



St. Swithun Wells Catholic Primary School

As **disciples of Jesus**, we grow in **friendship** and in our **love of learning**, and we seek to **care for others**.

"I have called you by your name. You are mine." Isaiah 43:1

Privacy Notice – Pupils, Parents and Carers

Date of policy: September 2026

Review date: September 2027

Responsible person: Anne-Marie Jordan, Headteacher and Data Protection Officer

Applies to: Pupils, parents and carers

1. Introduction

St Swithun Wells Catholic Primary School is committed to protecting the privacy and security of the personal information that we hold about our pupils, parents and carers.

This Privacy Notice explains what personal information we collect, why we collect it, how we use it, who we may share it with, how we keep it secure and the rights that individuals have in relation to their personal information.

We process personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Data (Use and Access) Act 2025 and other relevant legislation and statutory guidance.

This notice should be read alongside our other relevant policies and procedures, including our Data Protection Policy, Safeguarding and Child Protection Policy, Online Safety arrangements and our records retention arrangements.

2. Who is responsible for your information?

St Swithun Wells Catholic Primary School is the data controller for the personal information that we collect and use about our pupils, parents and carers.

The school is responsible for deciding how and why personal information is processed, subject to the requirements of data protection law.

Data Protection Officer

Our Data Protection Officer is:

Anne-Marie Jordan, Headteacher and Data Protection Officer

The Data Protection Officer can be contacted through the school's usual contact details:

St Swithun Wells Catholic Primary School

Telephone: 02380 266210

Email: adminoffice@st-swithunwells.hants.sch.uk

3. What personal information do we collect?

We collect and use different types of personal information depending on our relationship with you and your child.

Information about pupils

- name, date of birth and gender
- home address and contact details
- parent/carer details and family relationships
- emergency contact information
- admission and registration information
- unique pupil number
- attendance and absence information
- punctuality information
- assessment and attainment information
- educational records
- behaviour and relationships information
- safeguarding information
- information relating to special educational needs and disabilities
- information about children who may be vulnerable or require additional support
- medical and health information where necessary
- allergy and medication information
- information about dietary requirements
- photographs, videos and other images where appropriate
- information relating to school trips, activities, clubs and enrichment opportunities
- information relating to exclusions or other statutory processes where applicable
- information relating to children looked after or previously looked after, where applicable
- information relating to the use of school systems and technology
- information needed to support online safety, filtering and monitoring
- information contained within safeguarding and pastoral records.

Information about parents and carers

- names and contact details
- addresses
- relationship to the child
- parental responsibility information
- emergency contact details
- information provided when communicating with the school
- information necessary to support a child's education, welfare, attendance or safeguarding
- information relating to payments, clubs, trips or school services where applicable.

4. Special category information

Some of the information we process is particularly sensitive and is known as special category personal data.

This may include information about:

- health and medical needs
- allergies and medication
- special educational needs and disabilities
- ethnicity
- religious beliefs or information revealing religious beliefs
- information concerning safeguarding or welfare where this involves special category data.

We only process this information where the law allows us to do so and where appropriate safeguards are in place.

For example, health and allergy information may be processed so that we can keep children safe and respond appropriately to medical needs. Information about religious belief may be processed as part of the school's Catholic identity and the provision of religious education, prayer and liturgy.

5. Why do we collect and use personal information?

We collect and use personal information to enable us to:

- provide a safe, effective and appropriate education
- support pupils' learning, progress and development
- meet our safeguarding and child protection responsibilities
- monitor attendance and punctuality and support children and families where attendance is a concern
- identify and support children who have additional needs
- provide pastoral care and support
- administer admissions and school places
- maintain accurate pupil and family records
- communicate with parents and carers
- administer school activities, clubs, trips and events
- manage medical needs, allergies and medication
- comply with our legal and statutory responsibilities
- meet our responsibilities under education, attendance and safeguarding legislation
- monitor and improve the quality of education provided
- manage school finances and services
- maintain the security of our premises, systems and information
- investigate concerns, complaints and incidents
- fulfil our responsibilities as a Catholic school, including providing religious education, prayer, liturgy and opportunities for pupils to participate in the religious life of the school
- work with other organisations where this is necessary to support a child or fulfil a legal responsibility.

