



Privacy Notice (How We Use Pupil Information)

Completed: July 2026

Approved by Governors: _____

Review Date: July 2028

Introduction

St Joseph's RC Primary School is committed to protecting the privacy and security of personal information relating to our pupils and families.

This privacy notice explains how we collect, use, store and share pupil information.

We process personal information in accordance with:

- the UK General Data Protection Regulation (UK GDPR);
- the Data Protection Act 2018;
- the Education Act 1996;
- other relevant education and safeguarding legislation.

This privacy notice explains:

- what pupil information we collect;
- why we collect and use pupil information;
- the lawful basis for processing information;
- who we share information with;
- how we keep information secure;
- the rights of parents and pupils regarding personal information.

The Categories of Pupil Information That We Collect, Hold and Share Include:

We collect, hold and process a range of information about our pupils to enable us to provide education, support wellbeing and meet our legal responsibilities.

Personal Information

This includes:

- pupil name;
- unique pupil number;

- date of birth;
- address;
- contact details;
- emergency contact details;
- admission information.

Characteristics Information

This includes:

- ethnicity;
- language;
- nationality;
- country of birth;
- religion or belief;
- eligibility for free school meals;
- special educational needs and disabilities (SEND).

Educational Information

This includes:

- attendance information;
- absence records and reasons;
- behaviour information;
- exclusion information;
- internal assessment information;
- statutory assessment results;
- progress information;
- reports and records relating to educational support.

Special Educational Needs and Disability (SEND) Information

This includes:

- SEND assessments;
- intervention records;
- reports from school staff;
- reports from external professionals;
- Education, Health and Care Plan (EHCP) information;
- support plans and reviews.

Health and Medical Information

This includes:

- medical conditions;
- allergies;
- medication information;
- healthcare plans;
- information required to support pupils safely in school.

Safeguarding Information

This includes:

- child protection records;
- safeguarding concerns;
- referrals and information shared with external agencies;
- records required to support pupil welfare.

Other Information

This may include:

- photographs and videos;
- CCTV images where applicable;
- information relating to the use of school ICT systems and approved digital platforms.

Why We Collect and Use Pupil Information

We use pupil information to:

- provide appropriate teaching and learning;
- support pupil progress and attainment;
- monitor attendance and behaviour;
- provide pastoral care and support wellbeing;
- identify and provide support for SEND;
- meet safeguarding responsibilities;
- administer admissions and school records;
- communicate with parents and carers;
- assess and improve the quality of education provided;
- comply with statutory duties;
- support the Catholic life of the school, including administration of the Sacramental Programme where appropriate.

The Lawful Basis on Which We Use This Information

Under the UK GDPR, schools must identify a lawful basis for processing personal information.

We only collect and use pupil information where the law allows us to.

The lawful bases we commonly rely upon are:

Legal Obligation

Processing is necessary for the school to comply with legal requirements.

Examples include:

- maintaining pupil records;
- safeguarding duties;
- attendance monitoring;
- statutory returns.

Public Task

Processing is necessary for the school to carry out its official functions in the public interest.

Examples include:

- providing education;
- supporting pupil development;
- managing school services.

Consent

In some circumstances, we may ask for consent to use pupil information.

Where we rely on consent:

- consent will be freely given;
- it will be specific and informed;
- parents/carers will be told how to withdraw consent.

Withdrawal of consent will not affect information already processed lawfully before consent was withdrawn.

Vital Interests

We may process information where it is necessary to protect the vital interests of a pupil or another person, for example in an emergency.

There may be more than one lawful basis that applies to the processing of pupil information.

Special Category Data

Some personal information is more sensitive and requires additional protection under the UK GDPR.

Special category data includes:

- racial or ethnic origin;
- religious or philosophical beliefs;
- health information;
- genetic data;
- biometric data used for identification purposes;
- information relating to sex life or sexual orientation;
- trade union membership.

Where we process special category data, we must identify:

- a lawful basis under Article 6 of the UK GDPR; and
- an additional condition under Article 9 of the UK GDPR.

We may process special category data where it is necessary:

- to protect pupil health and wellbeing;
- to meet safeguarding responsibilities;
- to provide appropriate educational support;
- to comply with legal obligations;
- for reasons of substantial public interest.

Collecting Pupil Information

Whilst the majority of information provided to us is mandatory, some information is provided on a voluntary basis.

Where information is voluntary, we will explain this clearly and inform parents/carers whether they are required to provide the information or whether they have a choice.

We collect pupil information from:

- parents and carers;
- previous schools;
- local authorities;
- other education providers;
- health professionals;
- safeguarding partners;
- other agencies where legally permitted.

How We Store Pupil Information

We hold pupil information securely and in accordance with our:

- Records Management Policy;
- Data Protection Policy;
- Information and Records Management guidance for schools.

Pupil information is stored securely in both electronic and paper formats.

We ensure that:

- access is restricted to authorised staff;
- electronic systems are password protected;
- confidential records are securely stored;
- information is only accessed when there is a legitimate educational or safeguarding reason.

We retain pupil information in accordance with statutory retention periods and our school

retention schedule.

When information is no longer required, it is securely deleted or destroyed.

