The Federation of St Paul and St Martin of Porres Catholic Primary Schools

Where faith and futures flourish

Privacy Notice (Parents and Pupils)
July 2026

Originator	Judicium Consulting
Status	Statutory
Governor Responsible	Nick Dickson
Signed by	Nick Dickson
Ratified on	June 2026
Review period	Annually
Last reviewed	2018

The Federation of St Paul and St Martin of Porres Catholic Primary Schools was established on 1st September 2021 and whilst the two schools of St Paul's Catholic Primary School and St Martin of Porres Catholic Primary School operate as two separate schools they are overseen by a single governing body. The Federation of St Paul and St Martin of Porres Catholic Primary Schools will be herein referred to as 'the Federation'.

1.0 INTRODUCTION

The Federation collects, holds, uses and shares information about our pupils and their families. This is known as "personal data" and you have rights around that data, including knowing how and why we are processing the data. "Processing" data means from collecting, storing, using, sharing and disposing of it. This means that we are responsible for deciding how we hold and use personal information about pupils and parents. Under data protection legislation, we are required to notify you of the information contained in this privacy notice.

This notice does not form part of any contract to provide services and we may update this notice at any time.

It is important that you read this notice with any other policies mentioned within this privacy notice, so that you are aware of how and why we are processing your information, what your rights are under data protection legislation and the procedures we take to protect your personal data.

For the purposes of data protection legislation **St Paul's Catholic Primary School** and **St Martin of Porres Catholic Primary School** are the 'data controllers' and are individually registered as such with the Information Commissioner's Office.

2.0 PERSONAL DATA WE HOLD

We may collect, store and use the following categories of personal information about you:

- Your name, pupil number, date of birth, gender and contact information;
- Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses;
- Characteristics (such as language, and free school meal eligibility);
- Attendance details (such as sessions attended, number of absences and reasons for absence);
- Performance and assessment information;
- Behavioural information (including exclusions);
- Extended Day, e.g. extra-curricular club group information
- Images of pupils engaging in school activities.
- Information about the use of our IT, communications and other systems, and other monitoring information;
- Correspondence and complaints

We may also collect, store and use the following more sensitive types of personal information:

- Information about your race or ethnicity, religious or philosophical beliefs

- Information about your health, including any medical conditions and sickness records.
- Special educational needs (including the needs and ranking)
- Safeguarding Information – e.g. court order and professional involvement
- Free school mean eligibility
- Pupil premium funding

3.0 HOW WE COLLECT THIS INFORMATION

Personal information is collected via the following methods;

- Admissions Forms
- Common Transfer File (CTF) from a previous school
- Pre-school reports
- Child Protection Plans (if applicable)
- Education, Health & Care Plans (if applicable)

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. To comply with the UK GDPR, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

3.1 WHY WE USE THIS DATA

We will only use your personal information when the law allows us to do so. Most commonly, we will hold pupil data and use it for:

- Pupil selection (and to confirm the identity of prospective pupils and their parents);
- Providing education services and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Informing decisions such as the funding of schools;
- Assessing performance and to set targets for schools;
- Safeguarding pupils' welfare and providing appropriate pastoral (and where necessary medical) care;
- Support teaching and learning;
- Giving and receive information and references about past, current and prospective pupils, and to provide references to potential employers of past pupils;
- Managing internal policy and procedure;

- Enabling pupils to take part in assessments, to publish the results of examinations and to record pupil achievements;
- To carry out statistical analysis for diversity purposes;
- Legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care;
- Enabling relevant authorities to monitor the school's performance and to intervene or assist with incidents as appropriate;
- Monitoring use of the school's IT and communications systems in accordance with the school's IT security policy;
- Making use of photographic images of pupils in school publications, on the school website and on social media channels;
- Security purposes, including CCTV; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

3.2 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.

4.0 THE LAWFUL BASIS FOR USING THIS INFORMATION

We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Consent: the individual has given clear consent to process their personal data for a specific purpose;
- Contract: the processing is necessary for a contract with the individual;
- Legal obligation: the processing is necessary to comply with the law (not including contractual obligations);
- Vital interests: the processing is necessary to protect someone's life.
- Public task: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law; and
- The Education Act 1996: for Departmental Censuses 3 times a year. More information can be found at: https://www.gov.uk/education/data-collection-and-censuses-for-schools.

We mainly use pupils' personal data to comply with legal obligations and to perform tasks carried out in the public interest Please note that we may process information without knowledge or consent, where this is required or permitted by law.

