



*Achieving together in faith*

## **Holy Cross Catholic MAC**

### **Privacy Notice: Parents and Pupils**

**2024 – 2025**

Responsible for Policy	Chris Connoll
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**Document Control:**

**Version History**

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1.0	Draft	09/2019	M Alcott	HCCMAC, Central Team	Creation of document from a template
	Draft	02/09/2020		MAC Resources Committee	<b>Approved</b>
2.0	Draft	09/2023	C Connoll	HCCMAC, Central Team	Updates to all sections including tables.
		18/10/2023		MAC Resources Committee	For Approval
2.1	Draft	08/2024	C Connoll	HCCMAC, Central Team	No Updates
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2.1	<b>Approved</b>	16/10/2024		MAC Resources Committee	Approved

## Privacy Notice for Parents and Pupils

### How we use your information

#### 1. Who are we?

Holy Cross Catholic MAC 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:

- Bishop Ullathorne Catholic School
- Cardinal Newman Catholic School
- Christ the King Catholic Primary School
- St Augustine's Catholic Primary School
- St Elizabeth's Catholic Primary School
- St John Vianney Catholic Primary School
- St Thomas More Catholic Primary School

Holy Cross Catholic MAC is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number **ZA553195**

You can contact Holy Cross Catholic MAC as the Data Controller in writing at:

#### **DPO - Data Controller**

Holy Cross Catholic MAC,  
Heathcote Street,  
Radford,  
CV6 3BL

Email: [DPO@hcmac.co.uk](mailto:DPO@hcmac.co.uk)

Tel: 02475 186 555

You can contact Holy Cross Catholic MAC Data Protection Officer in writing at:

#### **School Data Protection Officer**

Warwickshire Legal Services  
Warwickshire County Council  
Shire Hall  
CV34 4RL

Email: [schooldpo@warwickshire.gov.uk](mailto:schooldpo@warwickshire.gov.uk)

#### 2. 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 data subjects.

#### 3. 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.

#### **4. Policy Statement**

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 data subjects, 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.

#### **5. 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.

## 6. 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

## 7. 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.

## 8. 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:

### a. 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 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.

### b. 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**.

### c. 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**.

**d. 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**.

**9. 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:

- a. Explicit consent of the data subject
- b. Processing relates to personal data which is manifestly made public by the data subject
- c. Necessary for establishing, exercising or defending legal claims
- d. Necessary for reasons of substantial public interest
- e. Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
- f. 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.

**10. 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> .

**11. 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).

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

We will hold information relating to our Parents and Pupils only for as long as necessary. How long we need to hold on to any information will depend on the type of information. For further detail, please see our Data Retention Policy.

## **13. 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.

## **14. What are your rights with respect of your personal information?**

Under data protection law, Directors and Local Governing Body Members have the right to request access to information about them that we hold. To make a request for your personal information contact the MAC Data Protection Officer.

### **DPO - Data Controller**

Holy Cross Catholic MAC,  
Heathcote Street,  
Radford,  
CV6 3BL  
Email: [DPO@hcmac.co.uk](mailto:DPO@hcmac.co.uk)  
Tel: 02475 186 555

### **School Data Protection Officer**

Warwickshire Legal Services  
Warwickshire County Council  
Shire Hall  
CV34 4RL  
Email: [schooldpo@warwickshire.gov.uk](mailto:schooldpo@warwickshire.gov.uk)

**\*\*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

## 15. Concerns

If an individual has any concerns about how we are using their personal data then we ask that they contact our Data Protection Officer in the first instance. However an individual can contact the Information Commissioner's Office should they consider this to be necessary, at <https://ico.org.uk/concerns>

## 16. Contact

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

**DPO - Data Controller**

Holy Cross Catholic MAC,

Heathcote Street,

Radford,

CV6 3BL

Email: [DPO@hcmac.co.uk](mailto:DPO@hcmac.co.uk)

Tel: 02475 186 555

**School Data Protection Officer**

Warwickshire Legal Services

Warwickshire County Council

Shire Hall

CV34 4RL

Email: [schooldpo@warwickshire.gov.uk](mailto:schooldpo@warwickshire.gov.uk)



