



ST. BEDE'S CATHOLIC PRIMARY SCHOOL



Popley Way, Basingstoke

Hampshire, RG24 9DX

Headteacher:
Mr J Carroll

www.stbedesprimary.co.uk

Tel: 01256
533079

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Pupil Privacy Notice (UK GDPR)

1. Introduction

This privacy notice explains how St Bede's Catholic Primary School ("the school") collects, uses, stores and shares personal data about pupils. This notice is written for pupils and their parents or carers. We aim to be clear and transparent about how we use personal data.

We process personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Who is responsible for pupil data?

St Bede's Catholic Primary School is the data controller for pupil personal data. This means we decide how and why personal data is used. We work with Hampshire County Council and other organisations where the law requires or permits us to share information.

Data Protection Officer (DPO)

The school has appointed a Data Protection Officer (DPO): Mrs Colleen Mitchell

Email: c.mitchell@st-bedes.hants.sch.uk

The DPO oversees how we use personal data and can be contacted with any queries.

3. What personal data do we collect?

We collect and use the following types of pupil information:

- Personal identifiers (name, date of birth, address, pupil ID)
- Contact details (parent/carers contact information)
- Characteristics (such as ethnicity, language, and eligibility for free school meals)
- Educational data (attendance, assessment, progress, behaviour)
- Special educational needs (SEN) information
- Safeguarding and child protection information
- Medical and health information
- Catering and dietary information
- Trip and activity information
- Photographs and video recordings (where appropriate)





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- Online learning and communication records
- Identity management and authentication data (usernames, IDs)

We only collect data that is necessary for specific, lawful purposes.

4. How do we collect pupil data?

We collect pupil information in a variety of ways, including:

- Registration and admission forms completed by parents/carers
- Common Transfer Files (CTF) from previous schools
- Local authority data transfers
- Directly from pupils and parents during school life
- From teachers and school staff through assessment and monitoring
- From external professionals (e.g. health or safeguarding services, where appropriate)

Pupil data is essential for the school's operational use. Whilst most of the information you provide is mandatory, some is provided on a voluntary basis. We will inform you at the point of collection whether you are required to provide certain information or if you have a choice.

5. Why do we use pupil data?

We use pupil data to:

Provide education and support learning

- Meet our legal obligations
- Safeguard and promote pupil welfare
- Communicate with parents and carers
- Manage school systems and operations
- Monitor and improve educational outcomes

6. Lawful bases for processing

We process personal data under the following lawful bases:

Article 6 lawful bases

- Article 6(1)(c) – Legal obligation



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- For safeguarding, attendance, and statutory returns
- Article 6(1)(e) – Public task
 - For providing education and running the school

Special category data (Article 9)

We process sensitive data under:

- Article 9(2)(g) – Substantial public interest (e.g. safeguarding)
- Article 9(2)(h) – Health or social care (e.g. medical needs)

These are supported by Schedule 1 of the Data Protection Act 2018.

Consent

We only rely on consent where processing is optional, such as:

- Certain photographs or media use
- Optional digital platforms

Consent can be withdrawn at any time.

7. Data sharing

We may share pupil data where necessary and lawful with:

- Local authorities (e.g. Hampshire County Council)
- The Department for Education (DfE)
- Safeguarding partners
- NHS and health services
- Examination bodies (where applicable)
- Approved service providers (data processors)

We only share the minimum data necessary. We do not share information about pupils with anyone without consent unless the law and our policies allow us to do so. Where we share data without consent, it is because we are legally required to do so or it is necessary to carry out our public task or safeguard pupils.

8. Department for Education (DfE)

The Department for Education (DfE) collects personal data from schools and local authorities via statutory data collections, such as the school census.

We are required to share information about our pupils with the DfE either directly or via our local authority for the purpose of these data collections, under:





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· The Education (Information About Individual Pupils) (England) Regulations 2013

All data is transferred securely and held by the DfE under strict security controls.

For more information about how the DfE collects and uses personal data, please visit:

<https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3>

9. How Government uses Pupil Data

The pupil data that we lawfully share with the Department for Education (DfE):

- underpins school funding, which is calculated based on the number and characteristics of pupils
- informs education policy and school performance monitoring
- supports research to improve educational outcomes

The data is held securely and used for statistical and research purposes.

To find out more about data collection requirements, please visit:

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>

10. The National Pupil Database (NPD)

The National Pupil Database (NPD) is owned and managed by the Department for Education (DfE) and contains information about pupils in schools in England. The NPD is used for research and statistical purposes to improve the education system and the wellbeing of children.

