



# Privacy Notice

## Parents/ Carers and Pupils

**Responsible for policy:**  
**Chair of Directors**

**CC2: Strategy, People and Organisational Development**



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## Definitions

In this **Student and Pupil Friendly Privacy Notice**, unless the context otherwise requires, the following expressions shall have the following meanings:

- i **'The Romero Catholic Academy'** means the Company named at the beginning of this **Parents and Pupils Privacy Notice** and includes all sites upon which the Company is undertaking, from time to time, being carried out. The Romero Catholic Academy includes; **Corpus Christi, Good Shepherd, Sacred Heart, Blue Sky, SS Peter and Paul, St Gregory, St John Fisher, St Patrick, Cardinal Wiseman, Shared Services Team.**
- ii **'Romero Catholic Academy'** means the Company responsible for the management of the Academy and, for all purposes, means the employer of staff at the Company.
- iii **'Board'** means the board of Directors of the Romero Catholic Academy.
- iv **'Chair'** means the Chair of the Board or the Chair of the Local Governing Body of the Academy appointed from time to time, as appropriate.
- v **'Governance Professional'** means the Governance Professional to the Board or the Governance Professional to the Local Governing Body of the Academy appointed from time to time, as appropriate.
- vi **'Chief Executive Officer or CEO'** means the person responsible for performance of all Academies and Staff within the Multi Academy Company and is accountable to the Board of Directors.
- vii **'Diocesan Schools Commission'** means the education service provided by the diocese, which may also be known, or referred to, as the Birmingham Diocesan Education Service.
- viii **'Local Governing Body'** means the Governing Body of the School.
- ix **'Governing Body Representatives'** means the governors appointed and elected to the Local Governing Body of the School, from time to time.
- x **'Principal'** means the substantive Principal, who is the person with overall responsibility for the day to day management of the school.
- xi **'School'** means the school or college within The Romero Catholic Academy and includes all sites upon which the school undertaking is, from time to time, being carried out.
- xii **'Shared Services Team'** means the staff who work in the central team across the Company (e.g. HR/ Finance)
- xiii **'Vice-Chair'** means the Vice-Chair of the Governing Body elected from time to time.
- xiv **'School DPO'** means the Data Protection Officer responsible for all schools within The Romero Catholic Academy (Warwickshire Legal Services)

## 1. Introduction

The Romero Catholic Academy is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

The schools that we look after are: -

- Cardinal Wiseman Catholic Secondary School
- Corpus Christi Catholic Primary School
- Good Shepherd Catholic Primary School
- Sacred Heart Catholic Primary School
- SS Peter and Paul's Catholic Primary School
- St Gregory's Catholic Primary School
- St John Fisher Catholic Primary School
- St Patrick's Catholic Primary School

The Romero Catholic Academy is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: ZA137894.

You can contact the Academy Trust as the Data Controller in writing at:

Helen Quinn DPO

The Romero Catholic Academy

C/O Cardinal Wiseman Catholic School

Potters Green Road

Coventry

CV2 2AJ

or [admin@romeromac.com](mailto:admin@romeromac.com)

## 2. What is a Privacy Notice

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our pupils and parents.

## 3. What is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information relates to personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

#### 4. What personal information do we process about pupils and parents/ carers

The pupil and parent information that we collect, hold and share includes:

- Personal information including a pupil's name, date of birth, unique pupil number, home address
  - Attendance information such as sessions attended, number of absences and absence reasons.
  - Educational information including records of work, assessment results, relevant medical information, details of pupils' special educational needs, exclusions/behavioural information, post-16 learning information.
  - Contact information for parents, carers and other relatives, including telephone numbers, home addresses and e-mail addresses.
  - Information about a child's home life, where required as part of necessary safeguarding and welfare processes.
  - Details of any support received, including care packages, plans, and support providers.
- 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

#### 5. Who looks after your information?

We use pupil data:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- To protect pupil welfare
- to assess the quality of our services
- to comply with the law regarding data sharing
- to safeguard pupils
- to share medical information with health professionals
- Administer admissions waiting lists
- Carry out research

#### 6. Use of yours or your child's personal data for marketing purposes

Where you have given us consent to do so, we may send you or 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 contacting us (see 'Contact us' below).

#### 7. 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.

## 8. Collecting pupil information

Whilst the majority of pupil 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 pupil information to us or if you have a choice in this.

