

Privacy Notice for Parents and Carers



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1. Introduction

Under UK data protection law, individuals have a right to be informed about how our Trust 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 and their parents/carers at our schools.

This privacy notice applies while we believe your child is not capable of understanding and exercising their own data protection rights.

Once your child is able to understand their rights over their own data (generally considered to be age 12, but this has to be considered on a case-by-case basis), you should instead refer to our privacy notice for pupils to see what rights they have over their own personal data

Our trust,

St Thomas Aquinas Catholic Multi-Academy Trust
Unit 5, Charnwood Edge Business Park,
Cossington,
LE7 4UZ
0116 2968171

is the 'data controller' for the purposes of UK data protection law.

Our data protection officer is Antoinette Bouwens (see 'Contact us' below).

2. The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about your child 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

We may also collect, use, store and share (when appropriate) information about you and 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, as part of our admission arrangements

We may also hold data about you or your child that we have received from other organisations, including other schools and social services.

3. Why we use your personal data

We use the data listed above to:

- a) Support pupil learning
- b) Monitor and report on pupil progress
- c) Keep you informed about the running of the school (such as emergency closures) and events
- d) Process payments for school services and clubs
- e) Provide appropriate pastoral care
- f) Protect pupil welfare
- g) Assess the quality of our services
- h) Administer admissions waiting lists
- i) Carry out research
- j) Comply with the law regarding data sharing

3.1 Use of your child's personal data for marketing purposes

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

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).

3.2 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.

4. Our lawful basis for using this data

Our lawful bases for processing your personal information for the reasons listed in section 3 above are:

Legal Obligation under article 6(1)(C) of the Data Protection Act 2018

For example:

- The School/Trust might need to use your information to report a concern about your child's wellbeing to Children's Services. We will also have to disclose your information to third parties such as the courts, the local authority, Department for Education or the police where legally obliged to do so.
- To enable secure and regulated access to our services such as the Library, catering facilities, trip management and school resources. This includes the processing of biometric data.

Vital interests' under article 6(1)(D) of the Data Protection Act 2018

For example:

- We process your child's contact information in an emergency when it is in your best interests for us to do so (e.g. if you were seriously hurt).
- We process your and other authorised adults contact information in an emergency when it is in your best interests for us to do so (e.g. if you or they were seriously hurt).

Public interest under article 6(1)(E) of the Data Protection Act 2018

For example:

- Providing your child and others with an education
- Safeguarding and looking after your welfare and development, and the welfare and development of others. This includes equal opportunities monitoring and includes the use of your biometric data;
- Ensuring the security of the Trust's site and data which involves different forms of CCTV, photos and video recording (biometric data);
- Facilitating the efficient operation of the Trust.
- Ensuring that we comply with all our legal obligations

Legitimate Interest under article 6(1)(F) of the Data Protection Act 2018

For example:

- To support the smooth running of the school and the appropriate deployment of staff;
- The use of biometric data to identify you as a registered student, for example, on your ID card and in our management information system;
- The use of biometric data to identify you in critical communications around medical conditions and medical treatment, and in appropriate pastoral interventions;
- The use of biometric data to look after your welfare, and the welfare of others by, where deemed necessary, by monitoring activities through CCTV and surveillance technology.

Where you have provided us with consent to use your child's data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

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 one of the following conditions for processing as set out in data protection law:

- We have obtained your explicit consent to use your or 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

5. Collecting this data

While the majority of information we collect about your child 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 or your child will come from you, but we may also hold data about your child from:

- Local authorities
- Government departments or agencies

- Your children
- Police forces, courts, tribunals

6. How we store this data

We keep personal information about you or your child while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary. Our record retention schedule sets out how long we keep information about pupils.

A copy of the retention policy is held on the Trust website: <https://www.aquinas-cmat.org>

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.

7. Who we share data with

We do not share information about your child with any third party without consent unless the law and our policies allow us to do so.

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

- Schools and/or post-16 provision that the pupil attends after leaving us this includes assessment information and relevant safeguarding information
- Government departments or agencies
- Local authorities, to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions
- Our regulator (Ofsted)
- Suppliers and service providers (e.g. IT, catering and other services)
- Professional advisers and consultants
- NHS Trust for delivery of child health services, such as inoculation programmes and school nurses. They also use information about pupils for data research and statistical purposes.
- NHS Digital for analysing and presenting a range of health & social care data, including height and weight of pupils
- Education Skills Funding Agency (ESFA) and Learning Records Service (LRS)
- Charities and voluntary organisations
- Police forces, courts and tribunals

7.1 Transferring data internationally

We may share personal information about your child with the following international third parties

We may share personal information about with international third parties, where different data protection legislation applies.

Where we transfer your or your child 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 or your child

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

If you make a subject access request, and if we do hold information about 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
- 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

If you would like to make a request, please contact us (see 'Contact us' below).

Once your child is able to understand their rights over their own data (generally considered to be age 12, but this has to be considered on a case-by-case basis), we will need to obtain consent from your child for you to make a subject access request on their behalf.

8.2 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 make a request, please contact Antoinette Bouwens (see under section 10 Contact us).

8.3 Your other rights regarding your child's data

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

- Object to our use of your or your child's personal data
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about you or your child deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of personal data for a specific purpose
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

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

Once your child is able to understand their rights over their own data (generally considered to be age 12, but this has to be considered on a case-by-case basis), we will need to obtain consent from your child for you to make these requests on their behalf.

9. 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.

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

10. 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**:

Antoinette Bouwens

abouwens@aquinas-cmat.org

0116 296 8171