4.1 HOW WE USE SENSITIVE PERSONAL INFORMATION

Special categories of particularly sensitive personal information, such as information about your health, racial or ethnic origin, sexual orientation, or biometrics (as defined under UK GDPR as "special category data") require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations in line with our data protection policy.
- For reasons of substantial public interest, such as for equal opportunities monitoring.
- Where necessary to establish, exercise or defend legal claims;
- Where necessary to protect your vital interests (or those of another person) and you are unable to consent.

5.0 HOW WE STORE THIS DATA

Except as otherwise permitted or required by applicable law or regulation, the school only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

Information about how we retain information can be found in our Data Retention Policy. A copy of this document is available from the school office.

We have put in place measures to protect the security of your information (i.e., against it being accidentally lost, used or accessed in an unauthorised way). In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

You can find further details of our security procedures within our Data Breach Policy and our Information Security Policy, which are available on our websites (see below) or from the school offices.

It is important that the personal information we hold about you is accurate and current. Please keep us information if yours or your child's personal information changes while your child attends our school.

6.0 SHARING DATA

We may need to share your data with third parties where it is necessary. There are strict controls on who can see your information. We will not share your data if you have advised us that you do not want it shared unless we have compelling reasons to continue sharing it which override your rights and interests, it's the only way we can make sure you stay safe and healthy, or we are legally required to do so.
We share pupil information with:

- the Department for Education (DfE) - on a statutory basis under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013;
- Ofsted;
- Other Schools that pupils have attended/will attend;
- NHS;
- Welfare services (such as social services);
- Law enforcement officials such as police, HMRC;
- Local Authority Designated Officer;
- Professional advisors such as lawyers and consultants;
- Support services (including insurance, IT support, information security, catering);
- Providers of learning software such as [e.g., Timetables Rockstar];
- The Local Authority;

Information will be provided to those agencies securely and/or anonymised where possible. The recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law.

6.1 TRANSFERRING DATA INTERNATIONALLY

Where we transfer your child's personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.
In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

7.0 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 NPD, go to https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information.
The department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data?
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.
For more information about the department's data sharing process, please visit:
https://www.gov.uk/data-protection-how-we-collect-and-share-research-data
For information about which organisations the department has provided pupil information, (and for which project), please visit the following website:
https://www.gov.uk/government/publications/national-pupil-database-requests-received

To contact DfE: https://www.gov.uk/contact-dfe
Under data protection legislation, 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 education record, contact the relevant school office.

8.0 YOUR RIGHTS

8.1 HOW TO ACCESS PERSONAL INFORAMTION THAT WE HOLD ABOUT YOUR CHILD
Under certain circumstances, by law you have the right to:

- Access your personal information (commonly known as a "subject access request"). This allows you to receive a copy of the personal information we hold about you and to check we are lawfully processing it. You will not have to pay a fee to access your

personal information. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.
- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it.
- Restriction of processing your personal information. You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
- To object to processing in certain circumstances (for example for direct marketing purposes).
- To transfer your personal information to another party.

If you want to exercise any of the above rights, please contact the relevant school office at where we will work with our Data Protection Officer (DPO).
We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights).

8.2 RIGHT TO WITHDRAW CONSENT

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the relevant school office. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

9.0 CONTACT

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with the relevant school office in the first instance. We will acknowledge receipt of your complaint within 30 calendar days, and we will investigate and respond without undue delay.

Office Contact Details

St Paul's Catholic Primary School - adminstpauls@stpm.org.uk
St Martin of Porres Catholic Primary School - adminstmartins@stpm.org.uk

Further information about the way we handle data protection complaints can be found in our Data Protection Policy, available at either –

St Paul's Catholic Primary School - https://www.stpaulswoodgreen.org.uk/Policies/

St Martin of Porres Catholic Primary School - https://www.stmartinofporres.co.uk/Policies/

We have appointed a data protection officer (DPO) in each school to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by the school then you can contact the DPO on the details below:

St Paul's Catholic Primary School
Data Protection Officer: TurnItOn Ltd
Address: Unit 1F, Network Point, Range Road, Witney, Oxfordshire, OX29 0YN
Email: dpo@turniton.co.uk
Web: www.turniton.co.uk
Telephone: 01865 597629 (option 3)

St Martin of Porres Catholic Primary School
Data Protection Officer: Judicium Consulting Limited
Address: 5th Floor, 98 Theobalds Road, London, WC1X 8WB
Email: dataservices@judicium.com
Web: www.judiciumeducation.co.uk

Should you remain dissatisfied with our response, you also have the right to make a complaint to the Information Commissioner's Office (ICO), (https://ico.org.uk/make-a-complaint/) the UK supervisory authority for data protection issues.

10. CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.