Most of the data we collect in relation to parents and pupils will come direct from the parent or pupil. However, we may also hold data relating to you and/or your child that has come from:

- Local authorities
- Government departments or agencies
- Police force, courts, tribunals
- External support services

## 9. What are the legal reasons for us to process your personal information?

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. The lawful reasons we have for processing personal information are as follows:

### 1) To comply with the law

We collect and use general purpose pupil information in order to meet certain legal requirements and legal obligations placed upon the Academy Trust by law. We therefore are required to process personal information for such purposes even if you have not consented to us doing so.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

If you would like a copy of or further information regarding the statutory authorities that underpin our legal obligations, you should contact the Romero Catholic Academy in writing.

### 2) To protect someone's vital interests

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

### 3) With the consent of the individual to whom that information 'belongs'

Whilst much of the personal information processed is in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

### 4) To perform a public task

It is a day-to-day function of the Academy Trust to ensure that children receive the education and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that pupils are properly educated and supported

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

### 5) We have a legitimate interest

Occasionally we have reasons to process information which fall outside of our usual day-to-day school functions. Details of the type of processing that we may undertake on this basis are set out in Table 5.

## 10. Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

1. Explicit consent of the data subject
2. Processing relates to personal data which is manifestly made public by the data subject
3. Necessary for establishing, exercising or defending legal claims
4. Necessary for reasons of substantial public interest
5. Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
6. Necessary for archiving, historical research or statistical purposes 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 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

## 11. Who might we share your 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 nurse
- NHS
- Public Health and other public health agencies
- Information Management software: SIMS/Arbor, Synergy, Wonde
- Education/classroom apps: Times Tables Rockstars, Studybugs, Mathletics,
- Conferencing software for homework and home learning: [insert the relevant platforms e.g., Google Classroom, Microsoft Teams, Zoom, Loom]
- HR and Payroll
- Compass+ (The Careers and Enterprise Company)

We do not share information about our pupils or parents unless the law and our policies allow us to do so.

Please refer to the tables for information about what personal information is shared with which specific third parties.

## 12. 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>.

## 13. What do we do with your information?

All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected. The Romero Catholic Academy monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

We have security measures in place to prevent yours and your child's information from being accidentally lost, used, or accessed in an authorised way, altered, or disclosed.

## 14. How long do we keep your information for?

In retaining personal information, the Romero Catholic Academy complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the school/Academy Trust are required to retain the information.

A copy of those schedules can be located using the following link:

<http://irms.org.uk/page/SchoolsToolkit>

## 15. Transferring data internationally

Where we transfer personal data to a country outside of the UK, we will do so with the appropriate safeguards in place in accordance with data protection law.

## 16. What are your rights with respect of your personal information?

Under data protection law, 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 to have access to your child's educational record, contact the school data protection contact or the School Data Protection Officer at Warwickshire Legal Services via email at [schooldpo@warwickshire.gov.uk](mailto:schooldpo@warwickshire.gov.uk) or alternatively;

School Data Protection Officer  
Warwickshire Legal Services  
Warwickshire County Council  
Shire Hall  
Market Square  
Warwick  
CV34 4RL

**\*\*Please ensure you specify which school your request relates to.**

**In certain circumstances** where the Romero Catholic Academy processes data for the purposes of legitimate interests or to fulfil their public task, individuals have a right to object to the processing where it is likely to cause, or is causing, harm or distress. When exercising this right, individuals should contact the school/academy trust to inform them of their reasons for their objection. The school/academy trust will consider the reasons for any objection and assess the risk to the individual against the purposes for the processing. In the event the school/academy trust is unable to comply



with an objection, we will ensure we can demonstrate compelling legitimate grounds to continue with the processing.

Where the Romero Catholic Academy processes your information with your consent, you have the right to withdraw your consent at any time. To exercise this right, please contact the Romero Catholic Academy at [admin@romeromac.com](mailto:admin@romeromac.com)

You also have the right to:

- 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/>

### **17. Monitoring and Review**

The Board of Directors delegate the implementation of this privacy notice to the Local Governing Body. This policy will be reviewed by CC2 Strategy, People and Organisational Development.

