



CARDINAL  
NEWMAN  
CATHOLIC SCHOOL

# Student Privacy Notice

Dated: September 2022

**Document Control:**

**A) Version History**

Version	Status	Date	Summary of Changes
1.0	Approved	11/01/2018	
1.1	Approved	15/01/2018	
1.2	Approved	17/01/2018	Passed to GDPR workgroup
1.3	Approved	30/01/2018	Approved by GDPR workgroup. Passed to Governing Body for approval.
2.0	Approved	20/05/2019	Rewrite of policy
2.4	Updated	14/04/2020	Update of Policy to include MAC's Data Protection Policy
2.5	Updated	09/06/2021	Update of Policy to include The PiXL Club
2.6	Updated	11/06/2021	Update to section 5 by WPDO
3.0	Updated	27/07/202	Change of MIS from SIMS to Arbor Updated catering – Taylor Shaws to Academy Catering

**B) Approval Control:**

**Approved by:** [Name]

**Date:** [Date]

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During an individual's time with Holy Cross Multi-Academy Company we will use information that we gather in relation to them for various purposes. Information that we hold in relation to individuals is known as their "personal data". This will include data that we obtain from the individual directly and data about the individual that we obtain from other people and organisations. We might also need to continue to hold an individual's personal data for a period of time after they have left the school. Anything that we do with an individual's personal data is known as "processing". This document sets out what personal data we will hold about our workforce, why we process that data, who we share this information with, and the rights of individuals in relation to their personal data processed by us.

Holy Cross Catholic Multi Academy Company is the 'data controller'. This means they are responsible for how your personal information is processed and for what purposes. Cardinal Newman Catholic School, Coventry is responsible for assisting the Academy Company with processing your personal information.

Holy Cross Catholic Multi Academy Company is registered as the Data Controller with the Information Commissioner's Office (IC); Registration Number: ZA553195.

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

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

Or by emailing: [schooldpo@warwickshire.gov.uk](mailto:schooldpo@warwickshire.gov.uk)

## **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.

## **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.

## **What personal information do we process about pupils and parents?**

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

- Personal information including a pupil's name, date of birth, gender, unique pupil number and home address
- Characteristics such as ethnicity, religion, language, nationality, country of birth and free school meal eligibility
- 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.
- Health, information about dietary requirements, allergies, medication, any medical interventions required
- Information about a child's home life, where required as part of necessary safeguarding and welfare processes.
- Information about child's medical history, reports from external medical professionals,
- Pupil photographs

## **Why do we use personal information?**

We use pupil data:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing
- to safeguard pupils
- to provide statistical data for the Department of Education

### **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 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.

## **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 school 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 school 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 school 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.

#### 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

The lawful reasons for each type of special category personal information data that we process is set out in the tables attached.

## **5) Who might we share your information with?**

We routinely share pupil information with:

- Local Authority
- NHS Trust
- Health authorities
- Department for Education
- Classroom applications
- Education programmes and software
- Software providers – e.g., management information systems
- School nurse
- Education and health professionals – e.g., therapists, counsellors, psychologists.
- Catering services
- Online learning platforms

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.

### **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>.

### **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 school 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).

### **How long do we keep your information for?**

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

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

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

### **Transferring data internationally**

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

### **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 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

You also have the right 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/>

**Review**

The content of this Privacy Notice will be reviewed on August 2021

**NHS Track and Trace (Covid-19 Response)**

To assist with the school's engagement of the Test and Trace Scheme, we are requesting contact details from individuals in addition to the usual information required from our visitors. Should it become apparent that you may have come into contact with a person who has tested positive for COVID19, we may be requested to share your name and contact details with the NHS Test and Trace Scheme.

We will only keep your telephone number/contact details for 21 days, at which point it will be deleted/securely disposed. For further details on how we process your information, please refer to our privacy notice on the school's website. Further information on the Test and Trace Scheme can be found by visiting;

<https://www.gov.uk/guidance/nhs-test-and-trace-how-it-works>



**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
Pupil Name	Education Regulations 2006	N/A	Arbor (school information management system)  CPOMS SYSTEMS LIMITED  The PiXL Club  New Schools  Academy Catering  Coventry City Council  NHS England  EduFOCUS Ltd (Evolve)	Education Regulations Education Act 2002, 1996 Children’s Act 1989 and 2004 Education Regulations Health and Safety at Work Act  Vital interest of the school pupil
Pupil’s Date of Birth	Education Regulations 2006	N/A	Arbor (school information management system)  CPOMS SYSTEMS LIMITED  The PiXL Club  New Schools  Academy Catering  Coventry City Council  NHS England  EduFOCUS Ltd (Evolve)	Education Regulations Education Act 2002, 1996 Children’s Act 1989 and 2004 Education Regulations Health and Safety at Work Act  Vital interest of the school pupil
Pupils’ Gender	Education Regulations 2006	N/A	Arbor (school information management system)  CPOMS SYSTEMS	Education Regulations Education Act 2002, 1996 Children’s Act 1989 and 2004 Education Regulations Health and Safety at Work

