

## **PRIVACY NOTICE FOR PARENTS / CARERS OF STUDENTS ATTENDING The Convent of Jesus and Mary Language College (CJMLC)**

CJMLC collects data and information about parents / carers of our students so that we can operate effectively as a school. This privacy notice explains how and why we collect parent / carer data, what we do with it and what rights parents have.

CJMLC is an academy within the Diocese of Westminster Academy Trust ("DOWAT"), a multi academy trust with 11 academies. DOWAT is a charitable company limited by guarantee (registration number 07944160) whose registered office is Vaughan House, 46 Francis Street, London, SW1P 1QN. DOWAT is the Data Controller for all the academies within the Trust.

The Data Protection Officer for DOWAT is Dr.K.Sullivan, Foundation Director contact number 01895 679414, postal address the Diocese of Westminster Academy Trust, Edinburgh Drive, Ickenham, Middlesex, UB10 8QY . The Academy Data Protection Lead is Mrs K Bornman, contact number 020 8965 3947 ext 249.

The term "parent" is widely defined in education law to include the natural or adoptive parents (regardless of whether parents are or were married, whether a father is named on a birth certificate or has parental responsibility for the student, with whom the student lives or whether the student has contact with that parent), and also includes non-parents who have parental responsibility for the student, or with whom the student lives. It is therefore possible for a student to have several "parents" for the purposes of education law. This privacy notice also covers other members of students' families who we may process data about from time to time, including, for example, siblings, aunts and uncles and grandparents.

### **Why do we collect and use parent / carer information?**

We collect and use parent / carer information under the following lawful bases:

- a. where we have the consent of the data subject (Article 6 (a));
- b. where it is necessary for compliance with a legal obligation (Article 6 (c));
- c. where processing is necessary to protect the vital interests of the data subject or another person (Article 6(d));
- d. where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Article 6 (e)).

Where the personal data we collect about parents / carers is sensitive personal data, we will only process it where:

- a. we have explicit consent;
- b. processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent; and / or
- c. processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, where we respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Please see our GDPR Policy for a definition of sensitive personal data.

We use the parent / carer data to support our functions of running a school, in particular:

- a. to decide who to admit to the school;
- b. to maintain a waiting list;

- c. to support student learning;
- d. to monitor and report on student progress;
- e. to provide appropriate pastoral care;
- f. to assess the quality of our services;
- g. to comply with the law regarding data sharing;
- h. for the protection and welfare of students and others in the school, including our safeguarding / child protection obligations;
- i. for the safe and orderly running of the school;
- j. to promote the school;
- k. to send you communications that may be of interest to you which may include information about school events or activities, news, campaigns, appeals, other fundraising activities;
- l. in order to respond to investigations from our regulators or to respond to complaints raised by our stakeholders;
- m. in connection with any legal proceedings threatened or commenced against the school.

**The categories of parent / carer information that we collect, hold and share include:**

- a. Personal information (such as name, address, telephone number and email address);
- b. Information relating to your identity, marital status, employment status, religion, ethnicity, language, medical conditions, nationality, country of birth and free school meal / student premium eligibility / entitlement to certain benefits, information about court orders in place affecting parenting arrangements for students);
- c. From time to time and in certain circumstances, we might also process personal data about parents / carers, some of which might be sensitive personal data, information about criminal proceedings / convictions or information about child protection / safeguarding. This information is not routinely collected about parents / carers and is only likely to be processed by the school in specific circumstances relating to particular students, for example, if a child protection issue arises or if a parent / carer is involved in a criminal matter. Where appropriate, such information may be shared with external agencies such as the child protection team at the Local Authority, the Local Authority Designated Officer and / or the Police. Such information will only be processed to the extent that it is lawful to do so and appropriate measures will be taken to keep the data secure.

We collect information about parents / carers before students join the school and update it during students' time on the roll as and when new information is acquired.

**Collecting parent / carer information**

Whilst the majority of information about parents / carers provided 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 parent / carer information to us or if you have a choice in this. Where appropriate, we will ask parents / carers for consent to process personal data where there is no other lawful basis for processing it, for example where we wish to ask your permission to use your information for marketing purposes or to request voluntary contributions. Parents / carers may withdraw consent given in these circumstances at any time.

In addition, the School also uses CCTV cameras around the school site for security purposes and for the protection of staff and students. CCTV footage may be referred to during the course of disciplinary procedures (for staff or students) or to investigate other issues. CCTV footage involving parents / carers will only be processed to the extent that it is lawful to do so. Please see our Trust CCTV policy for more details.