### Third Party List we routinely share staff information with:

- Adobe
- Advent Communications Public Relations
- Amazon UK Services Ltd
- Apple Inc
- Arbor
- Aspire People Ltd
- Aspire Teachers
- Billingtons Safety Services
- Brightminds Recruitment
- CAPITA
- Companies House
- Coventry City Council
- Coventry & Warwickshire Partnership Trust
- Create Onsite Limited
- Dains LLP
- Dataplan Payroll Ltd
- Department for Education
- Disclosure and Barring Service
- Doodle
- Dyslexia Coventry
- Emergency Services
- Eventbrite Inc
- Every
- Everwell Occupational Health
- Facebook Inc
- For Schools Education
- GDPRis
- Google
- Governor Hub
- HMRC
- Hays Recruitment
- Image Plus
- IMP Software Ltd
- Inventory Solutions Ltd
- IRIS Connect Ltd
- Just Teachers
- Kenelm Youth Trust Ltd
- Kiddivouchers
- Lightspeed Systems Inc
- Lloyds Bank PLC
- Lime Recruitment
- Matthew Stokes
- Microsoft
- Midlands Training Centre
- Monarch Education
- National College of Teaching and Leadership
- NS Optimum Ltd
- NSPCC
- NCFE
- Pepper Therapy Ltd
- Primary Goal Ltd
- Public Health England
- Relate Coventry & Warwickshire
- Sandgate Systems Ltd
- School Business Services Ltd
- Skill Base Training Ltd t/a Skill Base First Aid
- Solihull Metropolitan Borough Council
- Stone King LLP
- Survey Monkey
- Teach First
- Teachers' Pension Service
- Teaching with heart
- TES Global Ltd
- The Archdiocese of Birmingham – Diocesan Education Service
- The Key Support Services Limited
- TopMark Claims Management Ltd
- Twitter Inc
- University of Warwick
- Virtue Technologies Ltd
- Warwickshire County Council
- Westfield health
- West Midlands Pension Scheme
- West Midlands Police
- WhatsApp
- Xero (UK) Ltd
- You Tube LLC

***We do not share information about our staff unless the law and our policies allow us to do so.***

**Table 1** – Personal information we are required to process to comply with the law:

Information Type	Relevant legislation	Special Category–additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Special Education Needs Report	Children’s and Families Act 2014, section 69		Local Authority	Legal Obligation
Attendance register	Education (Pupil Registration)(England) Regulations 2006, Regulation 4, 10, 11 and 12		OFSTED, Local Authority	Legal Obligation
Common Transfer file	Education (Pupil Registration)(England) Regulations 2005, Regulation 6		School pupil transfers to	Legal Obligation
Safeguarding information	Education Act 2002, section 175  Children’s Act 1989, Section 17, 47, 83.  Children’s Act 2004, Section 11		Local Authority	Legal Obligation
Admissions Register	Education (Pupil Registration)(England) Regulations 2006, Regulation 4, 10, 11, 14 and 15		OFSTED, Local Authority	Legal Obligation
Curricular Record including Assessment and achievement data	Education (Pupil Information) (England) Regulations 2005, Regulation 4		OFSTED, Local School. Local Authority	Legal Obligation
Educational Record	Education (Pupil Information) (England) Regulations 2005,		Parents, Local school	Legal Obligation

	Regulation 5 and 6			
Pupil Information i.e name, age address, Emergency contact details	Education (Information About Individual Pupils) (England) Regulations 2013, Regulation 3 and 5		Department of Education – school census. Other schools – when pupils transfers	Legal Obligation
Medical / Dietary / allergies		Necessary for preventative or occupational medicine	Department of Education – school census. Other schools – when pupils transfers	Legal Obligation
School Census	Education Act 1996, Sections 537 & 537A, and accompanying regulations		Department of Education	Legal Obligation
Staff information, including personal details, DBS check, qualifications	Education Act 2005, section 114		Secretary of State, Warwickshire County Council, Disclosure and Barring Service	Legal Obligation

**Table 2** – Personal information we are required to process as it is necessary to protect someone's vital interests

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Medical Information	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent'	Medical staff i.e. paramedics/ambulance	Vital Interest
Religious belief	Necessary to protect vital interests of the data subject or another person where the data	Medical staff i.e. paramedics/ambulance	Vital Interest

	subject is physically or legally incapable of giving consent'		
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**Table 3** - Personal information we are required to process with the consent of the individual to whom that information 'belongs' - please note that you have the right to withdraw your consent for us to process this information at any time.

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Photographs		Government agencies, eg Department for Education,	Consent
Email address		Not shared	

**Table 4** - Personal information we are required to process because it is necessary to do so in order to perform a public task – please note that the right to object will apply to **some** of this processing, please see the section above that refers to 'What are your rights with respect of your personal information?'

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Pupil Information i.e name, age address, Parent detail, Emergency contact details		Department of Education – school census. Other schools – when pupils transfers	Legal Obligation
Academic Progress data including Leuven data, wellcom data, Learning journals, staff observations		OFSTED, Parents, Health such as Speech and Language	Public Task & Legal Obligation
Safeguarding information, Medical, Special Education Needs		Local Authority, Health, Parents	Legal Obligation
Educational and Safeguarding Information used internally for the purpose of educating and protecting the welfare of children.			

**Table 5 - Personal information we process because we have a legitimate interest.** please note that the right to object will apply to **some** of this processing, please see the section above that refers to 'What are your rights with respect of your personal information?'

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Images captured on our CCTV system	n/a	This is not shared routinely	n/a