Who We Share Pupil Information With

We routinely share pupil information with organisations where there is a legal basis or where sharing is necessary to provide education and support pupils.

This may include:

Schools and Education Providers

- schools that pupils attend after leaving St Joseph's RC Primary School;
- educational providers involved in supporting pupils.

Local Authority

We share information with Bolton Council where required by law or where necessary to support pupils.

This may include:

- safeguarding information;
- attendance information;
- SEND support;
- statutory returns.

Department for Education (DfE)

We share pupil information with the Department for Education on a statutory basis.

This supports:

- school funding;
- educational attainment monitoring;
- national education policy development.

Health and Support Services

Where appropriate and lawful, we may share information with:

- NHS services;
- health professionals;
- Early Intervention services;
- behaviour support services;
- safeguarding partners.

School Systems and Service Providers

We may share information with approved suppliers who provide services to the school, including:

- assessment systems;
- safeguarding systems;
- communication systems;
- ICT services;
- confidential waste disposal providers;
- school photographers.

All suppliers must have appropriate data protection arrangements in place.

Other Sharing Arrangements

We may share limited information for specific purposes, including:

- pupil names for approved educational visits and clubs;
- information required for the Sacramental Programme and communication with parish representatives;
- information required for safeguarding or legal purposes.

Why We Share Pupil Information

We do not share pupil information with others unless:

- we have consent;
- there is a legal requirement;
- sharing is necessary to protect a pupil or another person;
- sharing supports the education, welfare or safeguarding of a pupil.

We ensure that any information shared is:

- relevant;
- necessary;
- shared securely;
- only provided to authorised recipients.

Department for Education (DfE) Data Collection Requirements

The Department for Education (DfE) collects and processes pupil information from schools through statutory data collections.

Schools are required by law to provide certain pupil information to the DfE.

This information supports:

- education policy development;
- school funding;
- monitoring educational standards;
- statistical analysis.

Further information about DfE data collections can be found at:

The National Pupil Database (NPD)

The National Pupil Database (NPD) is managed by the Department for Education.

It contains information about pupils in schools in England and is used for statistical and research purposes.

Information supplied to the NPD may be used by approved organisations for:

- research;
- analysis;
- producing statistics;
- providing information and guidance to improve education and wellbeing.

The DfE has strict processes to ensure information is securely managed and only shared where appropriate.

Further information about the National Pupil Database can be found at:

<https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

Photographs and Videos

As part of school activities, we may take photographs and videos of pupils.

We use photographs and videos to:

- celebrate pupil achievements;
- support learning;
- communicate school activities;
- promote school events.

Where required, we will obtain appropriate consent before using photographs or videos for publicity purposes, including websites, newsletters or social media.

Consent can be withdrawn at any time.

Photographs and videos will only be used in accordance with our agreed permissions and safeguarding procedures.

Requesting Access to Your Personal Data

Under data protection legislation, parents/carers and pupils have the right to request access to personal information that the school holds about them.

This is known as a **Subject Access Request (SAR)**.

To request access to personal information, or to request access to a pupil's educational record, please contact:

Mrs Balsamo

St Joseph's RC Primary School
Shepherd Cross Street
Bolton
BL1 3EJ

Your Data Protection Rights

Under the UK GDPR, individuals have rights relating to their personal information.

These include the right to:

- request access to personal information held about them;
- request that inaccurate information is corrected;
- request that information is deleted in certain circumstances;
- request restrictions on how information is used in certain circumstances;
- object to certain types of processing;
- withdraw consent where processing is based on consent.

Some rights may be limited where the school has a legal obligation to continue processing information, for example safeguarding or statutory education requirements.

Raising Concerns

If you have concerns about the way we collect or use personal information, please contact the school in the first instance.

If you remain dissatisfied, you have the right to make a complaint to the Information Commissioner's Office (ICO).

Information about making a complaint can be found at:

<https://ico.org.uk/concerns/>

Data Protection Officer

The Data Protection Officer for St Joseph's RC Primary School is provided by Global Policing Ltd.

The Data Protection Officer is responsible for advising the school on data protection matters and monitoring compliance with data protection legislation.

If you have questions about this privacy notice, how we use personal information, or wish

to exercise your data protection rights, please contact:

Global Policing Ltd

Email: data@globalpolicing.co.uk

Telephone: 0161 510 2999

DPO Contact:

Shane Williams
Unit 2, The Pavilions
Bridge Hall Drive
Bury
BL9 7NX

Further Information

If you would like to discuss anything in this privacy notice, please contact:

Mrs Balsamo

St Joseph's RC Primary School
Shepherd Cross Street
Bolton
BL1 3EJ

or

Data Protection Officer

Global Policing Ltd
Email: data@globalpolicing.co.uk
Telephone: 0161 510 2999

Bolton Council Contact Information

If you cannot access any of the websites referred to in this privacy notice, you can contact Bolton Council:

Information Management Unit

Department of People
Bolton Council
1st Floor, Town Hall
Bolton
BL1 1UA

Website: www.bolton.gov.uk

Email: ec.imu@bolton.gov.uk

Review

This privacy notice will be reviewed regularly and updated when there are changes to:

- data protection legislation;
- Department for Education requirements;
- school procedures;
- the way we process pupil information.

Review Date: July 2028