6. Our lawful bases for using personal information

Data protection law requires us to have a lawful basis for processing personal information.

Depending on the circumstances, we may rely on one or more of the following lawful bases:

Legal obligation

We process information where we are required to do so by law. This includes statutory duties relating to education, attendance, safeguarding, admissions, assessment and reporting.

Public task

We process information where it is necessary for us to carry out our functions in the public interest or in the exercise of official authority.

Vital interests

In limited circumstances, we may process information where this is necessary to protect someone's life or prevent serious harm.

Legitimate interests

Where appropriate and where the law permits, we may process information because it is necessary for a legitimate interest, provided that this does not unfairly override the rights and freedoms of the individual.

Consent

In some circumstances we may ask for consent. Where we rely on consent, it will be clear what the consent relates to and consent can normally be withdrawn.

We do not generally rely on consent as the lawful basis for processing information that we are required to process as part of our statutory duties.

7. How we use children's information

Children's personal information requires particular care.

We recognise that children have their own data protection rights and that information provided to children should be accessible and understandable.

We will explain privacy and the use of personal information to pupils in an age-appropriate way and encourage children to ask questions about how their information is used.

We take particular care when processing information relating to safeguarding, health, SEND and other sensitive matters.

8. Who do we share personal information with?

We only share personal information where there is a lawful basis for doing so and where sharing is necessary and proportionate.

Depending on the circumstances, information may be shared with:

- Hampshire County Council
- the Department for Education (DfE)
- other education providers when a pupil transfers school
- education and examination organisations
- health professionals and NHS services
- school nursing and other appropriate health services

- children's social care
- Hampshire Safeguarding Children Partnership and other safeguarding agencies
- the police or other emergency services where appropriate
- SEND and inclusion services
- educational psychologists and other specialist professionals
- attendance and education welfare services
- other local authority services
- our school's governing body where appropriate
- school meal, transport or other service providers where necessary
- IT, software and education technology providers acting on our behalf
- wraparound care providers where appropriate
- other organisations where the law requires or permits us to share information.

We will not routinely share personal information with organisations simply because they request it. We will consider the lawful basis, necessity and appropriateness of any sharing.

Where another organisation processes personal information on our behalf, we will ensure appropriate contractual and security arrangements are in place.

9. Safeguarding and information sharing

Keeping children safe is one of the school's most important responsibilities.

Information may be shared without consent where this is necessary and lawful to safeguard a child or prevent harm.

This may include sharing information with children's social care, the police, health services, the local authority or other safeguarding partners.

We will follow relevant safeguarding legislation, statutory guidance and local safeguarding arrangements when making decisions about information sharing.

Safeguarding information is recorded and stored securely, including through our safeguarding recording system, CPOMS, with access restricted to those who need it for safeguarding purposes.

10. Information shared with the Department for Education

Schools are required to provide certain information to the Department for Education and other statutory bodies.

This may include information collected through statutory data collections such as the school census, attendance data and information relating to pupil characteristics, attainment and educational provision.

The Department for Education uses information collected from schools for purposes including funding, planning, accountability, monitoring education policy and research.

The school will provide information required by law or statutory guidance and will follow the relevant requirements governing these data collections.

11. Photographs, videos and images

We may take photographs and videos of pupils as part of school activities, events, learning and celebrations.

Where appropriate, we will seek consent for uses that require consent. We will explain how images will be used and will respect any restrictions or permissions that have been provided.

The school takes particular care when publishing images of children online. We do not publish full-face photographs of children on the school's public website or Facebook page.

Photographs and videos will only be used, stored and shared in accordance with our data protection requirements and the permissions and arrangements that apply.

12. CCTV, filtering and monitoring

Where CCTV is used on school premises, it is operated for purposes including safety, security and safeguarding.

