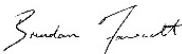




Privacy Notice

Parents/ Carers and Pupils

Responsible for policy:	CC2 Strategy, People and Organisational Development
Policy status:	Compliance
Policy review:	Annually
Chair of Directors:	

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Definitions

In this **Parent /Carers and Pupil 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, 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** for the purposes of UK data protection law. This means we are responsible for how your personal information and your child's personal information is collected, used and stored.

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

2. What is a Privacy Notice

A Privacy Notice explains how we collect, use, store and share personal information, and outlines your rights under UK data protection law.

3. What is Personal Information?

Personal information is any data that identifies an individual, directly or indirectly.

Special category data includes more sensitive information such as:

- health and medical information
- ethnicity
- religious beliefs
- special educational needs

We may also process **criminal offence data** where required for safeguarding purposes.

4. What personal information do we process

We collect and process information about pupils and their parents/carers.

Pupil data

- Name, date of birth, unique pupil number
- Home address and contact details
- Attendance records
- Assessment and attainment data
- Behaviour and safeguarding records
- Special educational needs and support plans
- Medical and health information

Parent/carer data

- Names and contact details
- Relationship to the child

- Communication preferences

Additional information

- Photographs and video recordings (where appropriate)
- CCTV images captured on school premises
- Information about a pupil's home circumstances (for safeguarding purposes)

5. Why do we use personal information?

We use pupil and parent/carers data to:

- Support teaching and learning
- Monitor and report on pupil progress
- Provide pastoral care and safeguarding
- Meet legal and statutory requirements
- Communicate with parents and carers
- Maintain school records
- Ensure the safety of pupils, staff and visitors
- Provide appropriate support, including for special educational needs

6. What are our legal bases for processing your data?

We only process personal data where the law allows us to.

Lawful bases under UK GDPR (Article 6)

We rely on:

- **Legal obligation** – to comply with education, safeguarding and child protection laws
- **Public task** – to provide education and support to pupils
- **Vital interests** – to protect life or safety in emergencies
- **Consent** – for specific activities such as photographs or marketing communications

Special category data (Article 9 + DPA 2018 Schedule 1)

We process sensitive data under the following conditions:

- Safeguarding of children and vulnerable individuals
- Substantial public interest (education and equality monitoring)
- Preventive or occupational health
- Legal claims

Purpose	Data	Lawful basis	Special category condition
Education delivery	Pupil records	Public task	Substantial public interest
Safeguarding	Behaviour, welfare data	Legal obligation	Safeguarding
School census	Personal data	Legal obligation	Substantial public interest
Medical support	Health data	Vital interests / Legal obligation	Health / safeguarding

7. Who do we share your information with?

We only share personal data where necessary and lawful.

This may include:

- Department for Education (DfE)
- Local authority
- Ofsted

- NHS and school nursing services
- Safeguarding partners and social services
- Other schools (when pupils transfer)
- Approved IT and education service providers (e.g. school systems and learning platforms)

Important information:

- Some organisations act as **data processors** on our behalf
- Others are **independent data controllers**

8. CCTV

CCTV is used across our sites for:

- safeguarding
- safety and security
- crime prevention

CCTV footage is stored securely and only accessed where necessary and lawful.

9. International data transfers

Some of our systems may store data outside the UK.

Where this occurs, we ensure appropriate safeguards such as:

- UK adequacy regulations
- International Data Transfer Agreement (IDTA)
- Standard contractual clauses

Further information is available from the Data Protection Officer.

10. How long do we keep your information?

We only keep personal data for as long as necessary.

We follow the **Information and Records Management Society (IRMS) Schools Toolkit**, including:

- Pupil records: retained in line with statutory requirements
- Safeguarding records: retained in accordance with safeguarding guidance
- CCTV footage: typically up to **30 days**

Further details are available in our Records Management Policy.

11. Your rights

Under UK data protection law, you and (in appropriate circumstances) your child have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request erasure (in certain circumstances)
- Restrict processing

- Object to processing
- Data portability (where applicable)
- Withdraw consent at any time (where relied upon)

Children's rights

As children mature, they may be able to exercise their own data rights. This depends on their age and understanding.

12. Complaints

If you have concerns about how we handle your data, please contact us in the first instance.

You also have the right to complain to the Information Commissioner's Office:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Helpline: 0303 123 1113
Website: <https://ico.org.uk>

13. Data security

We take appropriate steps to protect your data, including:

- secure IT systems
- staff training
- controlled access to information
- data protection policies and procedures

14. Links with other policies

This notice should be read alongside:

- Data Protection Policy
- Information Security Policy
- Safeguarding Policy
- CCTV Policy
- Records Management Policy

15. Monitoring and Review

The Board of Directors delegate the implementation of this privacy notice to the Local Governing Body. This Privacy Notice is reviewed annually by CC2 Strategy, People and Organisational Development.

Third Party List we routinely share 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
- Invenry 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