The DfE may share information from the NPD with third parties where it is lawful, secure, and ethical to do so, including:

- schools and local authorities
- researchers
- government departments
- organisations promoting the wellbeing of children

For more information about the NPD, please visit:

<https://www.gov.uk/government/publications/national-pupil-database-mpd-privacy-notice>



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11. Digital systems and suppliers

We use a range of approved systems to support education and school operations.

Some systems are mandatory for core education and safeguarding. Others are optional and will only be used with consent where appropriate. Where optional systems are not used, alternative arrangements will be provided where reasonably possible. All suppliers are subject to data protection contracts and act as processors unless stated otherwise.

Key systems and suppliers

Supplier / System	Purpose	Typical Data Used	Role	Mandatory / Optional	Location / Transfers	Profiling / AI Use
Arbor	School MIS	Core pupil records, attendance, behaviour	Processor	Mandatory	UK / EEA	Administrative analytics only
Tucasi	Payments and trips	Name, class, payment records	Processor	Mandatory for payments	UK / EEA	No profiling or AI use
Teachers2 Parents	Communication	Name, class, contact details	Processor	Mandatory	UK	No profiling or AI use
CPOMS	Safeguarding	Safeguarding and welfare records	Processor	Mandatory	UK	No profiling
Google Classroom	Online learning	Name, school email, work	Processor	Mandatory	International with safeguards	No advertising profiling
ClassDojo	Behaviour and communication	Name, class, behaviour data	Processor	Mandatory	International with safeguards	Behaviour tracking only
Tapestry	EYFS learning journal	Observations, photos, videos	Processor	Mandatory (EYFS)	UK / international with safeguards	No profiling
TT Rockstars	Maths learning	Name, class, usage data	Processor	Mandatory - Curriculum tool	UK / international with safeguards	Progress analytics only
MyMaths	Maths platform	Name, class, progress	Processor	Mandatory - Curriculum tool	UK / international with safeguards	Progress analytics only
SPAG.com	English learning	Name, class, progress	Processor	Mandatory - Curriculum tool	UK	Progress analytics only
Insight / AIR	Assessment tracking	Assessment and progress data	Processor	Mandatory	UK	Educational analytics only



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Supplier / System	Purpose	Typical Data Used	Role	Mandatory / Optional	Location / Transfers	Profiling / AI Use
Cool Milk	Milk provision	Name, DOB, eligibility	Processor	Optional	UK	No profiling
Chartwells	Catering	Name, class, dietary needs	Processor / Controller	Mandatory for meals	UK	No profiling
Librosoft / Harrap ICT	IT support	Username, device data	Processor	Mandatory	UK	System administration only

We regularly review suppliers to ensure they meet data protection standards.

12. Analytics, profiling and automated decision-making

We use limited analytics to support teaching and learning:

- Analytics are only used for educational purposes
- Access is restricted to authorised staff
- Suppliers are not permitted to use pupil data for marketing or independent profiling

We do not carry out automated decision-making that has legal or significant effects on pupils. All decisions affecting pupils involve human review.

13. International transfers

Some of our suppliers may process data outside the UK.

Where this happens, we ensure appropriate safeguards are in place, including:

- UK adequacy regulations, or
- Standard Contractual Clauses (SCCs) with the UK Addendum

14. How long do we keep pupil data?

We only keep personal data for as long as necessary. We store pupil data securely using a combination of electronic systems and paper records, with appropriate access controls in place to protect personal information.





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Typical retention periods include:

- Pupil educational record: transferred to the next school when a pupil leaves
- Safeguarding records: retained in line with statutory guidance (often until age 25)
- Photographs: retained until consent is withdrawn or no longer needed

Further details are available in the school's retention schedule.

15. Pupil rights

Under data protection law, pupils have the right to:

- Be informed about how their data is used
- Access their personal data
- Request correction of inaccurate data
- Request erasure (in certain circumstances)
- Restrict or object to processing
- Data portability (where applicable)

For younger pupils, parents or carers will usually exercise these rights on their behalf. Some rights may not apply in certain circumstances, for example where we are processing data to comply with a legal obligation or to carry out a public task.

16. Safeguarding

We may share information with safeguarding partners where necessary to protect a pupil. This may be done without consent where required by law or to protect vital interests.

17. Complaints

If you have concerns about how we use personal data, please contact us in the first instance. You also have the right to lodge a complaint with the Information Commissioner's Office (ICO):
Website: <https://ico.org.uk>

18. Contact





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For data protection queries, please contact the Data Protection Officer using the details above.

19. Updates to this notice

We may update this privacy notice from time to time. The latest version will always be available on the school website.



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