



**Privacy Notice  
Parents and Pupils  
2019/2020**

## 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. We are the data controller for the following schools within our Multi Academy Company: -

- Cardinal Wiseman Catholic 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:

The Romero Catholic Academy C/O Cardinal Wiseman Catholic School, Potters Green Road, Coventry CV2 2AJ or [office@romeromac.com](mailto:office@romeromac.com)

## 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, unique pupil number and home address
- Characteristics such as ethnicity, 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.
- Information about a child's home life, where required as part of necessary safeguarding and welfare processes.

## 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

## 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 Academy Trust by law. We therefore are required to this 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 Academy Trust 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.

## 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.

## Who might we share your information with?

We routinely share pupil information with:

- Schools that the pupils attend after leaving us
- Our local authority – Coventry City Council
- The Department for Education (DfE)
- 123 Comms Ltd – ParentMail
- 3P Learning Ltd
- Adobe
- Advent Communications Public Relations
- Andy Blair Sports
- Animatron Inc
- Aperture Events Ltd – Aperture Photography
- Apple Inc
- Armonico Consort
- Association of Schools and College Leaders
- AT7
- Audacity
- Bebras
- Billingtons Safety Services
- Birmingham Diocesan Education Service
- Biostore Ltd
- Bonacia Ltd – Young Writers
- Bookpoint
- Bowland Charitable Trust
- Braiswick Photographic Co. Ltd
- CAPITA Education Software Services
- CASCAID Ltd – Kudos and Launchpad
- Caterlink
- CAHMS
- Childnet. International
- Cintra
- Class Twist Inc – Class Dojo
- C – learning Ltd
- Clicker 7
- Clubs Complete Limited
- Code.org
- CoolMilk at School Ltd
- Contact Group t/a Truancy Call
- CPOMS
- 4C Software
- Communicate to learn
- Computing at school
- Coventry City Council
- Coventry Rape and Sexual Abuse Centre
- Coventry Schools Football Association
- Coventry Schools Rugby Union
- Coventry Sports Foundation
- Coventry University Enterprises Ltd
- CRB Cunninghams
- Create Onsite Limited
- Creative Learning Solutions
- Daisy Communications
- DB Education
- Department for Education
- Department of Health and Social Care
- eCadets
- Edge Hill University – Every Child Counts
- Elite Dance Academy
- Espresso
- Evolve
- Facebook
- Fig Leaf Promotions – Maths No Problem
- First News UK Ltd
- Focus Educational Software Ltd
- Fronting The Challenge Projects Ltd – Thrive
- Fun for Kids
- Game – On Coaching
- Ginger Labs
- Go Noodle
- Google

- H& A Learning Ltd – Hegarty Maths
- H Tempest – Tempest Photography
- Herts for Learning
- Highly Sprung Performance Company
- Intrepica UK Limited t/a Literacy Planet
- Image Plus
- Instagram
- InVentry Solutions Ltd
- IRIS Connect Ltd
- Jigsaw PHSE Ltd
- Just Maths Ltd
- Konflux Theatre Ltd
- Layfayette Photography
- Lens Art Photography
- Libresoft t/a Harrap Computer Systems Ltd
- Linguascope
- Literacy Planet
- Lquidlogic Ltd
- MathsBox
- Maths Circle Ltd
- Maths Watch
- Micro Librarian Systems Limited
- Minecraft
- NHS
- National Centre for Excellence in the Teaching of Mathematics
- New Era Education – DB Primary
- Northampton Trampoline Gymnastics Academy
- Ocado Innovation Ltd t/a Ocado Technology
- OCR – Oxford, Cambridge and RSA
- Operation Encompass UK
- Optimum Reports
- Oxford University Press
- Padlet Inc
- Papercut
- Paxton Access Ltd
- PE Passport
- Pearson Education
- Pearson Activlearn
- Pepper Therapy Limited
- Peripatetic Teachers e.g. sports, music etc...
- PicCollage
- Plan Communications Ltd
- Pobble Education
- Public Health England
- Purple Mash
- Rainbow Bereavement Support GB
- Relate
- Rob Drakely Photography
- Rivers of Living Waters Gymnastics Club Coventry
- Ruth Miskin Literacy Limited
- Sacred Heart Rise and Shine
- SPaG.com
- School Business Service
- Schoolzone.co.uk Ltd
- SCOMIS
- Scratch
- Seesaw Learning Inc
- Senso
- Shadow Puppet Inc
- SIMS Cloud
- Sing Up Ltd
- SISRA
- Skoolbo UK Ltd
- Social Services
- Soundbite Learning
- Spectrum Music
- Speechlink Multimedia Ltd
- Spellzone Ltd
- SSS Learning
- Streetwise
- Survey Monkey (Parent survey)
- Tangney Tours
- Teach my monster to read
- The Brilliant Club
- The English Schools Football Association
- The Foundation Stage Forum Ltd
- The Kenelm Youth Trust
- The PiXL Club Ltd
- The UK Mathematics Trust
- Third Space Learning
- Time to talk
- Trello Inc
- Tutor2u Ltd
- Twinkl Ltd
- Twitter Inc
- University of Cambridge Local Exams Syndicate
- Vimeo Inc
- Welfare Call (LAC) Ltd
- West Midlands Police
- West Midlands County Schools Athletic Association
- We Transfer
- WizKidz
- WJEC CBAC Ltd
- Xero
- You Tube LLC
- Young Voices

