



Data Protection Policy incorporating the Freedom of Information Publication Scheme and Privacy Notice

Policy Reference:	DP1 - F
Responsibility:	FGB
Designation:	Statutory
Reviewed by:	V Ryan
This Review:	March 2025
Next Review Due:	March 2026
Cycle:	Annual
Ratified by Full Governing Body on:	31 st March 2025
Signed:	G Owens
Mr G Owens	Chair of Governors

***At our school, with Jesus in
our hearts, we have:***

***The passion to learn;
The courage to fail; The
strength to love.***

***With Christ as our guide and
example we celebrate the
uniqueness of the individual.***

***Together we will try to:
Learn from Jesus;
Love like Jesus;
Live like Jesus.***

Purpose

This policy sets out how the federation deals with personal information correctly and securely and in accordance with the UK GDPR, and other related legislation.

This policy applies to all personal information however it is collected, used, recorded and stored by the federation and whether it is held on paper or electronically.

Data Protection

The federation collects and uses personal information (referred to in the UK General Data Protection Regulation (UK GDPR) as personal data) about staff, pupils, parents and other individuals who come into contact with the school. This information is gathered in order to enable the provision of education and other associated functions. In addition, either school may be required by law to collect, use and share certain information.

Each school is the Data Controller of the personal data that it collects and receives for these purposes.

The federation has a Data Protection Officer, who may be contacted via the school office.

Both schools issue Privacy Notices (also known as a Fair Processing Notices) to all pupils/parents and staff. These summarise the personal information held about pupils and staff, the purpose for which it is held and who it may be shared with. It also provides information about an individual's rights in respect of their personal data

What is Personal Information/ data?

Personal information or data means any information relating to an identified or identifiable individual. An identifiable individual is one who can be identified, directly or indirectly by reference to details such as a name, an identification number, location data, an online identifier or by their physical, physiological, genetic, mental, economic, cultural or social identity. Personal data includes (but is not limited to) an individual's, name, address, date of birth, photograph, bank details and other information that identifies them.

Data Protection Principles

The UK GDPR establishes six principles as well as a number of additional duties that must be adhered to at all times:

1. Personal data shall be processed lawfully, fairly and in a transparent manner
2. Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (subject to exceptions for specific archiving purposes)
3. Personal data shall be adequate, relevant and limited to what is necessary to the purposes for which they are processed and not excessive;
4. Personal data shall be accurate and where necessary, kept up to date;
5. Personal data shall be kept in a form that permits the identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
6. Personal data shall be processed in a manner that ensures appropriate security of the personal

Duties

Personal data shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of data protection.

Data Controllers have a General Duty of accountability for personal data.

Commitment

The federation is committed to maintaining the principles and duties in the UK GDPR at all times. Therefore, each school will:

- Inform individuals of the identity and contact details of the data controller
- Inform individuals of the contact details of the Data Protection Officer
- Inform individuals of the purposes that personal information is being collected and the basis for this
- Inform individuals when their information is shared, and why and with whom unless the UK GDPR provides a reason not to do this.
- If either school plans to transfer personal data outside the EEA the school will inform individuals and provide them with details of where they can obtain details of the safeguards for that information
- Inform individuals of their data subject rights
- Inform individuals that the individual may withdraw consent (where relevant) and that if consent is withdrawn that the relevant school will cease processing their data although that will not affect the legality of data processed up until that point.
- Provide details of the length of time an individual's data will be kept
- Should either school decide to use an individual's personal data for a different reason to that for which it was originally collected the school shall inform the individual and where necessary seek consent
- Check the accuracy of the information it holds and review it at regular intervals.
- Ensure that only authorised personnel have access to the personal information whatever medium (paper or electronic) it is stored in.
- Ensure that clear and robust safeguards are in place to ensure personal information is kept securely and to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded.
- Ensure that personal information is not retained longer than it is needed.
- Ensure that when information is destroyed that it is done so appropriately and securely.
- Share personal information with others only when it is legally appropriate to do so.
- Comply with the duty to respond to requests for access to personal information (known as Subject Access Requests)
- Ensure that personal information is not transferred outside the EEA without the appropriate safeguards
- Ensure that all staff and governors are aware of and understand these policies and procedures.

Biometric Data

The federation holds no biometric data.

Complaints

Complaints will be dealt with in accordance with the federation's complaints policy. Complaints relating to the handling of personal information may be referred to the Information Commissioner who can be contacted at Wycliffe House, Water Lane Wilmslow Cheshire SK9 5AF or at www.ico.gov.uk

Review

This policy will be reviewed annually or when it is deemed appropriate. The policy review will be undertaken by the Data Protection Officer or Headteacher.

Contacts

If you have any enquires in relation to this policy, please contact Miss V Ryan who will also act as the contact point for any subject access requests.