			LIMITED The PiXL Club New Schools Academy Catering Coventry City Council NHS England EduFOCUS Ltd (Evolve)	Act  Vital interest of the school pupil
Pupil's Home Address	Education Regulations 2006	N/A	Arbor (school information management system) CPOMS SYSTEMS LIMITED New Schools Academy Catering Coventry City Council NHS England EduFOCUS Ltd (Evolve)	Education Regulations Education Act 2002, 1996 Children's Act 1989 and 2004 Education Regulations Health and Safety at Work Act  Vital interest of the school pupil
Pupils Emergency Contact Details	Education Regulations 2006	N/A	Arbor (school information management system) CPOMS SYSTEMS LIMITED New Schools Academy Catering Coventry City Council NHS England EduFOCUS Ltd (Evolve)	Education Regulations Education Act 2002, 1996 Children's Act 1989 and 2004 Education Regulations Health and Safety at Work Act  Vital interest of the school pupil
Pupils Dietary Information	Education Act 2002	N/A	Arbor (school information	Education Regulations Education Act 2002, 1996

including allergies	section 175 - safeguarding and welfare of pupils		management system) CPOMS SYSTEMS LIMITED Academy Catering	Children's Act 1989 and 2004 Children's Act 2004  Vital interest of the school pupil
Pupils eligibility for FSM	Education Act 1996, section 507B and A	N/A	Arbor (school information management system)	Education Regulations  Vital interest of the school pupil
Pupil's Registered GP	Education Act 1996, section 507B and A	N/A	Arbor (school information management system)	Education Regulations  Vital interest of the school pupil
Pupil Ethnicity	Education Act 1996, section 507B and A	Statistical purposes	Arbor (school information management system)  Department of Education	Education Regulations  Vital interest of the school pupil
Pupil Language	Education Act 1996, section 507B and A	Statistical purposes	Arbor (school information management system)  Department of Education	Education Regulations  Vital interest of the school pupil
Pupil Religion	Education Act 1996, section 507B and A	Statistical purposes	Arbor (school information management system)  Department of	Education Regulations  Vital interest of the school pupil

			Education	
Pupil Traveller Status	Education Act 1996, section 507B and A	Statistical purposes	Arbor (school information management system)  Department of Education	Education Regulations  Vital interest of the school pupil
Pupil Attendance History	Education Regulations 2006 regulation 4, 10, 11, 12.	N/A	Arbor (school information management system)  Coventry City Council  CPOMS SYSTEMS LIMITED  (online safeguarding system)  New Schools	Education Regulations Education Act 2002, 1996 Children's Act 1989 and 2004 Education Regulations  Vital interest of the school pupil
Special Education Needs Information  (SEND or SENDCo)	Education Act 1996, section 317.  Children and Families Act 2014, section 69, 29.  Children's Act 1989 section 36,  Education Act 2002, section 175,	N/A	Data is shared with internal agencies within Coventry City Council:  - School Nurse,  - Special Educational Mental Health and Learning (SEMHL)  - Education Psychologist  - Coventry City Council Complex Communication Team  - Occupational Therapist  - Physiotherapist  - Speech and Language	Education Act 1996, section 317.  Children and Families Act 2014, section 69, 29.  Children's Act 1989 section 36, Education Act 2002, section 175,  Children's Act 1989 section 17, 47.  Children's Act 2004 section 11

	<p>Children's Act 1989 section 17, 47.</p> <p>Children's Act 2004 section 11</p>		<p>- Looked after children team.</p> <p>Information is also shared between schools if a child moves from one school to another. Or if we access assistance/support from another school</p> <p>External sharing:</p> <ul style="list-style-type: none"> <li>- NHS England</li> <li>- CPOMS SYSTEMS LIMITED SYSTEMS LIMITED</li> </ul>	Vital interest of the school pupil
Safeguarding Pastoral/ Home Life Information	<p>Safeguarding - Education Act 2002, 1996</p> <p>Children's Act 1989 and 2004</p>	N/A	<p>The school shared data with internal Coventry City Council Departments:</p> <ul style="list-style-type: none"> <li>- Social care</li> <li>- Attendance and inclusion officer</li> <li>- New schools</li> </ul> <p>External Department sharing:</p> <ul style="list-style-type: none"> <li>- Various charities that children get may referred to for counselling.</li> <li>- Police and emergency services</li> <li>-CPOMS SYSTEMS LIMITED</li> </ul>	<p>Safeguarding - Education Act 2002, 1996</p> <p>Children's Act 1989 and 2004</p> <p>Charity referrals with parent consent</p> <p>Vital interest of the school pupil</p>