From time to time we may also share pupil attainment data with local partnership schools in order to improve the teaching and learning we offer.

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 Academy Trust 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 Academy Trust complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the Academy Trust are required to retain the information.

A copy of those schedules can be located using the following link: <https://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**

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

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 September 2020

**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 Full Name	The Education (information about Individual Pupils) (England) Regulations 2013 Regulation 3 (2)	n/a	Third parties listed above  School to which pupil has transferred	Legal Obligation, Public Task
Pupil Gender	The Education (information about Individual Pupils) (England) Regulations 2013 Regulation 3 (2)	n/a	Third parties listed above  School to which pupil has transferred	Legal Obligation, Public Task
Pupil Date of Birth	The Education (information about Individual Pupils) (England) Regulations 2013 Regulation 3 (2)	n/a	Third parties listed above  School to which pupil has transferred	Legal Obligation , Public Task
Home Address	The Education (information about Individual Pupils) (England) Regulations 2013 Regulation 3 (2)	n/a	Third parties listed above  School to which pupil has transferred	Legal Obligation, Public Task,

Information Type	Relevant legislation	Special Category– additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
First Language	The Education (information about Individual Pupils) (England) Regulations 2013	n/a	Third Parties Listed above  School to which pupil has transferred	Legal Obligation, Public Task
Medical/Dietary/ Allergies	The Education (information about Individual Pupils) (England) Regulations 2013	Necessary for preventative or occupational medicine	Department for Education – school census. Other schools – when pupils transfers.  School to which pupil has transferred	Legal Obligation & Vital Interest.
Date of Admission to school	The Education (information about Individual Pupils) (England) Regulations 2013	n/a	Local Authority  School to which pupil has transferred	Legal Obligation
Last school attended – name and address	The Education (Pupil Information) (England) regulations 2005  Regulation 5	n/a	Local Authority  School to which pupil has transferred	Legal Obligation
National curriculum year group	The Education (information about Individual Pupils) (England) Regulations 2013  Regulation 3 (2)	n/a	Local Authority  School to which pupil has transferred  Third Parties Listed above	Legal Obligation, Public Task



Information Type	Relevant legislation	Special Category– additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Unique Pupil Number	The Education (information about Individual Pupils) (England) Regulations 2013  <b>Regulation 3 (2)</b>	n/a	Local Authority  School to which pupil has transferred	Legal Obligation
			CAPITA	Public Task
Eligibility for Free School Meals	The Education (information about Individual Pupils) (England) Regulations 2013  <b>Regulation 3 (2)</b>	n/a	Local Authority  School to which pupil has transferred	Legal Obligation
			123 Comms Ltd	Public Task
Mode of travel to school (if applicable)	The Education (information about Individual Pupils) (England) Regulations 2013  <b>Regulation 3 (2)</b>	n/a	Local Authority  School to which pupil has transferred	Legal Obligation
			CAPITA	Public Task
Proficiency in English	The Education (information about Individual Pupils) (England) Regulations 2013  <b>Regulation 3 (2)</b>	n/a	Local Authority  School to which pupil has transferred  DFE (School Census)	Legal Obligation

Information Type	Relevant legislation	Special Category– additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Safeguarding Information	Education Act 2002, section 175  Children’s Act 1989 Section 17,47,83  Children’s Act 2004 Section 11	n/a	Local Authority  School to which pupil has transferred	Legal Obligation
Whether a pupil is looked after and the Local Authority by whom the pupil is looked after	The Education (information about Individual Pupils) (England) Regulations 2013 Regulation 3 (2)	n/a	Local Authority  School to which pupil has transferred	Legal Obligation
Where a pupil has been but is no longer looked after, the type of order resulting in them no longer being looked after	The Education (information about Individual Pupils) (England) Regulations 2013 Regulation 3 (2)	n/a	Local Authority  School to which pupil has transferred	Legal Obligation
Special Educational Needs status, start date, details of needs and provision	The Education (information about Individual Pupils) (England) Regulations 2013 Regulation 3 (2)	n/a	Local Authority  School to which pupil has transferred	Legal Obligation