**Storing parent / carer data**

A significant amount of personal data is stored electronically, for example, on our database, SIMS. Some information may also be stored in hard copy format.

Data stored electronically may be saved on a cloud based system which may be hosted in a different country.

Personal data may be transferred to other countries if, for example, we are arranging a school trip to a different country. Appropriate steps will be taken to keep the data secure.

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, insurance or reporting requirements. Details of retention periods for different aspects of your personal information are available in our the Retention of Records Policy for the Diocese of Westminster Academy Trust which is available from the Trust website [www.dowat.co.uk](http://www.dowat.co.uk). To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you. Once you are no longer a parent / carer of a child at the school we will retain and securely destroy your personal information in accordance with Retention of Records Policy for the Diocese of Westminster Academy Trust

### **Who do we share parent / carer information with?**

We routinely share parent / carer information with:

- schools that students attend after leaving us;
- our local authorities within the geographical area of the Trust Hillingdon, Hertfordshire, Brent and Hounslow
- central team at the Diocese of Westminster Academy Trust

From time to time, we may also share parent / carer information other third parties including the following:

- the Department for Education (DfE);
- the Education and Skills Funding Agency
- school local governors / trustees;
- the Police and law enforcement agencies;
- NHS health professionals including the school nurse, educational psychologists,
- Education Welfare Officers;
- Courts, if ordered to do so;
- the National College for Teaching and Learning;
- the Joint Council for Qualifications;
- the Standards Testing Agency
- Prevent teams in accordance with the Prevent Duty on schools;
- The Local Safeguarding Board relevant to the Academies location
- other schools, for example, if we are negotiating a managed move and we have your consent to share information in these circumstances;
- the Catholic Education Service
- Diocesan Officers at the Diocese of Westminster for the purposes of receiving educational support;
- OfSTED
- the school chaplain;
- our HR providers, for example, if we are seeking HR advice and a student is involved in an issue;
- UCAS
- our legal advisors;
- our insurance providers / the Risk Protection Arrangement;

Some of the organisations referred to above are joint data controllers. This means we are all

responsible to you for how we process your data.

In the event that we share personal data about parents / carers with third parties, we will provide the minimum amount of personal data necessary to fulfil the purpose for which we are required to share the data.

### **Data sharing with the Diocese of Westminster**

The Diocesan Education Commission of the Diocese of Westminster is chaired by Bishop John Wilson and is appointed by the Archbishop as a decision-making body which acts in his name. It is responsible to him in all areas relating to education in schools and colleges set out in canon law and English law. It is responsible to the Diocesan Trustees for the financial aspects of providing and maintaining Catholic education in the Diocese of Westminster. The Trust and its academies as Catholic schools within the diocese share information with the Diocese of Westminster to allow them to meet these requirements. Examples of the data provided:

- a) Personal information (such as name, unique student number, date of birth, address, gender, year group, admissions data)
- b) Characteristics (such as ethnicity, religion, language, medical conditions, nationality, Special Education Needs information and free school meal eligibility)
- c) Standards data for the Diocesan Inspection of Catholic Schools
- d) Continued Professional Development (Training data, Inset days)
- e) Information requested by the Bishop
- f) Financial Benchmarking data

### **Requesting access to your personal data**

Under data protection legislation, parents / carers have the right to request access to information about you that we hold ("Subject Access Request"). To make a request for your personal data, please contact the Academy Data Protection Lead, although any written request for personal data will be treated as a Subject Access Request.

The legal timescales for the School to respond to a Subject Access Request is one calendar month. As the School has limited staff resources outside of term time, we encourage parents / carers to submit Subject Access Requests during term time and to avoid sending a request during periods when the School is closed or is about to close for the holidays where possible. This will assist us in responding to your request as promptly as possible. For further information about how we handle Subject Access Requests, please see our GDPR Policy.

### **No fee usually required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

### **What we may need from you**

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). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

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 our data protection responsibilities.

## **RIGHT TO WITHDRAW CONSENT**

In the limited 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 use the "Withdrawal of consent" form available on the CJMLC website to indicate the type of consent that you would like to withdraw and return the completed form to Mrs K Bornman via the 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.

## **DATA PROTECTION OFFICER**

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO Dr.K.Sullivan, Foundation Director contact number 01895 679414, postal address the Diocese of Westminster Academy Trust, Edinburgh Drive, Ickenham, Middlesex, UB10 8QY. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

You can contact the Information Commissioners Office on 0303 123 1113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

## **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.