The Federation of St Bernadette's and St. Patrick's Catholic Primary Schools

Information to be published	How the information can be obtained	Cost
Class 1 - Who we are and what we do Headteacher: Mrs Alison Tong St Patricks Catholic Primary School, Whitefriars Avenue Road Farnborough Hampshire GU14 7BW Headteacher Mr Peter Lynch St Bernadette's Catholic Primary School Tile Barn Close Farnborough Hampshire GU14 8LS Chair of Governors: Mr Gerard Owens T: 01252 542511 / 01252 548123 E: enquiries@st-patricks.hants.sch.uk / adminoffice@st-bernadettes.hants.sch.uk W: www.st-patricks.hants.sch.uk / www.st-bernadettes.hants.sch.uk	Information about our schools can be found on the school website: www.st-patricks.hants.sch.uk, or at https://www.hants.gov.uk/educationandlearning/findaschool/schooldetails?dfesno=3551 or at https://get-information-schools.service.gov.uk/Establishments/Establishment/Details/116390 www.st-bernadettes.hants.sch.uk or at https://www.hants.gov.uk/educationandlearning/findaschool/schooldetails?dfesno=3553 or at https://get-information-schools.service.gov.uk/Establishments/Establishment/Details/116391	
Who's who in the school	A full list of staff and their roles in school can be found on the school website.	
Who's who on the Governing Body and the basis of their appointment	A full breakdown of Governors at the school can be found on the school website, on the Get Information About Schools website / by application at the school office. This list details the type of appointment and term of office. All Governors can be contacted via the school office (contact details above).	
Instrument of Government	A copy of the Instrument of Government can be found by application at the school office. This records the constitution of the school in accordance with school governance regulations.	
School Information (England) (Amendment) Regulation 2012	The following information is published on the school website: ➤ Admission Arrangements ➤ Link to recent Ofsted Reports ➤ Most recent KS1 & KS2 results and links to other performance data	

	➤ Information about the curriculum and subject curriculum content ➤ School's Pupil Premium allocation, spend and its impact ➤ Policies relating to Behaviour, SEN, disability and charging	
Contact details for the Head teacher and for the Governing Body (named contacts where possible with telephone number and email address)	See above	
School prospectus	A copy of the school prospectus can be found on the school website.	
Staffing structure	This can be found by application at the school office and on the school website.	
School session times and term dates	Details of school holiday dates can be found by application at the school office or at http://www3.hants.gov.uk/education/schools/schoolholidays	

Class 2 – What we spend and how we spend it (Financial information relating to projected and actual income and expenditure, procurement, contracts and financial audit) Current and previous financial year as a minimum	Financial information about projected and actual income and expenditure, procurement, contracts and financial audit can be found by application at the school office.	
Annual budget plan and financial statements	Details of the Individual School's Budget is distributed by the Local Authority and the school's annual income and expenditure returns can be found in Governors' minutes by application at the school office.	
Capital funding	Details of the capital funding allocated to the school together with information on related building projects and other capital projects can be found by application at the school office.	
Additional funding	Income generation schemes and other sources of funding can be found by application at the school office.	
Procurement and projects Details of procedures used for the acquisition of goods and services	Details of contracts that have gone through a formal tendering process can be found by application at the school office in the Governors' minutes.	
Pay policy	The statement of the school's policy and procedures regarding teachers' pay can be found by application at the school office.	
Staffing and grading structure	Details of the staffing structure can be found by application at the school office.	

Governors' allowances	Details of allowances and expenses that can be claimed or incurred can be found by application at the school office.	
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Class 3 – What our priorities are and how we are doing (Strategies and plans, performance indicators, audits, inspections and reviews) Current information as a minimum.	The Governing Body papers and the school strategic plan can be found by application at the school office.	
Government supplied performance data	A link to the Ofsted Data Dashboard is available via the school website.	
The latest Ofsted reports and letters to children	Copies of Ofsted Inspections (whole school inspections and subject inspections) can be obtained from the Ofsted website. http://www.ofsted.gov.uk/inspection-reports/find-inspection-report/provider/ELS/116390 https://reports.ofsted.gov.uk/provider/21/116391	
Performance management policy and procedures adopted by the Governing Body.	Performance management policy and procedures adopted by the Governing Body can be read on application at the school office.	
Schools future plans	The school's future plans can be found in the School Strategic Development Plan upon application from the school office.	
Safeguarding policies and procedures	Policies and procedures in place to ensure that functions are exercised with a view to safeguarding and promoting the welfare of children in compliance with any guidance issued by the Secretary of State can be found by application at the school office.	

Class 4 – How we make decisions (Decision making processes and records of decisions) Current and previous three years as a minimum	The Governing Body papers can be found by application at the school office. These demonstrate the decision making processes adopted by the school.	
Admissions policy / decisions (not individual admission decisions)	The Admission Arrangements can be found by application at the school office and on the school website.	

Agendas of meetings of the Governing Body and its sub-committees	Minutes, agendas and associated papers can be found by application at the school office.	
Minutes of meetings (as above) –N.B. this will exclude information that is properly regarded as private to the meetings	Minutes, agendas and associated papers can be found by application at the school office.	