**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
Child’s Name	N/A	West Midlands Police West Midlands Fire Service West Midlands Ambulance service	Vital interest of the school pupil
Parents/Carers Contact Details	N/A	West Midlands Police West Midlands Fire Service West Midlands Ambulance service	Vital interest of the school pupil
Gender	N/A	West Midlands Police West Midlands Fire Service West Midlands Ambulance service	Vital interest of the school pupil
Age	N/A	West Midlands Police West Midlands Fire Service West Midlands Ambulance service	Vital interest of the school pupil
Relevant Medical Information	Vital Interest	West Midlands Police West Midlands Fire Service West Midlands Ambulance service	Vital interest of the school pupil
Disability Status	Vital Interest	West Midlands Police West Midlands Fire Service	Vital interest of the school pupil

		West Midlands Ambulance service	
Safeguarding Information as necessary	N/A	West Midlands Police West Midlands Fire Service West Midlands Ambulance service	Vital interest of the school pupil

**Table 3** - Personal information we are required to process with the consent of the individual to whom that information ‘belongs’

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Pupil Name	N/A	Group Call Ltd ISUZ Ltd Edukey Ltd Bedrock Learning Ltd Teacher Centric Ltd School Cloud Systems Ltd Photography Company Dol-y-Moch (residential location only shared if attending) Micro Librarian (book lending system) The PiXL Club	Public Task
Pupil’s Date of Birth	N/A	Group Call Ltd ISUZ Ltd Edukey Ltd Bedrock Learning Ltd Teacher Centric Ltd School Cloud Systems Ltd Photography Company Dol-y-Moch (residential location only shared if attending) Micro Librarian (book lending system) The PiXL Club	Public Task
Pupils Gender	N/A	Group Call Ltd	Public Task



		<p>ISUZ Ltd</p> <p>Edukey Ltd</p> <p>Bedrock Learning Ltd</p> <p>Teacher Centric Ltd</p> <p>School Cloud Systems Ltd</p> <p>Photography Company</p> <p>Dol-y-Moch (residential location only shared if attending)</p> <p>Micro Librarian (book lending system)</p> <p>The PiXL Club</p>	
Pupils Home Address	N/A	<p>Group Call Ltd</p> <p>ISUZ Ltd</p> <p>Teacher Centric Ltd</p> <p>School Cloud Systems Ltd</p> <p>Dol-y-Moch (residential location only shared if attending)</p> <p>Micro Librarian (book lending system)</p>	Public Task
Pupils Emergency Contact Details	N/A	<p>Group Call Ltd</p> <p>ISUZ Ltd</p> <p>Teacher Centric Ltd</p> <p>School Cloud Systems Ltd</p> <p>Dol-y-Moch (residential location only shared if attending)</p> <p>Micro Librarian (book lending system)</p>	Public Task
Parents Email	N/A	Group Call Ltd	Public Task

Address		<p>ISUZ Ltd</p> <p>Teacher Centric Ltd</p> <p>School Cloud Systems Ltd</p> <p>Dol-y-Moch (residential location only shared if attending)</p> <p>Micro Librarian (book lending system)</p>	
Pupils Dietary Information including allergies	Vital Interest	<p>Group Call Ltd</p> <p>ISUZ Ltd</p> <p>Teacher Centric Ltd</p> <p>School Cloud Systems Ltd</p> <p>Dol-y-Moch (residential location only shared if attending)</p> <p>Micro Librarian (book lending system)</p>	Public Task
Pupils Registered GP	N/A	N/A	
Child's Photograph	N/A	<p>Group Call Ltd</p> <p>ISUZ Ltd</p> <p>Teacher Centric Ltd</p> <p>School Cloud Systems Ltd</p> <p>Dol-y-Moch (residential location only shared if attending)</p> <p>Micro Librarian (book lending system)</p>	Public Task

**Table 4** - Personal information we are required to process because it is necessary to do so in order to perform a public task

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Pupils Name	N/A	Department of Education  Volunteers/ Trainee Teachers  Coventry City Council  - Translation service  - Admissions dept	Legal Obligation
Pupils Date of Birth	N/A	Department of Education	Legal Obligation
Pupils Gender	N/A	Department of Education	Legal Obligation
Pupils Eligibility for FSM	N/A	Department of Education	Legal Obligation
Pupil Attendance History	N/A	Department of Education	Legal Obligation