Information Type	Relevant legislation	Special Category– additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Admissions Register	Education (Pupil Registration) (England) Regulations 2006, Regulation 4, 10, 11, 14 and 15	n/a	OFSTED, Local Authority	Legal Obligation
Details of exclusions: start and end dates, number of sessions, fixed length/permanent and reason for exclusion	The Education (information about Individual Pupils) (England) Regulations 2013 Regulation 3 (2)	n/a	Local Authority  School to which pupil has transferred	Legal Obligation
Assessment date – end of key stage and Year 1 phonics screening	The Education (Pupil Information) (England) regulations 2005	n/a	Local Authority  School to which pupil has transferred	Legal Obligation
Educational Record	The Education (Pupil Information) (England) regulations 2005	n/a	Local Authority  School to which pupil has transferred	Legal Obligation
Attendance records including whether absence was authorised/ unauthorised and reason for absence	The Education (information about Individual Pupils) (England) Regulations 2013 Regulation 3 (2)	n/a	Local Authority  School to which pupil has transferred	Legal Obligation

Information Type	Relevant legislation	Special Category– additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
School Census	Education Act 1996, Sections 537, & 537A and accompanying regulations	n/a	Department for Education	Legal Obligation
Parents' names and addresses	The Education (Pupil Information) (England) regulations 2006 Regulation 5 (1) (c)	n/a	Local Authority School to which pupil has transferred	Legal Obligation
Parents' telephone number (if pupil usually resides with them)	The Education (Pupil Information) (England) regulations 2006 Regulation 5 (1) (c)	n/a	Local Authority School to which pupil has transferred	Legal Obligation
Emergency Contact Details	Education (information about individual pupils) (England) Regulations 2013, Regulation 5.	n/a	Healthcare professionals or emergency services	Vital Interest
Pupil assessment data (Curricular record)	The Education (Pupil Information) (England) Regulations 2005 Regulation 4	n/a	CAPITA SISRA Herts for Learning Optimum Reports The PiXL Club	Public Task

**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 including allergies.	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent	Emergency Services	Vital interests.
Safeguarding and promoting welfare of pupils.	n/a	Local Authority Police Health and Welfare Professionals	Legal Obligation and vital interest.
Religious Belief	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

**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 Full Name	n/a	Third parties listed above School to which pupil has transferred	Consent
Pupil Gender	n/a	Third parties listed above School to which pupil has transferred	Consent
Pupil Date of Birth	n/a	Third parties listed above School to which pupil has transferred	Consent
Home Address	n/a	Third parties listed above School to which pupil has transferred	Consent
First Language	n/a	Third parties listed above School to which pupil has transferred	Consent
Religion	Data Subject has given explicit consent	Local Authority School to which pupil has transferred Birmingham Diocesan Education Service	Consent
Ethnicity	Data Subject has given explicit consent	Local Authority School to which pupil has transferred	Consent

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
National Identity, Country of Birth, Nationality	n/a	Local Authority School to which pupil has transferred	Consent
Parent contact details	n/a	Third parties listed above School to which pupil has transferred	Consent
Pupil Images (including video recordings)	n/a	CAPITA SCOMIS Inventry Solutions Ltd School Photographers as detailed above Local and National Media Advent Communications Public Relations and Media Services We Transfer Social Media e.g. Facebook, Twitter, Instagram, You Tube Biostore Iris Connect Ltd	Consent
Parent name, date of birth, National Insurance Number, 30 hours eligibility code (Nursery)	n/a	Third parties listed above School to which pupil has transferred	Consent

**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
Pupil information i.e. name, Parent detail, Emergency Contact details	n/a	Third parties listed above School to which pupil has transferred	Legal Obligation
Academic Progress data	n/a	Local Authority CAPITA SISRA Herts for Learning Optimum Reports The PIXL Club Ltd	Public Task and Legal Obligation
Safeguarding information, Medical, Special Education needs	Necessary for preventative or occupational medicine	CAPITA SCOMIS 4C Software CPOMS CAHMS Department of Health and Social Care NHS Emergency Services Peripatetic Teachers Caterlink	Public Task & Legal Obligation



Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Educational and Safeguarding Information used internally for the purpose of educating and protecting the welfare of children.	n/a	CAPITA SCOMIS 4C Software CPOMS Department of Health and Social Care NHS Emergency Services Peripatetic Teachers	Public Task & Legal Obligation
Dietary restrictions	Necessary for preventative or occupational medicine	Caterlink	Vital Interest
Medical information including allergies	Necessary for preventative or occupational medicine	Caterlink NHS Emergency Services	Vital Interest