The school also uses filtering and monitoring systems to help protect children when using school technology and online services.

Filtering and monitoring arrangements are part of our safeguarding responsibilities and are operated in accordance with relevant guidance and school procedures.

13. Use of school systems and technology

We use a range of digital systems to support education, administration, safeguarding and communication.

These include:

Arbor – used for pupil administration, attendance, parent/carers information, communication and other school management functions.

CPOMS – used to securely record and manage safeguarding, child protection, pastoral and welfare information.

We may also use other educational, administrative and communication systems where necessary to support the operation of the school and the education and safeguarding of pupils.

Personal information will only be entered into systems where there is a legitimate educational, administrative, safeguarding or legal purpose for doing so.

Where third-party organisations process information on behalf of the school, appropriate contractual and data protection arrangements will be in place.

14. How do we keep personal information secure?

We take appropriate technical and organisational measures to protect personal information from:

- unauthorised access

- accidental loss
- inappropriate disclosure
- alteration
- destruction
- other unlawful processing.

Access to personal information is restricted to staff and other authorised individuals who have a legitimate need to access it.

Staff receive appropriate data protection and information security training and are expected to follow the school's policies and procedures.

15. How long do we keep personal information?

We retain personal information only for as long as it is necessary and in accordance with applicable legislation and our records retention arrangements.

St Swithun Wells Catholic Primary School follows the Hampshire Schools Retention Schedule, which sets out appropriate retention periods for different categories of school records.

Some information must be retained for specified periods because of statutory, safeguarding, financial or legal requirements.

When information is no longer required, it will be securely deleted, destroyed or disposed of in accordance with our retention arrangements.

16. International transfers

Some of the organisations we use to provide digital services may process personal information outside the United Kingdom.

Where personal information is transferred outside the UK, we will ensure that the transfer is lawful and that appropriate safeguards are in place in accordance with UK data protection law.

17. Automated decision-making and profiling

The school does not routinely make decisions about pupils or parents based solely on automated processing where those decisions have legal or similarly significant effects.

Where automated tools are used to support school processes, appropriate human oversight will be maintained.

18. Your data protection rights

Data protection law gives individuals a number of rights in relation to their personal information.

Depending on the circumstances, these include the right to:

- be informed about how personal information is used
- access personal information

- ask for inaccurate information to be corrected
- request deletion of information in certain circumstances
- ask for processing to be restricted in certain circumstances
- object to certain processing
- request data portability in certain circumstances
- have rights relating to automated decision-making and profiling.

Not all rights apply in every situation. Some rights are subject to legal exemptions, particularly where information relates to safeguarding or other important legal responsibilities.

19. Requests for personal information

If you wish to exercise your data protection rights, please contact:

Anne-Marie Jordan, Data Protection Officer
 St Swithun Wells Catholic Primary School
 Telephone: 02380 266210
 Email: adminoffice@st-swithunwells.hants.sch.uk

Requests for access to personal information are known as Subject Access Requests (SARs).

We may need to verify the identity of the person making a request and may need to consider the rights of other individuals before information can be disclosed.

We will respond within the timescale required by data protection law.

20. Complaints

If you have concerns about the way we are using your personal information, we encourage you to contact the school in the first instance.

Anne-Marie Jordan, Data Protection Officer
 St Swithun Wells Catholic Primary School
 Telephone: 02380 266210
 Email: adminoffice@st-swithunwells.hants.sch.uk

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

Information Commissioner's Office
 Wycliffe House
 Water Lane
 Wilmslow
 Cheshire
 SK9 5AF

Telephone: 0303 123 1113

Website: ico.org.uk

21. Changes to this Privacy Notice

We regularly review this Privacy Notice to ensure that it accurately reflects how we process personal information and any changes in data protection law.

This notice will be reviewed at least annually and sooner where there are significant changes to the way we process personal information.

Where significant changes affect the way we use personal information, we will take reasonable steps to bring those changes to the attention of the people affected.

This Privacy Notice was last reviewed: September 2026.

Next review: September 2027.