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

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 2026
Next Review Due:	March 2027
Cycle:	Annual
Ratified by Full Governing Body on:	
Signed:	
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.

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 Federation. This information is gathered in order to enable the provision of education and other associated functions. In addition, the Federation may be required by law to collect, use and share certain information.

The schools are the Data Controllers of the personal data that they collect and receive for these purposes.

The Federation has a Data Protection Officer, who may be contacted through the school office.

The Federation issues 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.

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.

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 complied with at all times:

1. **Lawfulness, fairness and transparency.** Personal data shall be processed lawfully, fairly and in a transparent manner. In order for personal data to be processed lawfully, it must be processed on the basis of one of the legal grounds set out in the UK GDPR. These include (amongst other relevant conditions) where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority exercised by the Federation.
Where the special categories of personal data are processed, this shall include (amongst other relevant conditions) where processing is necessary for reasons of substantial public interest.
When processing personal data and special category data in the course of school business, the Federation will ensure that these requirements are met where relevant.

2. **Purpose limitation.** 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). The Federation will only process personal data for specific purposes and will notify those purposes to the data subject when it first collects the personal data or as soon as possible thereafter.

3. **Data minimisation**. Personal data shall be adequate, relevant and limited to what is necessary to the purposes for which they are processed and not excessive. Personal data which is not necessary for the purpose for which it is obtained will not be collected.

4. **Accuracy.** Personal data shall be accurate and where necessary, kept up to date; Personal data should be reviewed and updated as necessary and should not be retained unless it is reasonable to assume that it is accurate. Individuals should notify the school of any changes in circumstances to enable records to be updated accordingly. The Federation will be responsible for ensuring that updating of records takes place where appropriate.

5. **Storage limitation.** 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. The Federation will not keep personal data for longer than is necessary for the purpose or purposes for which they were collected and will take reasonable steps to destroy or erase from its systems all data which is no longer required.

6. **Integrity and confidentiality**. Personal data shall be processed in a manner that ensures appropriate security of the personal data and which includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Duties
Personal data shall not be transferred to a country or territory outside the UK and the European Union (EU)/European Economic Area (EEA), 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 the Federation 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 the Federation plans to transfer personal data outside the UK and the EU/EEA the Federation 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 Federation 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 the Federation decide to use an individual's personal data for a different reason to that for which it was originally collected the Federation 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 UK and the EU/EEA without the appropriate safeguards.
- Ensure that all staff and governors are aware of and understand these policies and procedures.

Retention and Disposal of Personal Data

The Federation will dispose of personal data in a way which protects the rights and privacy of data subjects (e.g. shredding, disposal as confidential waste, secure electronic deletion) as appropriate.

The Federation maintains a Retention Schedule that is specific and relevant to the specific types of information retained. The schedule outlines the appropriate periods for retention in each case.

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. The policy review will be undertaken by the Data Protection Officer, Head teacher, or nominated representative.

Contacts
If you have any enquires in relation to this policy, please contact Miss V Ryan via the school office, who will also act as the contact point for any queries.

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	The information making up 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.	

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 Prayer and Liturgy ➢ 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 @ .1p per sheet (black & white)	Actual cost
	Photocopying/printing @ 5p per sheet (colour)	Actual cost
	Postage	Actual cost of Royal Mail standard 2nd class
Statutory Fee		In accordance with the relevant legislation.

* the actual cost incurred by the public authority.

PRIVACY NOTICE FOR SCHOOL PUPILS AND PARENTS

Privacy Notice (How we use personal information)

St Bernadette's / St Patrick's Catholic Primary School is the Data Controller for the use of personal data in this privacy notice.

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 keep children safe (food allergies or emergency contact details)
- 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
- to meet the statutory duties placed upon us by the Department for Education (DFE) data collections

Department for Education (DfE)
We are required to share information about our pupils with the Department for Education (DfE) either directly or via our local authority for the purpose of those data collections.

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

- Personal identifiers and contact details (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, absence reasons and any previous schools attend)
- Assessment and attainment (such as phonics results, post 16 courses enrolled for and any relevant results)
- special educational needs (including the needs and ranking)
- medical and administration (such as doctors information, child health, dental health, allergies, medication and dietary requirements)
- behavioural information (such as exclusions and any relevant alternative provision put in place)
- Safeguarding information (such as court orders and professional involvement)
- Modes of travel

Legal Basis for Processing

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing pupil information are:

- 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 data consists of special category data 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.

When we process personal information for the purposes of complying with a legal requirement the relevant legislation includes the Education Act 1996, 2002 and 2011, The Children's Act 1989 and 2004, Education and Skills Act 2008, Schools Standards and Framework Act 1998 and the Equalities Act 2010.

We also share pupils' data with the Department for Education (DfE) on a statutory basis either directly or via our local authority. 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) or the Department for Education (DfE) under regulation 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

Collecting personal information
We collect pupil information via forms completed by parents,, Common Transfer File (CTF), images and data collected by the school, or secure file transfer from previous school.

Pupil data is essential for the schools' operational use. 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 data protection legislation, we will inform you at the point of collection, whether you are required to provide certain personal information to us or if you have a choice in this.

Storing personal data
We hold pupil data securely for the set amount of time shown in our data retention schedule which is available on request from the school office.

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 School Health team
- the Department for Education (DfE)
- the Diocese of Portsmouth

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.

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 pupils' personal data with certain third parties, including:

- schools
- local authorities
- researchers
- organisations connected with promoting the education or wellbeing of children in England
- other government departments and agencies
- organisations fighting or identifying crime

For more information about the Department's NPD data sharing process, please visit: https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

Organisations fighting or identifying crime may use their legal powers to contact DfE to request access to individual level information relevant to detecting that crime. Whilst numbers fluctuate slightly over time, DfE typically supplies data on around 600 pupils per year to the Home Office and roughly 1 per year to the Police.

For information about which organisations the Department has provided pupil information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the Police please visit the following website: https://www.gov.uk/government/publications/dfe-external-data-shares

Requesting access to your personal data

Under the General Data Protection Regulation, 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 [schools to include contact details of their 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
- a right to seek redress, either through the ICO or through the courts

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 via the school office.

Sharing by the Department for Education (DfE)

DfE will only share pupils' personal data where it is lawful, secure and ethical to do so. Where these conditions are met, the law allows the Department for Education (DfE) to share pupils' personal data with certain third parties, including:

- schools and local authorities
- researchers
- organisations connected with promoting the education or wellbeing of children in England
- other government departments and agencies
- organisations fighting or identifying crime

For more information about the Department for Education's (DfE) NPD data sharing process, please visit: https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

Organisations fighting or identifying crime may use their legal powers to contact the Department for Education (DfE) to request access to individual level information relevant to detecting that crime.

For information about which organisations the Department for Education (DfE) has provided pupil information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and the Police please visit the following website:
https://www.gov.uk/government/publications/dfe-external-data-shares

How to find out what personal information the Department for Education (DfE) holds about you

Under the terms of the UK GDPR, you are entitled to ask the Department for Education (DfE):

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department for Education (DfE), you should make a 'subject access request'. Further information on how to do this can be found within the Department for Education's (DfE) personal information charter that is published at the address below:

https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter; or

https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights

To contact the Department for Education (DfE): https://www.gov.uk/contact-dfe