**Table 1** – Personal information we are required to process to comply with the law:

<b>Information Type</b>	<b>Relevant legislation</b>	<b>Special Category– additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Lawful reason for sharing</b>
Pupil Full Name	The Education (information about Individual Pupils) (England) Regulations 2013 Regulation 3 (2)	n/a	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	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	School to which pupil has transferred	Legal Obligation , Public Task
Home Address	The Education (information about Individual Pupils) (England) Regulations 2013	n/a	School to which pupil has transferred	Legal Obligation, Public Task,

<b>Information Type</b>	<b>Relevant legislation</b>	<b>Special Category– additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Lawful reason for sharing</b>
	Regulation 3 (2)			
First Language	The Education (information about Individual Pupils) (England) Regulations 2013 Regulation 3 (2)	n/a	School to which pupil has transferred	Legal Obligation, Public Task
Medical/Dietary/ Allergies		Necessary for preventative or occupational medicine	Department for Education – school census. Other schools. School to which pupil has transferred	Legal Obligation & Vital Interest.
Date of Admission to school	The Education (information about Individual Pupils) (England) Regulations 2013 Regulation 3 (2)	n/a	Local Authority School to which pupil has transferred	Legal Obligation

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

<b>Information Type</b>	<b>Relevant legislation</b>	<b>Special Category– additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Lawful reason for sharing</b>
Proficiency in English		n/a	Local Authority School to which pupil has transferred	Legal Obligation
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)	n/a	Local Authority School to which pupil has transferred	Legal Obligation

<b>Information Type</b>	<b>Relevant legislation</b>	<b>Special Category– additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Lawful reason for sharing</b>
	Regulations 2013 Regulation 3 (2)			
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

<b>Information Type</b>	<b>Relevant legislation</b>	<b>Special Category– additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Lawful reason for sharing</b>
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
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

<b>Information Type</b>	<b>Relevant legislation</b>	<b>Special Category– additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Lawful reason for sharing</b>
Pupil assessment data (Curricular record)	The Education (Pupil Information) (England) Regulations 2005 Regulation 4	n/a	Selected and approved third parties only.	Public Task

**Table 2** – Personal information we are required to process as it is necessary to protect someone’s vital interests

<b>Information Type</b>	<b>Special Category - additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Lawful reason for sharing</b>
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’

<b>Information Type</b>	<b>Special Category - additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Consent requirement</b>
Pupil Full Name	n/a	School to which pupil has transferred	Consent required
Pupil Gender	n/a	School to which pupil has transferred	Consent required
Pupil Date of Birth	n/a	School to which pupil has transferred	Consent required
Home Address	n/a	School to which pupil has transferred	Consent required
First Language	n/a	School to which pupil has transferred	Consent required
Religion	Data Subject has given explicit consent	Local Authority School to which pupil has transferred Birmingham Diocesan Education Service	Consent required
Ethnicity	Data Subject has given explicit consent	Local Authority School to which pupil has transferred	Consent required
National Identity, Country of Birth, Nationality	n/a	Local Authority School to which pupil has transferred	Consent required



<b>Information Type</b>	<b>Special Category - additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Consent requirement</b>
Parent contact details	n/a	School to which pupil has transferred	Consent required
Pupil Images (including video recordings)	n/a	Selected and approved third parties only.	Consent required
Parent name, date of birth, National Insurance Number, 30 hours eligibility code (Nursery)	n/a	School to which pupil has transferred	Consent required

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

<b>Information Type</b>	<b>Special Category - additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Lawful reason for sharing</b>
Pupil information i.e. name, Parent detail, Emergency Contact details	n/a	School to which pupil has transferred	Legal Obligation
Academic Progress data	n/a	Local Authority CAPITA ONE ARBOR MIS The PiXL Club Ltd	Public Task and Legal Obligation

<b>Information Type</b>	<b>Special Category - additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Lawful reason for sharing</b>
Safeguarding information, Medical, Special Education needs	Necessary for preventative or occupational medicine	Selected and approved third parties only.	Public Task & Legal Obligation
Educational and Safeguarding Information used internally for the purpose of educating and protecting the welfare of children.	n/a	Selected and approved third parties only.	Public Task & Legal Obligation
Dietary restrictions	Necessary for preventative or occupational medicine	Catering Contractor	Vital Interest
Medical information including allergies	Necessary for preventative or occupational medicine	Catering Contractor NHS Emergency Services	Vital Interest