriate the Trust. Any written request for personal data will be treated as a Subject Access Request. These requests will be addressed by the school's Data Protection Lead, in conjunction with the Trust's DPO as necessary.

The legal timescales for the School to respond to a Subject Access Request is one calendar month. As the School has limited staff resources outside of term time, we encourage parents/pupils to submit Subject Access Requests during term time and to avoid sending a request during periods when the School is closed or is about to close for the holidays where possible. This will assist us in responding to your request as promptly as possible. Where the school or Trust believe they will be unable to respond to requests within the given timeframe, the requester will be contacted regarding any potential delays. For further information about how we handle Subject Access Requests, please see our Data Protection Policy.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of our data protection responsibilities.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Data protection officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

You can contact the Information Commissioners Office on 0303 123 1113 or via email https://ico.org.uk/global/contact-us/email/ or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact the DPO via dpo@stoccat.org.uk