Class 5 – Our policies and procedures (Current written protocols, policies and procedures for delivering our services and responsibilities). Current information only	Current written protocols, policies and procedures can be found by application at the school office with some also on the school website. Policies are regularly updated according to the Governing Body and school schedule.	
School policies including: ➤ Charging ➤ Health and Safety ➤ Complaints procedure ➤ Equality ➤ Child Protection ➤ Safeguarding ➤ ICT Acceptable Use	Current school policies can be found by application at the school office and most are on the website. The Governing Body adopts Hampshire County Council Manual of Personnel Practice and Diocesan Staff Grievance Procedure (to include: employment, contracts, safe recruitment practice, and health)	
Pupil and curriculum policies, including: ➤ Home-school agreement ➤ Personal, Social, Health and Citizenship ➤ Special Educational Needs ➤ Accessibility ➤ Religious Education and Collective worship ➤ Pupil Behaviour	Current school policies can be found by application at the school office and most are on the website.	
Records management and personal data policies, including: ➤ Information security policies ➤ Records retention destruction and archive policies ➤ Data protection (including information sharing policies)	Current school policies can be found by application at the school office and most are on the website.	

Class 6 – Lists and Registers Currently maintained lists and registers only (Arbor)	These are held by the school office.	
Curriculum circulars and statutory instruments	Statutory instruments (for example Regulations), departmental circulars and administrative memoranda sent to the Headteacher / Governing Body concerning the curriculum are held by the school office.	
Asset register	An Asset Register is maintained by the school and held by the school office.	

Class 7 – The services we offer Information about the services we offer, including leaflets, guidance and newsletters produced for the public and businesses Current information only	Information about the services we offer can be found on the school website and by application to the school office.	
Extra-curricular activities :	Information can be obtained from the school office and the website.	
Out of school clubs	Information can be obtained from the school office or on the school website.	
School publications	By application at the school office and the on the school website.	
Services for which the school is entitled to recover a fee, together with those fees, ie clubs, peripatetic music, trips.	Available on application at the school office, on the school website and in the school prospectus.	
Leaflets books and newsletters	Available on application at the school office and the website.	

Schedule of charges:

This describes how the charges have been arrived at and should be published as part of the guide.

TYPE OF CHARGE	DESCRIPTION	BASIS OF CHARGE
Disbursement cost	Photocopying/printing @ .1.p per sheet (black & white)	Actual cost
	Photocopying/printing @ 5..p per sheet (colour)	Actual cost
	Postage	Actual cost of Royal Mail standard 2 nd class
Statutory Fee		In accordance with the relevant legislation.

* the actual cost incurred by the public authority.

The Federation of St Bernadette's and St. Patrick's Catholic Primary Schools

Privacy Notice (How we use personal information)

Why do we collect and use personal information?

We collect and use personal information:

- to fulfil statutory responsibilities, legislative duties or duty of care
- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to assess the quality of our services and how well our school is doing
- Statistical forecasting and planning
- to comply with the law regarding data sharing
- to comply with our Safeguarding procedures
- for the protection of vital interests
- for the provision of health and wellbeing
- for the performance of a contract

The categories of personal information that we collect, hold and share include:

- Personal information (such as name, unique pupil number and address)
- Characteristics (such as religion, ethnicity, language, nationality, country of birth and free school meal eligibility)
- Family and contact details
- Attendance information (such as sessions attended, number of absences and absence reasons) and exclusions
- Assessment information
- Modes of travel
- Relevant medical, special educational needs and behavioural information

The UK General Data Protection Regulation allows us to collect and use pupil information with consent of the data subject, where we are complying with a legal requirement, where processing is necessary to protect the vital interests of a data subject or another person and where processing 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. When the personal information is Special Category Information we may rely on processing being in the substantial public interest in addition to consent of the data subject and the vital interests of the data subject or another.

Our requirement for this data and our legal basis for processing this data includes the Education Act 1996, 2002 and 2011, The Childrens Act 1989 and 2004, Education and Skills Act 2008, Schools Standards and Framework Act 1998 and the Equalities Act 2010.

Collecting personal information

Whilst the majority of personal information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the UK General Data Protection Regulation, we will inform you whether you are required to provide certain personal information to us or if you have a choice in this. Where we are using your personal information only on the basis of your permission you may ask us to stop processing this personal information at any time.

Storing personal data

We hold pupil data in accordance with our retention schedule ([link](#)).

Who do we share pupil information with?

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- School health

Why we share pupil information

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

Data collection requirements:

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>.

The National Pupil Database (NPD)

The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

We are required by law, to provide information about our pupils to the DfE as part of statutory data collections such as the school census and early years' census. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013.

To find out more about the pupil information we share with the department, for the purpose of data collections, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

The department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment

of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided pupil information, (and for which project), please visit the following website: <https://www.gov.uk/government/publications/national-pupil-database-requests-received>

To contact DfE: <https://www.gov.uk/contact-dfe>

Requesting access to your personal data

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact Miss V Ryan, Data Protection Officer.

You also have the right, subject to some limitations 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 the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at

<https://ico.org.uk/concerns/>

Contact:

If you would like to discuss anything in this privacy notice, please contact:

- Miss V Ryan, Data Protection Officer on 01252 542511 / 01252 548123 or by e-mail, v.ryan@st-patricks.hants.sch.uk / v.ryan@st-bernadettes.hants.sch.uk